

<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	22 April 2021
<b>Subject:</b> Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street, London, EC4Y a) Demolition of existing buildings, comprising 69-71 Fleet Street, 72-78 Fleet Street (Chronicle House), 80-81 Fleet Street, 8 Salisbury Court, 1 Salisbury Square, 35 Whitefriars Street (Hack and Hop public house), 36-38 Whitefriars Street, and 2-6 Salisbury Square (Fleetbank House); b) Part demolition of 2-7 Salisbury Court (Grade II) and carrying out of works including remodelling at roof level, formation of new facade to south elevation, part new facade to west elevation and new core and part new floors. Part replacement fenestration, new plant and other works associated with change of use to drinking establishment with expanded food provision (sui generis); c) Erection of three new buildings: 1). A combined court building (Class F1), 2). A police headquarters building (sui generis), and 3). A commercial building including offices, retail and cycle hub (Class E); d) Creation of shared basement for emergency response vehicles, parking, mechanical, electrical and plumbing (MEP), and ancillary functions associated with the three new buildings, with ingress and egress from Whitefriars Street; e) Public realm and highway works, including enlarged Salisbury Square, landscaping, access and servicing arrangements, new pedestrian routes, hostile vehicle mitigation (HVM) measures, and bicycle and vehicle parking; f) Dismantling, relocation and reconstruction of Grade II listed Waithman obelisk within Salisbury Square; g) Other associated and ancillary works and structures.  This application has been submitted alongside two applications for listed building consent (20/00996/LBC and 20/00998/LBC).	<b>Public</b>
<b>Ward:</b> Castle Baynard	<b>For Decision</b>
<b>Registered No:</b> 20/00997/FULEIA	<b>Registered on:</b> 18 December 2020
<b>Conservation Area:</b> Whitefriars Fleet Street	<b>Listed Building:</b> NO

For information: this report also covers considerations for the following related applications for listed building consent:

20-00998-LBC - i) Part demolition of 2-7 Salisbury Court (Grade II listed; ii) remodelling at roof level; iii) formation of new facade to south elevation, and part new facade to west elevation; iv) replacement fenestration; v) new plant; and v) associated internal alterations.

20-00996-LBC - Robert Waithman Obelisk-Salisbury Square- Dismantling, relocating and reconstruction of the Grade II listed obelisk within Salisbury Square.

See the separate reports for recommendations and conditions in respect of these applications.

## **Summary**

The proposed development includes demolition of existing buildings, comprising 69-71 Fleet Street, 72-78 Fleet Street (Chronicle House), 80-81 Fleet Street, 8 Salisbury Court, 1 Salisbury Square, 35 Whitefriars Street (Hack and Hop public house), 36-38 Whitefriars Street, and 2-6 Salisbury Square (Fleetbank House); Part demolition of 2-7 Salisbury Court (Grade II) and carrying out of works including remodelling at roof level, formation of new facade to south elevation, part new facade to west elevation and new core and part new floors. Part replacement fenestration, new plant and other works associated with change of use to drinking establishment with expanded food provision (sui generis);

Construction of three new buildings, the adaptation of one listed building, and the creation of new public spaces (including the repositioning of the Grade II obelisk). The three new buildings would accommodate a new combined Court facility, Police Headquarters for the City of London Police and commercial office floorspace. The Grade II listed building at 2-7 Salisbury Court would be incorporated into the proposed development, to provide a new Public House. With the exception of 2-7 Salisbury Court, all of the existing buildings on the site would be demolished. The Grade II listed obelisk commemorating the MP and libertarian, Robert Waithman, would be carefully dismantled and relocated within Salisbury Square.

The gross floor area would be 52,942 sq.m gea comprising:

18,843sq.m Court building (sui generis)

20,641sqm Police Station (sui generis)

11,783 sqm office building (Class E)

256sq.m retail use (Class E)  
1,138sq.m public house (sui generis)  
281sqm cycle hub (Class E)  
1,786 sqm public realm

An Environmental Statement accompanies the scheme.

The scheme would deliver a Civic Quarter in the heart of the legal community close to the Central Criminal Court (the Old Bailey), the Royal Courts of Justice, the Middle and Inner Inns of Court, and the Business and Property Courts in the Rolls Building which would reinforce the City's reputation as a global centre for business and finance, with the infrastructure necessary to administer justice efficiently and uphold the rule of law.

The proposed Court and police station would support the vision to modernise and upgrade the justice system such that it works for everyone, from judges and legal professionals, to witnesses, litigants and the vulnerable victims of crime, doing so through the use of new technology, infrastructure, services, processes and ways-of-working. The current Covid-19 emergency has accelerated certain elements of the reform programme, for example through the significantly increased use of video hearings and created backlog which the proposed Court would alleviate.

The new police building would provide headquarters for the lead force for economic and cybercrime, the combined court and City of London police operational efficiencies and improvements are expected to flow from co-location. Strategic Policy S22 Fleet Street and Ludgate seeks to promote new court facilities and a City of London Police Station recognising the area is an established legal cluster, focused on the Temples in the City and the Royal Courts of Justice within the City of Westminster. The area is identified in the London Plan as a CAZ Legal Cluster.

The scheme delivers a high quality, commercial building within the City Cluster, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses. Strategic Policy CS1 of the City of London Local Plan 2015, emerging Policy S4 and policy 4.2 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers.

The buildings would be designed to high sustainability standards, incorporating climate resilience, targeting BREEAM "Excellent" rating as the highest feasible and viable rating based on the use and complexity of demands especially for the Police and Court buildings, commercial building, listed building and adopting Circular Economy principles.

Dedicated areas of planting and greening would be incorporated into the development through a combination urban greening of the public realm and on all the buildings terraces; green roofs and walls; and tree planting significantly increasing the biodiversity on site that would contribute to improvements of the wider area.

The scheme delivers significant public realm enhancements, including an extended new amenity space in Salisbury Square; generously proportioned accessible new east-west public routes through the site, connecting Whitefriars with Salisbury Court with approximately 100% increase of dedicated public realm across the development. Salisbury Square would increase in size by 42%.

The proposal would deliver a new Court, Police Building and commercial buildings in identified legal quarter in accordance Draft City Plan 2036 Strategic Policy S22 Fleet Street and Ludgate seeks to promote new court facilities and a City of London Police Station recognising the area is an established legal cluster, focused on the Temples in the City and the Royal Courts of Justice within the City of Westminster. The area is identified in the London Plan as a CAZ Legal Cluster. Policy SD4 of the London Plan seeks to protect and enhance the strategic functions of the CAZ, including the legal functions of the quarter.

The proposals conflict with policies which seek to prevent the loss of retail floorspace in the Principal Shopping Centre, the loss of the existing public house, the loss of medical uses and resulting loss in office floorspace.

Objections have been received from Historic England, Twentieth Century Society, Victorian Society, SAVE, 8 Salisbury Square. Concerns have been raised St Brides; the Inner Temple and a resident at Wine Office Court.

A letter of support has been received from the Fleet Street Bid.

Objections have been received from statutory consultees and third parties, relating to the design of the development; its impact on designated and non-designated heritage assets; the impact on the environment and amenity of the immediately surrounding area and buildings; the impact on the highway network; and the impact on the future development of neighbouring site, specifically 8 Salisbury Square. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and the Unilateral Undertaking.

The scheme benefits from high levels of public transport accessibility, would be car-free (other than disabled parking spaces and parking for operational vehicles) and would promote cycling and walking as healthy modes of travel. The provision of a cycle hub is welcome as an innovative way to meet short stay cycle parking requirements while maintaining a high-quality public realm.

There are a small number of major and moderate adverse impacts, on flats at 142 Fleet Street and 143-144 Fleet Street. Where there are moderate or major adverse impacts, retained levels of VSC are appropriate to the local context. As such the extent of harm is not considered to be such that it would conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. When considered against the wider benefits of the scheme, including the substantial improvements to Salisbury Square and sunlight to the square, these impacts are considered to be acceptable.

Negative impacts during construction would be controlled as far as possible by the implementation of a robust Construction Environmental Management Plan and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions would minimise any adverse impacts.

It is considered that the proposal would preserve the special architectural and historic interest and heritage significance to all heritage assets as listed in this report.

It is also considered that the proposals would preserve the significance and setting of the Whitefriars Conservation Area and Temples Conservation Area and slightly enhance the setting of Whitefriars Conservation Area.

It is considered that the proposal would result in the total loss of heritage significance of six buildings deemed to be non-designated heritage assets. This would result from the demolition of Chronicle House (72-78 Fleet Street), 80-81 Fleet Street, 8 Salisbury Court, 1 Salisbury Square, numbers 35 and 36-38 Whitefriars Street. The loss of the altered remains of Hood Court, Hanging Sword Alley and through route of Primrose Hill would also result in the total loss of significance of these historic fragments of urban structure considered non-designated heritage assets.

The proposal would result in less than substantial harm to the Fleet Street Conservation Area, at the upper end of the spectrum. This significant level of harm would result from the demolition and total loss of significance of those six buildings which are non-designated heritage assets, and which make modest to high contributions to the character and appearance and heritage significance of the Fleet Street Conservation Area, as a whole. The total loss of the altered and fragmentary remains of Hood Court and Hanging Sword Alley would result in the loss of these non-designated heritage assets, and their more modest contribution to the Fleet Street Conservation Area would be lost. Their respective individual local significance and intrinsic architectural, historic and artistic values, and the contribution these make to those of the Conservation Area, would be lost. Beyond this level of identified harm, it is considered that the siting, disposition/layout, form, bulk, massing and architectural expression of the new build proposals preserve its character, appearance and heritage significance.

The proposed development would erode the positive contribution setting makes to the significance of St Pauls Cathedral Conservation Area due to the harm to the processional route which is central to the designated heritage assets setting and significance. In attaching great weight to the harm and the significance of the designated heritage this is evaluated at the lower end of less than substantial and is considered to be slight.

St Pauls Cathedral is an iconic building of international importance and its historic, architectural and evidential values are of the uppermost significance and therefore great weight must be attached to this significance in evaluating any impacts. The impact in this case is experienced from a single location and on a transient basis as the proposed development momentarily obscures part of the dome and lantern on approach around the Fetter Lane and Fleet Street junction. This impact is considered harmful and the special architectural and historic interest and heritage significance of St Paul's Cathedral would not be preserved. Attaching great weight to the iconic heritage status and values of significance the impact is evaluated as less than substantial. Due to the momentary nature of the harm and the quality of the baseline view of the listed building which is not pristine the level of less than substantial harm is considered to be low.

The proposals would fail to preserve the setting and would result in some minor less than substantial harm, at the lower end of the spectrum, to the special interest and heritage significance of St Bride's Church, as the result of a slight diminishment in its local and wider riparian townscape presence, in particular in important views of civic/historical resonance. There would also be a minor enhancement to its significance as a result of a proposed new vista to the rear of the proposed Courts Building.

The proposals would fail to preserve the setting and would result in some minor less than substantial harm, at the very lower end of the spectrum, to the special interest and heritage significance of the Old Bailey, as a result of a slight diminishment of its tower silhouette in wider important riparian views.

The development would preserve the existing setting of St Paul's as the Strategically Important Landmark. In LVMF 15 B.1, 15 B.2 and 17 B.1 and 17 B.2 the baseline proposals would result in a slight concealment of St Brides and Old Bailey contrary to Policies HC 4 (A). Otherwise the proposal would preserve the setting of St Paul's as the Strategically Important Landmark, other identified landmark elements and the juxtaposition between them would be preserved and there be would no harm to the characteristics or composition of the view in accordance with Policies HC 4, CS 13 and the associated LVMF SPG guidance. The baseline proposals would not be fully compliant with Local Plan Policy CS 13(1), draft City Plan 2036 Policy S13 and London Plan 2021 policy HC4 and guidance contained in the LVMF SPG.

In LVMF 11A.1 and 12A.1 in baseline and cumulative scenarios would result in a slight concealment of St Brides Church contrary to Policies HC 4 (A). Otherwise the proposal would preserve the setting of St Paul's as the Strategically Important Landmark, other identified landmark elements and the

juxtaposition between them would be preserved and there would be no harm to the characteristics or composition of the view in accordance with Policies HC 4, CS 13 and the associated LVMF SPG guidance. The baseline and cumulative proposals would not be fully compliant with Local Plan Policy CS 13(1), draft City Plan 2036 Policy S13 and London Plan 2021 policy HC4 and guidance contained in the LVMF SPG.

It is almost always the case that where major development proposals come forward in the City there is at least some degree of non-compliance with planning policies. In arriving at a decision it is necessary to have regard to all the policies in the development plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it. The heritage policies in the London Plan (in particular HC1) and in the Local Plan (in particular CS12) do not incorporate a balancing exercise as found in paragraph 196 of the NPPF. As a result, if a proposal results in any harm to the significance of a heritage asset it will result in conflict with the heritage policies. The application proposals conflict with London Plan policy HC1 and with Local Plan policies CS12, and DM12.1. Whilst in this case, the proposals are in compliance with a number of policies, conflict has also been identified with a number of other development plan policies as outlined above in this conclusion. It is the view of officers that taken as whole the proposal does not comply with the development plan.

The LPA must determine the application in accordance with the development plan unless other material considerations indicate otherwise. It is for the LPA to weigh the other material considerations and decide whether those that support the development outweigh the priority statute has given to the development plan, and the other material considerations which do not support the proposal. Other material considerations are set out below.

Paragraph 8 of the NPPF sets out that there is a presumption in favour of sustainable development.

As set out in paragraph 193 of the NPPF, great weight should be given to the designated heritage asset's conservation, and at paragraph 194, that any harm should require clear and convincing justification. The weight to be given to a designated heritage assets conservation should increase with its importance.

The NPPF, paragraph 196, requires that harm be balanced against the public benefits. The paragraph 196 NPPF balancing exercise is also to be applied when considering the harm to non-designated heritage assets, designated heritage assets and impacts on the Fleet Conservation Area and processional routes within St Paul's Conservation Area. That balancing exercise is set out in the body of this report. It is the view of officers that giving great weight to the conservation of heritage assets, and considerable importance and weight to the desirability of preserving the setting of listed buildings and to the desirability of preserving or enhancing the character or appearance of the conservation areas, the identified harm to the significance of the designated heritage assets is outweighed by the public interest benefits associated with the proposed development. That is the case whether harm to the significance

of the designated heritage assets affected is considered cumulatively or on an asset by asset basis.

Officers also consider that applying paragraph 197 in respect of harm to the significance of the non-designated heritage assets the harm to their significance is outweighed by the public interest benefits associated with the proposed development. That is the case whether the harm to the significance of the non-designated heritage asset is considered cumulatively or on an asset by asset basis.

This means that notwithstanding the conflict with the heritage policies within the development plan, the NPPF would not support the refusal of this application for planning permission on heritage grounds.

The proposal has been assessed in accordance with other relevant SPGs, SPDs and guidance notes listed in the report.

In addition to the significant benefits that the new Courts and Police station would provide (as identified above) the proposal will deliver a number of other public benefits (including heritage benefits) as set out in the body of this report.

Taking all material matters into consideration, officers are of the view that the material considerations which weigh in favour of the grant of planning permission outweigh the identified conflict with the development plan the and other material considerations which weigh against the grant of planning permission.

As such, applying the approach in NPPF paragraph 11(c) the proposed development represents sustainable development. Further, applying the approach in section 38(6) of the Planning and Compulsory Purchase Act 2004, Officers recommend that planning permission should be granted for the proposed development subject to all the relevant conditions being applied and a commitment being given by the City Corporation as landowner along with Unilateral Undertaking being signed into in order to secure the public benefits and minimise the impact of the proposal.

### **Recommendation**

1. That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:

(a) The application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008);



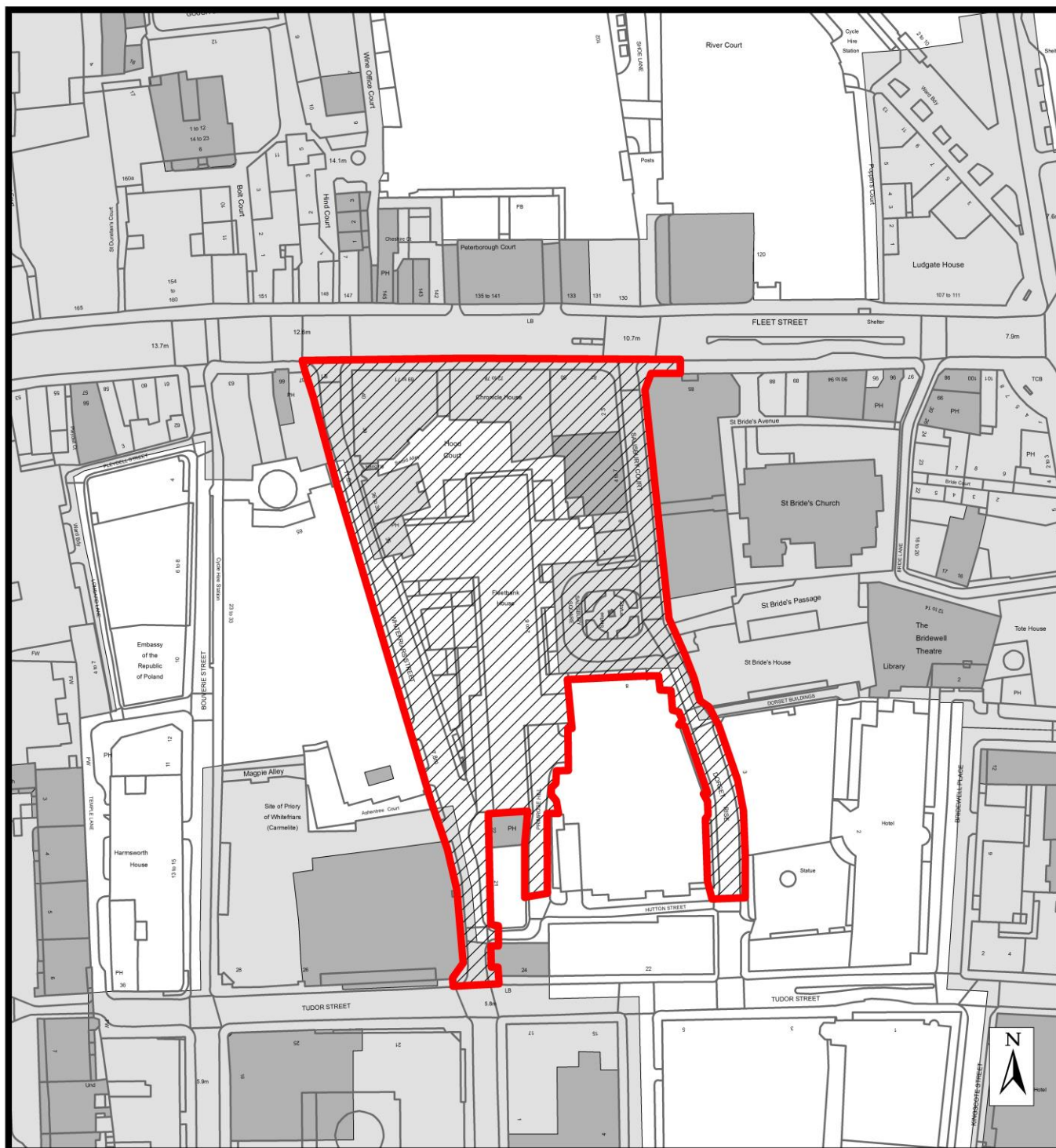
(b) The City as landowner giving a commitment (through a resolution or delegated decision) that it will comply with the planning obligations in connection with the development (and that it will ensure that the obligations are binding on any future purchaser or development partner) and a Unilateral Undertaking being signed in respect of those matters set out in the report, the decision notice not to be issued until the commitment/resolution has been given and a Unilateral Undertaking has been signed.

2. That you agree in principle that the land affected by the proposal which is currently public highway and land over which the public have right of access (comprising areas of Hanging Sword Alley and Hood Court, small areas of Salisbury Square and the land connecting Salisbury Square to Primrose Hill that would be built upon if the development was implemented) may be stopped up to enable the development to proceed and, upon receipt of the formal application, officers be instructed to proceed with arrangements for advertising and making of a Stopping-up Order for the various areas under the delegation arrangements approved by the Court of Common Council.

3. That your Officers be instructed to negotiate the unilateral undertaking.

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

# Site Location Plan



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## ADDRESS:

Land Bounded by Fleet Street, Salisbury Court,  
Salisbury Square, Primrose Street & Whitefriars Street,  
London EC4Y

CASE No.  
20/00997/FULEIA



**SITE LOCATION**



**LISTED BUILDINGS**



**CONSERVATION AREA BOUNDARY**



**CITY OF LONDON BOUNDARY**

DEPARTMENT OF THE BUILT ENVIRONMENT





2-7 Salisbury Court



69-81 Fleet Street





The Harrow Public House



Salisbury Square Surrounded by 8 Salisbury Square and Fleetbank House

## **Main Report**

### **Environmental Statement**

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

representations received in respect of the application.

7. Additional environmental information was received as part of the submission of an amendment to the application. This was published and consulted upon pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The additional information (being further information and any other information) which forms part of the environmental information is also available online along with any further representations received in conjunction with the information.

## **Site and surroundings**

### **The Site**

8. The site lies on the south side of Fleet Street, between Whitefriars Street and Salisbury Court. The site is bounded by Fleet Street to the north, Salisbury Court and Salisbury Square to the east, Primrose Hill to the south and Whitefriars Street to the west.
9. The northern section of the site is located in the Fleet Street Conservation Area and the southwestern corner of the site is located within the Whitefriars Conservation Area.
10. There are two listed structures within the site; the Grade II Listed 2-7 Salisbury Court and the Grade II Listed Waithman Obelisk in the centre of Salisbury Square.
11. Salisbury Square is a public square on the eastern side of the site. To the east of Salisbury Square, on the site boundary, sits the former Reuters Building by Edward Lutyens, 85 Fleet Street (Grade II Listed) with Christopher Wren's St Bride's Church (Grade I Listed) beyond.
12. Fleet Street is designated as a Principal Shopping Centre (PSC) in the Local Plan and a District Centre in the London Plan.
13. Fleet Street is designated as a Local Distributor Road and a Strategic Cycle Route in the Local Plan.

### **Existing Buildings**

14. The site is currently occupied by nine buildings ranging in date from the 1870s to the 1980s.

#### ***2-7 Salisbury Court***

15. 2-7 Salisbury Court is a Grade II Listed Building, constructed in 1878. The building is located on the west side of Salisbury Court, which runs from Fleet Street to the eastern side of Salisbury Square.
16. The building was originally larger and included 80-81 Fleet Street and 1-7 Salisbury Court. In 1921 the Fleet Street frontage and 1-7 Salisbury Court were replaced by the present Barclay's Bank building (80-81 Fleet Street)
17. The building includes retail, medical and office uses.

#### *69-71 Fleet Street*

18. 69-71 Fleet Street, located on the corner of Fleet Street and Whitefriars Street, is a post-modern office building, dating from 1983-86. The building includes retail use at ground floor level and is within the Fleet Street PSC.

#### *Chronicle House, 72-78 Fleet Street*

19. Chronicle House is located at the north side of the site and is flanked by 69-71 Fleet Street and 80-81 Fleet Street and is a 1920s office building. It is a seven-storey building comprising five main storeys and two additional storeys at roof level. The ground floor is occupied by retail uses and the building is within the Fleet Street PSC.

#### *80-81 Fleet Street*

20. 80-81 Fleet Street is in the northeast corner of the site, where Salisbury Court meets Fleet Street, and is flanked by 72-78 Fleet Street and the Grade II Listed 2-7 Salisbury Court.
21. The building is currently occupied by Barclay's Bank and dates from the 1920s. The building has a height of seven storeys fronting Fleet Street, and six storeys with a set-back roof level onto Salisbury Court. To the rear of the building is a two-storey block that is enclosed by a rear lower block connected with the Grade II Listed 2-7 Salisbury Court.

#### *1 Salisbury Square*

22. 1 Salisbury Square is located on the east side of the site and forms the north side of Salisbury Square.
23. The building is a 1961 replacement of an early eighteenth century building that previously stood on the site. This building was damaged in the Second World War and was subsequently replaced by the current building.

#### *Fleetbank House, 2-6 Salisbury Square*

24. Fleetbank House is outside Fleet Street Conservation Area. The east elevation and south elevation of the east wing are on the boundary of Fleet Street Conservation Area.
25. The building was constructed between 1971-1975 and is a large ten storey office building with four adjoining four storey wings and a double basement.
26. Fleetbank House is a large building that dominates the western side of Salisbury Square and includes lower blocks that connect with 1 Salisbury Square and 8 Salisbury Square to the east, the Hack and Hop Public House at 35 Whitefriars Street to the west and the Grade II Listed Harrow Public House to the southwest. The lower block to the north faces an area of hard landscaping and pedestrian route of Hanging Sword Alley.

### *Hack and Hop Public House, 35 Whitefriars Street*

27. The Hack and Hop is located to the northwest of the site. It is on the east side of Whitefriars Street, is within, and forms part of the southern boundary of the Fleet Street Conservation Area. The building dates from the nineteenth century and is five storeys in height.

### *36-38 Whitefriars Street*

28. 36-38 Whitefriars is located to the northwest of the site and is in Fleet Street Conservation Area. It is on the east side of Whitefriars Street and is flanked by 69-71 Fleet Street and the Hack and Hop Public House.
29. The building is an eight storey commercial building dating from the nineteenth century. The main building underwent extensive refurbishment in 1986, and there have been alterations to the elevation.

### *8 Salisbury Court*

30. 8 Salisbury Court is a narrow warehouse building, constructed in 1874 which was subsequently converted into an office building in 1920.
31. In July 2020, Certificates of Immunity from Listing were granted for all the unlisted buildings on the site; 69-71 Fleet Street, Chronicle House (72-78 Fleet Street), 80-81 Fleet Street, 1 Salisbury Square, Fleetbank House (2-6 Salisbury Square), Hack and Hop Public House (35 Whitefriars), 36-38 Whitefriars and 8 Salisbury Court.
32. The Certificates of Immunity from Listing remain valid for a period of five years (until July 2025)

### Surrounding Area

33. The site forms part of an established legal cluster focused on the Temples in the City of London and the Royal Courts of Justice in the City of Westminster. The area is identified in the London Plan as a specialised economic cluster within the Central Activities Zone (CAZ) with a strong legal character.
34. The predominant land use around the site is office accommodation with ground floor retail uses along Fleet Street, and a limited amount of residential uses. In the immediate vicinity of the site, to the east on Salisbury Court, is the Church of St Bride's. To the south are various office buildings. Directly to the west of the site, there is an office led mixed use building (65 Fleet Street). On Fleet Street there are various retail uses. To the north of the site is Daniel House/Peterborough Court, which is in use as offices.
35. There are a number of listed buildings in relatively close proximity to the site, including:
- St Bride's Church (Grade I Listed);
  - The Daily Express Building, 120 Fleet Street (Grade II\* Listed);
  - Mersey House, 132-134 Fleet Street (Grade II Listed);



- The Daily Telegraph Building, 135-141 Fleet Street (Grade II Listed);
  - 143-144 Fleet Street (Grade II Listed);
  - Ye Olde Cheshire Cheese Public House, 145 Fleet Street (Grade II Listed);
  - 146 Fleet Street (Grade II Listed);
  - 82-85 Fleet Street/9 Salisbury Court (Grade II Listed);
  - The Tipperary Public House, 66 Fleet Street (Grade II Listed);
  - The Harrow Public House, 22 Whitefriars Street (Grade II Listed);
  - Northcliffe House (Grade II Listed); and
  - 24 Tudor Street (Grade II Listed).
36. Fleet Street forms part of the Processional Route between Westminster and the City of London.

### **Proposals**

37. Planning permission is sought for (application reference 20/00997/FULEIA):
- a) Demolition of existing buildings, comprising 69-71 Fleet Street, 72-78 Fleet Street (Chronicle House), 80-81 Fleet Street, 8 Salisbury Court, 1 Salisbury Square, 35 Whitefriars Street (Hack and Hop public house), 36-38 Whitefriars Street, and 2-6 Salisbury Square (Fleetbank House);
  - b) Part demolition of 2-7 Salisbury Court (Grade II) and carrying out of works including remodelling at roof level, formation of new facade to south elevation, part new facade to west elevation and new core and part new floors. Part replacement fenestration, new plant and other works associated with change of use to drinking establishment with expanded food provision (sui generis);
  - c) Erection of three new buildings:
    - 1. A combined court building (Class F1)
    - 2. A police headquarters building (sui generis); and
    - 3. A commercial building including offices, retail and cycle hub (Class E)
  - d) Creation of shared basement for emergency response vehicles, parking, mechanical, electrical and plumbing (MEP), and ancillary functions associated with the three new buildings, with ingress and egress from Whitefriars Street;
  - e) Public realm and highway works, including enlarged Salisbury Square, landscaping, access and servicing arrangements, new pedestrian routes, hostile vehicle mitigation (HVM) measures, and bicycle and vehicle parking;
  - f) Dismantling, relocation and reconstruction of Grade II listed Waithman obelisk within Salisbury Square;
  - g) Other associated and ancillary works and structures.

38. Listed building consent is sought for the following works to 2-7 Salisbury Court (application reference 20/00998/LBC):
- i) Part demolition of 2-7 Salisbury Court (Grade II Listed);
  - ii) remodelling at roof level;
  - iii) formation of new facade to south elevation, and part new facade to west elevation;
  - iv) replacement fenestration;
  - v) new plant; and
  - vi) associated internal alterations.
39. Listed building consent is sought for the following works to the Waithman Obelisk (Grade II Listed) (application reference 20/00996/LBC):
- i) Dismantling, relocating and reconstruction of the Grade II listed obelisk within Salisbury Square.
  - ii) Listed Building Consent is sought for the relocation of the bust of T.P. O'Connor and accompanying plaque to the east elevation of 2-7 Salisbury Court (Grade II listed).
40. This report deals with the considerations for all three applications.
41. The Salisbury Square Development envisages the construction of three new buildings, the adaptation of one listed building, and the creation of new public spaces (including the repositioning of the Grade II obelisk). The three new buildings would accommodate a new combined Court facility, Police Headquarters for the City of London Police and commercial office floorspace. The Grade II listed building at 2-7 Salisbury Court would be incorporated into the proposed development, to provide a new Public House. With the exception of 2-7 Salisbury Court, all of the existing buildings on the site would be demolished. The Grade II listed obelisk commemorating the MP and libertarian, Robert Waithman, would be carefully dismantled and relocated within Salisbury Square.
42. All buildings proposed to be demolished benefit from a Certificate of Immunity from Listing and would be replaced with three new buildings. The entire site would be re-landscaped.
43. The new Court building is proposed to be located to the north of the site, with its primary elevation to Fleet Street, occupying the full width of the plot. The main public entrance sits centrally and leads into an open foyer that offers a visual connection through to the new public realm to the south.
44. The proposed City of London Police Headquarters would face onto the remodelled Salisbury Square, with the primary entrance facing the western edge of the square.
45. A commercial building is proposed in the south west corner of the site. The entrance to this building defines the south west edge of the enlarged square, revealing itself along Whitefriars Street as the street slopes down towards the river. The building incorporates a public cycle

hub.

46. A new public house is proposed for the listed building at 2-7 Salisbury Court, replacing the Hack and Hop Public House on Whitefriars Street.

#### The Court Building

47. The proposed Court Building would be operated by Her Majesty's Court and Tribunal Services (HMCTS), which is responsible for the administration of all criminal, civil and family courts and tribunals across England and Wales. The Court would be an eight-storey Combined Court building, comprising Crown, Civil and Magistrates' courtrooms (Use Class F1). It would consist of 16,936 sqm (GIA) of floorspace, distributed across all floors.
48. The basement of the Court building and Police Headquarters would be shared. As such, the total floorspace is based on a 50/50 notional allocation of the shared basement.
49. Each floor would provide approximately 1,800 sqm (GIA) with the sixth floor providing 850 sqm (GIA). The new Court Building would include office areas, hearing rooms, waiting rooms and other specialist law use areas.
50. A vital requirement for the Court building is the provision of separate access and circulation routes through the building and into the court rooms for the judiciary, jurors and the public in order to comply with HMCTS security standards.
51. The design is also specified to accommodate Court and Tribunal standards for 2025 and beyond and will support the HMCTS reform programme's aims of making justice more accessible by ensuring the technology is available for video hearings, as well as video link capabilities to allow more press and public access to larger trials, enabling open justice. As well as this, the building and the ICT requirements will be designed to facilitate the growing number of economic crime cases that are expected to be heard at the City of London Law Court.

#### City of London Police Headquarters

52. The proposed Police Headquarters would allow the City of London Police (CoLP) to operate within a sustainable and secure environment that can meet the demands placed upon the Police from 2025 onwards, as the Force seeks to protect society against a range of new and emerging threats.
53. The Police Headquarters would provide 18,650 sqm (GIA) of floorspace, distributed across two basement levels, a lower ground level, and ten storeys above ground. The basement of the Court building and Police Headquarters would be shared. As such, the total floorspace is based on a 50/50 notional allocation of the shared basement.
54. The proposed Police Headquarters would be the tallest of the three proposed buildings, with the Court Building to the north and the

Commercial Building to the south. The layout of the building is almost square giving the opportunity for a central core and allowing daylight into the accommodation around the perimeter. Each floor would provide approximately 1,250 sqm (GIA) apart from the ninth floor, which would provide approximately 880 sqm (GIA). The proposed Police Building would include office areas and specialist police use areas such as cells and forensic laboratories.

55. The new Police Headquarters would provide state of the art facilities for twenty-first-century policing. The proposed Headquarters would be the technological base of the CoLP, with sophisticated communication links to front-line officers, serious crime investigation units and forensics.

### Commercial Building

56. The proposed Commercial Building would occupy the south part of the site with its main entrance facing Salisbury Square. It would comprise 10,791 sqm (GIA) of office accommodation across seven floors (levels 02 to 08). A retail space measuring 231 sqm (GIA) would be located at ground and lower ground levels facing Whitefriars Street and the new southern passage, and a cycle-hub (244sqm GIA) for public use would be located in the second basement level, accessed from the new southern passage and served by a dedicated lift. Plant servicing the building would be located in the second basement level.
57. The proposed development has been designed to optimise the site's potential, and to contribute to the provision of new, sustainable commercial floorspace that would be suitable for a range of occupiers.
58. The proposals seek to extend the existing basement beneath Fleetbank House to provide an enlarged basement for the commercial building. A new shared double basement is proposed beneath the Court and Police Headquarters, which would include a large number of ancillary functions associated with these buildings, including vehicular police parking.

### 2-7 Salisbury Court

59. It is proposed that this listed building is converted into a public house comprising approximately 943 sqm (GIA) of Sui Generis floorspace. This is a change of use from retail, medical and offices uses (Use Class E) to Public House (Sui Generis).
60. At ground floor, a new bar area overlooking Salisbury Square is proposed. The floor would be level with the terrace outside and would provide a fully accessible entrance from the south. The bar would also be accessible from the east, on Salisbury Court via the restored loading bay doors. A cycle store and bin store would be provided at this level.
61. The lower ground floor would be used as a bar and cellar for the public house, with daylighting from windows in the ground level lightwell, and from windows opening to a lightwell to the west.
62. The first floor would be used as a dining room for the public house, with a private dining room. The second floor room would be reserved for

private functions, with its own bar area. The third floor would house plant and kitchens in connection with the public house and dining rooms, linked to each level by means of a pair of dumb waiters.

63. The roof would be restored to a steep pitch with dormers returned along the south elevation behind the tall chimney stack. The ridges of the roofs would be linked by a flat roof giving access to clean the windows of the Court building behind.
64. In order to retain and convert the listed building, it would be necessary to replace much of the existing structure, which is understood to date from the 1980s. The proposals seek to replace the north and south party walls, whilst retaining the east and west facades.
65. The proposals for the wider site involve the demolition of the surrounding buildings. To the south of 2-7 Salisbury Court, 8 Salisbury Court and 1 Salisbury Square would be fully removed, resulting in the exposure of the south party wall of the listed building.
66. To the north, the adjacent 1920s Barclay's Bank building (80-81 Fleet Street) would be demolished to enable the erection of the new Court building on Fleet Street. The Court building requires a certain footprint to support required courtroom dimensions and circulation routes. As such, it would encroach upon the listed building, occupying its northwest corner, thereby resulting in the demolition of much of Nos. 2-3 Salisbury Court, although the front section of this part of the listed building would be retained.

#### Obelisk to Robert Waithman

67. It is proposed that the Grade II Listed Obelisk to Robert Waithman is relocated within Salisbury Square.
68. The proposed relocation of the Obelisk within the square seeks to position it as a key node or orientation point in this newly pedestrianised public space. It would be moved south east of its current position on the site to allow it to sit on axis with the new southern passage that leads from the square down to Whitefriars Street. The proposed location would also increase its visibility on approach from the Salisbury Court and Fleet Street to the north and from Dorset Rise to the south.

#### Pedestrian Access

69. The proposed development looks to maximise pedestrian connectivity where possible, whilst maintaining the security and operational requirements needed for the Court and Police Buildings.
70. The proposals include two new east-west passages from Whitefriars Street to an improved and enlarged Salisbury Square. Between the Police building and the new Court building the existing lane of Hanging Sword Alley would be enlarged and moved slightly southwards linking Bouverie Street to the west with St Bride's Avenue to the east. A new link would be provided between the Police Headquarters and the

proposed Commercial Building further increasing the permeability of the site. These routes would improve the site's pedestrian permeability by facilitating east-west movements whilst avoiding Fleet Street and Tudor Street and are integrated into the wider public realm development. The routes would be designated as public highway.

#### Vehicular Access

71. There are two vehicular access points to the proposed development, both from Whitefriars Street. There are currently one way restrictions on Whitefriars Street which mean that there is no entry into this street from Fleet Street.
72. The main vehicular access to the proposed development would be via a secure access located between the Commercial Building and the Harrow Public House. Use of this access would be limited to servicing vehicles, custody vehicles, operational police vehicles and HMCTS staff who are blue badge holders with security clearance.
73. Given the nature of the buildings which would be served via this access, a number of internal security measures would be in place to review and control activity within the curtilage of the site. A guard house would also be provided immediately adjacent to the access.
74. It is proposed that the Whitefriars Street carriageway to the south of the site is widened to support rapid response vehicles to travel southbound as a necessary secondary point of access to the wider highway network. As such, car and motorcycle parking adjacent to the proposed Police Headquarters and Commercial Building would be removed. Motorised vehicles would remain prohibited from entering Whitefriars Street from Fleet Street.

#### Highway Works

75. As part of the development, it is proposed that the two-way vehicular movement currently permitted on Dorset Rise/Salisbury Court between Tudor Street and Salisbury Square is restricted to Dorset Rise between Tudor Street and Hutton Street.
76. North of Hutton Street, vehicle movements would be restricted to southbound only, with a contraflow northbound cycle lane provided, facilitated by the relocation of on-street parking to the eastern side of the carriageway and a new traffic island.
77. Within the Southern Passage, the proposed lift and cycle wheel runners on the staircases would allow cyclists to navigate the change in levels from Whitefriars Street to Salisbury Square and the various cycle access points at Salisbury Square level.

#### Consultations

78. The applicants have submitted a Statement of Community Involvement

outlining their engagement with stakeholders including consultation with statutory and non-statutory bodies including the GLA, Historic England and TfL as part of their pre-application process; interested parties, including St Bride's, 8 Salisbury Square, the Harrow Public House, the Fleet Street Partnership, CAMRA, the Surveyor to the Fabric of St Paul's Cathedral, and the Temples were invited to public exhibitions carried out virtually due to the Covid-19 pandemic; and engagement with neighbours and local businesses.

79. Following receipt of the applications they have been advertised on site and in the press and have been consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Copies of all received letter and e-mails making representations are attached in full and appended to this report. A summary of the representations received, and the Officer's response is set out in the table below.
80. The views of other City of London departments have been taken into account in considering the amended scheme and detailed matters will be covered under conditions.
81. The applicant has provided detailed responses to matters raised in consultee and third-party responses. The applicant's responses are attached in full and appended to this report.

Consultation responses	
Historic England	<p>Historic England objects to the application on heritage grounds.</p> <p>Summary:</p> <p>"The loss of six unlisted buildings of merit, and the marked increase in scale of the new development would result in a high level of harm to the significance of Fleet Street Conservation Area. It is for your Council to determine whether there is clear and convincing justification for the harm caused and whether it would be outweighed by public benefits, but given the level of harm involved to one of the most characterful parts of historic London, these should be treated as high tests. The legal presumption for conservation areas is in favour of preservation or enhancement.</p> <p>We have serious concerns that the current scheme falls short in minimising the conflict between the conservation of the designated heritage asset and the proposed development as required by the NPPF. In particular, we see no justification for the demolition of No. 8 Salisbury Court and No. 1 Salisbury Square (both acknowledged as unlisted historic buildings which contribute to the significance of the conservation area). We are not convinced that this element of harm is needed to achieve the public benefits that we acknowledge might be delivered by other aspects of the proposals. We are disappointed that our pre-application advice on this element has not been progressed and</p>

	<p>formally object to the application on the basis of what we considered to be unjustified harm to heritage significance.”</p> <p>Historic England’s representation also raises the following concerns:</p> <ul style="list-style-type: none"> <li>• The six unlisted buildings – 72-78 Fleet Street (Chronicle House), 80-81 Fleet Street (Barclays Bank), 8 Salisbury Court, 1 Salisbury Square, 36-38 Whitefriars Street and 35 Whitefriars Street – which are to be demolished, contribute strongly to this part of the conservation area.</li> <li>• “There would also be harm to the significance of the conservation area through the loss of historic street pattern and ‘grain’, and the imposition of buildings of a much larger scale. The enlargement of Salisbury Square, which has retained roughly the same dimensions since at least the late medieval period, would be particularly harmful.”</li> <li>• “Imposing a more formal west to east route through the site towards the St. Bride’s Church, as the development proposals seek, is alien to the informal network of alleys and open spaces that characterise this part of the City.”</li> <li>• “Major impacts such as this can progressively and fundamentally erode the character of a conservation area, and it is important to recognise therefore that moderate harm in the context of a large and highly significant conservation area is a very serious issue. Robust justification for any such harm must be required under national planning policy.”</li> </ul> <p>Historic England position:</p> <p>Historic England considers that the proposed development would cause a high level of harm to this characterful part of the Fleet Street Conservation Area, principally due to the demolition of buildings that contribute positively to the character of the area and their replacement with new development of a much larger scale. In addition to the change of scale, the proposals will result in a marked change to the character of Fleet Street by removing a variety of open and active frontages with a single frontage that is solid and impenetrable.</p> <p>The harm to the significance of the conservation area overall would be moderate given the size of the development site relative to that of the conservation area. We consider this to be a very serious issue given the degree of the harm to such an important conservation area in the national context.</p> <p>This harm would be less than substantial in the terms of the Framework, but it would be contrary to the intent of the Framework’s policies for the conservation of the significance of designated heritage assets, something to which great weight should be accorded (NPPF paragraphs 192, 193).</p> <p>Such harm requires clear and convincing justification, and should be</p>
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	<p>accepted only if you conclude that there is such justification and that the harm would be outweighed by the public benefits the proposals would secure (NPPF paragraphs 193, 194, 196).</p> <p>We understand that the proposed development would provide an important public facility, and note the arguments advanced to explain the choice of this site. However, should the City of London, as decision maker, accept this broad justification for the proposals, Historic England considers that the suggested justification put forward for the demolition of No. 8 Salisbury Court and No. 1 Salisbury Square is without merit. A strong element of significance of this part of the conservation area is the eclectic mix of historic buildings and their juxtaposition upon remnants of an historic street pattern that is generally characterised by a lack of formal planning. The demolition of these buildings is not needed to provide any of the facilities which the proposals seek to provide. They could be retained, and their retention would considerably lessen the harm to the character of the conservation area flowing from this scheme.</p> <p><b>Response to comments:</b></p> <p>It is acknowledged that the scheme would have an impact on non-designated heritage assets and that this would cause harm to the Fleet Street Conservation Area. 72-78 Fleet Street, 80-81 Fleet Street, 8 Salisbury Court, 1 Salisbury Square, 35 Whitefriars Street and 36-38 Whitefriars Street make a positive contribution to the character and appearance of the conservation area and typify its urban grain and scale, commercial character and retail uses. This is covered in more detail in the section entitled Impact on Heritage, Principle of Development: including effect on non-designated heritage assets, Fleet Street Conservation Area.</p> <p>The proposed development would provide a new building on Fleet Street of civic scale that responds to the Fleet Street as a principal City route and part of the Processional Route. Its scale and use of materials would be consistent with that of Peterborough Court and 85 Fleet Street. The proposed Court and Police Station uses would offer a substantial public benefit and would revitalise the area reinforcing it as a legal quarter. This is covered in more detail in the section entitled Justification for proposals.</p> <p>The proposed enlarging of Salisbury Square and provision of a new north and south passages would maximise pedestrian permeability throughout the site. The new routes would improve pedestrian permeability across the site, would be alternative routes to Fleet Street and Tudor Street and are integrated with the proposed enhancement of Salisbury Square. This is covered in more detail in the section entitled Proposed landscaping and Public Realm.</p> <p>Salisbury Square would be traffic free, except for occasional use and</p>
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	<p>there would be an increase in planting and seating. There would be an increase in the area of public realm, as it would be enlarged on the north side. It would be re-landscaped with new planters, trees, planting and seats. This is covered in more detail in the section entitled Proposed Landscaping and Public Realm.</p> <p>It is proposed to build a new south elevation to 2-7 Salisbury Court on the north side of the square. It is proposed that the building is a new public house with a new entrance to Salisbury Square. This would attract people to and animate the Square. The design and materials of the new elevation would be traditional and replicate the existing elevation to Salisbury Court. This would enhance the setting of the listed building, Salisbury Square and this part of the Fleet Street Conservation Area. This is covered in more detail in the section entitled Direct Impact on Designated Heritage Assets.</p> <p>The proposed relocation of the Obelisk to Robert Waithman would maintain its role as a focus within Salisbury Square and it would be set within an area of planting and seating. It would be on axis with the new south passage to Whitefriars Street and its visibility would be increased in views from Salisbury Court, Fleet Street and Dorset Rise. This is covered in more detail in the section entitled Proposed Landscaping and Public Realm.</p> <p>It is acknowledged that the proposed demolition of six non-designated buildings would cause harm to the character and appearance of the conservation area. The scheme would have a number of public benefits for the public realm and pedestrian permeability, within and around the site, alterations to 2-7 Salisbury Court and the Obelisk to Robert Waithman. The proposed Court and Police buildings would provide modern Court facilities and Police operation, with shared facilities in keeping with the legal character of the area. The proposed public benefits would be substantial and are considered to outweigh the harm caused. This is covered in more detail in the sections entitled Principle of Development: including effect on non-designated Heritage Assets, Proposed Landscaping and Public Realm, Economic Issues and Strategic Need for Development and Public Benefits.</p>
Twentieth Century Society	<p>"The Society believes that Barclays Bank and Chronicle House are strong contributors to a group of high quality yet typically varied inter-war buildings on Fleet Street. We consider both buildings to have great townscape merit, and their shared classicising decorative detailing is typical of the period. The high quality of facade materials, intricate decoration and survival of original features such as windows give the buildings a strong aesthetic value. Historic interest is provided by the building's construction during the later boom years of the newspaper industry. We consider the buildings to have considerable group value in connection with other inter-war newspaper buildings within the Fleet Street Conservation Area. Both were designed by notable architects,</p>

	<p>some of whose buildings of a similar date have already been listed, and the association with Herbert Owen Ellis is a particular strength for Chronicle House.</p> <p>The Society strongly objects to the demolition of nos. 72-78 Fleet Street (Chronicle House) and 80-81 Fleet Street (Barclays Bank) which are elegant and well-detailed early 20th-century buildings designed by prestigious architects. The demolition of these Non-Designated Heritage Assets would, we believe, cause substantial harm to the Fleet Street Conservation Area.”</p> <p><b>Response to comments:</b></p> <p>Chronicle House, 72-78 Fleet Street and 80-81 Fleet Street are non-designated heritage assets and make a positive contribution to the character and appearance of the conservation area and typify its urban grain and scale, commercial character and retail uses. It is acknowledged that the scheme would have an impact on Chronicle House, 72-78 Fleet Street and 80-81 Fleet Street and that this would cause harm to the Fleet Street Conservation Area, however this is considered to be outweighed by public benefits. This is covered in more detail in the sections entitled Principle of Demolition: including effect on non-designated heritage assets and Justification for proposals.</p> <p>The proposed Court building would provide a new building on Fleet Street of civic scale that responds to the Fleet Street as a principle City route and part of the Processional Route. Its scale and use of materials would be consistent with that of the neighbouring Peterborough Court (Grade II listed) and 85 Fleet Street (Grade II listed).</p>
Victorian Society	<p>The Victorian Society does not have any objection in principle to the redevelopment of the site as the location of new court and police buildings for the City of London. We consider the proposed treatment of 2–7 Salisbury Court itself (essentially façade retention) acceptable. The current proposals, however, will cause a great deal of harm to the significance of the Fleet Street conservation area and some harm to the significance of 2–7 Salisbury Court, through alterations to its setting.</p> <p>We offer the following comments:</p> <p>i) Whilst the demolition of any one of the unlisted buildings on site might be acceptable, the demolition of all of them will cause a great deal of harm to the significance of the conservation area. We note that the 20th Century Society has objected strongly in particular to the demolition of 72–78 and 80–81 Fleet Street. We agree that these buildings make particularly strong and highly visible contributions to the character of the conservation area, and that their loss will cause harm. We add further that 8 Salisbury Court, 1 Salisbury Square, 36–38 Whitefriars Street, and 35 Whitefriars Street all make a positive contribution to the</p>

	<p>significance of the conservation area. Whilst they are unlisted, they nonetheless represent just the kind of robust historic structures that give the area its character and their loss will also cause harm.</p> <p>ii) The proposed new buildings entirely fail to reflect the characteristic scale and grain of the historic built environment. One of the most important aspects of the historic buildings on the site is that, by and large, they characterise the historic scale and grain of the cityscape — indeed, the way in which the buildings on Whitefriars Street (35, 36–38) respect the prevailing scale and grain was explicitly noted as a reason for their inclusion in the 2007 extension to the conservation area. The total loss of these unlisted buildings will cause severe erosion of this characteristic grain; the proposed replacement buildings entirely fail to mitigate the harm to significance that this will cause.</p> <p>This failure is particularly pertinent with respect to the proposed court building. Whilst we have no objection to the principle of larger buildings to the rear (south) of the site, the construction of a single, large building on Fleet Street itself, with a façade stretching the whole length of the block between Salisbury Court and Whitefriars Street, will in principle be harmful, as it will obliterate any legible surviving historic plot divisions. The design of the principal (north) façade of this new building is a grand public gesture, designed as an imposing and symmetrical set piece which makes no acknowledgement whatever of the prevailing historic grain. Although the façade is articulated to some degree by its recessed centre and canted projection, this articulation is weak, and does nothing to reduce the impression of overbearing monumental bulk. We understand the measures that have been taken to disguise the absolute mass of the building by stepping back the top storeys. Such measures, however, can only ever be partially successful, and the sheer bulk of the new court building will be noticeable, especially from the south.</p> <p>iii) The proposed demolition of 1 Salisbury Square, 8 Salisbury Court, and 80–81 Fleet Street will harm the significance of 2–7 Salisbury Court by affecting its setting. As I wrote above, the buildings on either side of 2–7 Salisbury Court contribute to its significance by giving it context which informs both its aesthetic and historic legibility. It is important to note that Peebles’ building was never designed to be seen in the round, but as part of a narrow street of buildings of a similar scale. The two buildings to the south of 2–7 Salisbury Court are the last such buildings, and their loss will harm the significance of the listed building by entirely decontextualizing it. It is also important to bear this point in mind in assessing the effect on significance of the proposed new south elevation: whilst the proposed pastiche is faithful to the style of Peebles’ original, it must be acknowledged that even in principle it fundamentally changes the nature of the listed building. No matter how scholarly the pastiche, this proposed new work will not be straightforwardly beneficial, given the thoroughgoing change in context of which it is a part. On the north side of the listed building, 80–81 Fleet Street manages the transition in scale between the buildings along Salisbury Court and those facing Fleet Street itself, and its Salisbury Court elevation</p>
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	<p>indicates that some care was taken to make this transition sensitively. The proposed new court building entirely fails to match this sensitivity; instead, the junction between the two buildings will be extremely abrupt, and the contrast in scale correspondingly jarring. This contrast will only be exacerbated by the restoration of the roofscape of 2–7 Salisbury court to its original height and the entirely sheer facades of the court building, unrelieved by any mouldings between ground floor and cornice. The stark differences in materials and the handling of materials will add to the decontextualization of Peebles' range.</p> <p>iv) With respect to the proposed treatment of 2–7 Salisbury Court itself, we have no objections. The proposed restoration of the roofscape and of many material details is welcome, and the effectual rebuilding behind a retained façade will not cause a great deal of harm to significance given the degree of historic alteration. Whether or not the proposed new south elevation is acceptable is logically contingent on the acceptability of the demolition of 1 Salisbury Square and 8 Salisbury Court. As noted, the demolition of these buildings will be harmful to the significance of both the conservation area and 2–7 Salisbury Court. If it is nonetheless determined that this harm is outweighed by public benefits then the necessary new façade to 2–7 Salisbury Court must be as scholarly in design, and of as high a quality in terms of materials and workmanship, as possible. We think that the currently proposed design is excellent, and we would be happy to support it subject to the appropriate conditions.</p> <p>v) The redevelopment of Salisbury Square is in principle welcome. The creation of a high-quality new public space in association with the proposed new buildings will be a positive move. The current proposals, however, will cause some harm to the significance of the Waithman memorial by comprehensively robbing it of its prominent position within a public space. The memorial was intended as a focal point; the proposals to reposition it as one element amongst many in a decentralised landscape plan is to ignore its historic function as an eyecatcher and a memorial. In effect, these proposals will complete the obelisk's long metamorphosis from prominent memorial to mere element of street furniture.</p> <p><u>Advice</u></p> <p>Because of both its importance to the street-scape on Fleet Street and the way in which it gives context to 2–7 Salisbury Court, we object strongly to the loss of 80–81 Fleet Street. We think that every effort should be made to retain this building as part of any new development. The retention of this building will have direct implications for the form of the new court building. For the reasons given above we anyway consider a monumental approach to be wrong for this part of the city; the design of the new court building will itself be harmful to the significance of the conservation area, and should be reconsidered. We recommend the development of a new design that respects the</p>
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	<p>prevailing scales and grain of the Fleet Street conservation area.</p> <p>More generally, we object to the loss of all the undesignated historic assets on site. Exactly what degree of demolition would be acceptable is to be determined, but the total removal of all buildings bar 2–7 Salisbury Court from the site will cause grave harm to the Fleet Street conservation area. Some combination of retention and sensitive new design would serve to sustain the significance of both the listed building and the conservation area.</p> <p>We welcome in principle improvements to Salisbury Square. We object, however, to the current landscape plan and its treatment of the Waithman memorial. We advocate for the retention of this memorial as the centre-piece and focal point of any new landscape. Waithman was an important figure in the history of the City, and his memorial should be honoured, rather than pushed aside. There is a focus, currently, on the treatment of monuments to people of whose actions we should feel ashamed; the City itself has declared its intentions to remove statues to William Beckford (senior) and John Cass from the Guildhall. Little has been said, however, of monuments to people whose actions we might like to celebrate more; we suggest that Waithman could be one such, and that his memorial be made more prominent in any amended scheme.</p> <p><b>Response to comments:</b></p> <p>The proposed new south facade to 2-7 Salisbury Court would provide a new elevation to Salisbury Square. The design and materials of the new elevation would be traditional and replicate the existing elevation to Salisbury Court giving the building more prominence, enhanced visibility and an enhanced setting. This is dealt with in more detail in the section entitled Direct Impact on Designated Heritage Assets.</p> <p>80-81 Fleet Street is a non-designated heritage asset and makes a contribution to the character and appearance of the Fleet Street Conservation Area and typifies its urban grain and scale and commercial character. It is acknowledged that the scheme would have an impact on 80-81 Fleet Street and that this would cause harm to the Fleet Street Conservation Area, however this is considered to be outweighed by public benefit. This is covered in more detail in the sections entitled Impact on Heritage and Justification for Proposals.</p> <p>The proposed alterations to the Obelisk to Robert Waithman would maintain its role as a focus within Salisbury Square and it would be set within an area of planting and seating. It would be on axis with the new south passage to Whitefriars Street and its visibility would be increased in views from Salisbury Court, Fleet Street and Dorset Rise which would be a public benefit. This is covered in more detail in the section entitled Proposed Landscaping and Public Realm.</p>
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	<p>The scheme would have substantial public benefits, including enhanced public realm and pedestrian permeability within and around the site, alterations to 2-7 Salisbury Court and the Obelisk to Robert Waithman. The proposed Court and Police buildings would provide modern Court facilities and Police operation, with shared facilities in keeping with the legal character of the area. The proposed public benefits are considered to outweigh the harm caused. This is covered in more detail in the section entitled Justification for Proposals.</p>
SAVE	<p>SAVE Britain's Heritage strongly objects to the above planning and listed building consent applications and considers the issues raised by the application to be of strategic and national significance, and therefore pursuant to determination by the Secretary of State for Housing, Communities and Local Government at a public inquiry under Section 77 of the Town and Country Planning Act 1990.</p> <p>The House of Commons Briefing Paper (Number 00930, 11 July 2016) pertaining to calling in planning applications states that: <i>'The power to call-in planning applications is very general and the Secretary of State can call-in an application for any reason... They normally relate to planning applications which raise issues of national significance.'</i> We consider the applications should be called in for the following reasons:</p> <p><u>Strategic nature of the proposals</u></p> <p>Firstly, the City of London Corporation's brief for this site outlines its intention to provide headquarters to both the City of London Police and HM Courts and Tribunal Service (HMCTS) which will serve as assets of strategic national importance. Paragraph 1.1 of the applicant's Design &amp; Access Statement (DAS) states a key ambition of the proposals is to <i>'reinforce the UK's reputation'</i> in the arenas of law and justice. The new courts building, the largest of the three proposed, is described as a <i>"national asset for the HMCTS"</i> that will <i>"reinforce the UK's reputation as a world-leading legal centre"</i> and form the centre of the UK's judiciary. Similarly, paragraph 1.4.2.3 of the DAS states the 'Brief' for the new City of London Policy HQ building is to facilitate the forces' <i>"fulfilment of its national policing obligations"</i> and its <i>"national role in preventing and investigating fraud."</i></p> <p><u>Protection of the historic environment</u></p> <p>Secondly, the proposals raise significant national issues regarding the management and protection of the historic environment, and in particular, the designated Fleet Street Conservation Area (FSCA) and multiple NDHAs within it. In its strong objection to the proposals, Historic England makes it clear the harm posed to the FSCA through the loss of six NDHAs of high significance and the large scale, single block buildings proposed in their place, is unacceptable, and has national implications even when weighed against the scheme's public</p>

	<p>benefits.</p> <p><i>“Major impacts such as this can progressively and fundamentally erode the character of a conservation area, and it is important to recognise therefore that moderate harm in the context of a large and highly significant conservation area is a very serious issue... We consider this to be a very serious issue given the degree of the harm to such an important conservation area in the national context.”</i></p> <p>The City of London Corporation is both the landowner, applicant, and statutory decision maker in this case. Given the clear national strategic role of this proposed development, and the level of demolition proposed to designated and NDHAs, we consider that it is appropriate for the application to be called-in and determined by the Secretary of State.</p> <p><u>Policy appraisal</u></p> <p>In our view, the proposals contravene the following local and national planning policies designed to protect the historic environment:  The City of London’s adopted Local Plan (2015) which outlines the Local Planning Authority’s intention to preserve and enhance <i>“the distinctive character and appearance of the City’s conservation areas”</i> (Core Strategic Policy CS12: Historic Environment)  The Local Plan also states that <i>“Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted”</i> (Policy DM 12.2 Development in conservation areas).</p> <p>Strategic Policy S11 in the City’s emerging Local Plan 2036 (Proposed Submission Draft: March 2021) which states that: <i>“The City’s heritage assets, their significance and settings will be positively managed, by: 1. Conserving and enhancing heritage assets and their settings to ensure that the City’s townscapes and heritage can be enjoyed for their contribution to quality of life and wellbeing.”</i> Policy HE1 ‘Managing Change to Heritage Assets’ also restates Policy DM 12.2 outlined above.</p> <p>The National Planning Policy Framework (NPPF, 2019) states that <i>“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation”</i> (paragraph 193).  Furthermore, Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act) specifies that in making a decision on an application for development in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.</p> <p>National Planning Policy Guidance PPS5 similarly states there is a presumption in favour of conserving heritage assets when assessing planning applications.</p>
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	<p><u>Conclusion</u></p> <p>For the reasons outlined above, we object to the above planning and listed building applications, and we urge the Local Planning Authority to refer this application for determination by the Secretary of State, and we are notifying him of this.</p> <p><b>Response to comments:</b></p> <p>The site forms part of an established legal cluster focused on the Temples in the City of London and the Royal Courts of Justice in the City of Westminster. The area is identified in the London Plan as a specialised economic cluster within the Central Activities Zone (CAZ) with a strong legal character. This is covered in more detail in the sections entitled Proposed Uses and Economic Issues and Strategic Need for Development.</p> <p>Strategic Policy S22 Fleet Street and Ludgate seeks to promote new court facilities and a City of London Police Station recognising the area is an established legal cluster, focused on the Temples in the City and the Royal Courts of Justice within the City of Westminster. This is covered in more detail in the sections entitled Proposed Uses and Economic Uses and Strategic Need for Development.</p> <p>It is acknowledged that the scheme would have an impact on non-designated heritage assets and that this would cause harm to the Fleet Street Conservation Area. 72-78 Fleet Street, 80-81 Fleet Street, 8 Salisbury Court, 1 Salisbury Square, 35 Whitefriars Street and 36-38 Whitefriars Street make a positive contribution to the character and appearance of the conservation area and typify parts of its urban grain and scale, commercial character and retail uses. Partial demolition is also proposed to the listed building 2-7 Salisbury Court. These impacts issues are covered in more detail in the section entitled Impact on Heritage, Principle of Demolition: including effect on Non-Designated Heritage Assets and Fleet Street Conservation Area and Heritage Direct Impacts.</p> <p>The proposed Court building would provide a new building on Fleet Street of civic scale that responds to the Fleet Street as a principal City route and part of the Processional Route. Its scale and use of materials would be consistent with that of the neighbouring Peterborough Court (Grade II listed) and 85 Fleet Street (Grade II listed). This is covered in more detail in the sections entitled Architecture and Urban Design and Proposed Court Building height, massing and design detail.</p>
The Greater London Authority	<p><u>Strategic issues summary</u></p> <p><b>Principle of development:</b> The redevelopment of the site within the Central Activities Zone to provide offices, a police station, judicial courts and retail uses is supported in accordance with London Plan</p>

	<p>Policies S1, SD4 and SD5 and Good Growth Objective GG1.</p> <p><b>Heritage, strategic views and urban design:</b> On heritage, some harm would be caused to the Fleet Street Conservation Area and Grade II listed 2-7 Salisbury Court due to the proposed demolition that may be outweighed by the public benefits; the visualisations presented in the TVIA demonstrate that the proposal is compliant with the LVMF SPG and London Plan Policy HC4; and, the approach to design is broadly supported with the proposed expansion of the public square and creation of new east-west routes strongly supported.</p> <p><b>Transport:</b> Clarification on the safety of cycling routes along Whitefriars Street and Salisbury Square as well as on-street retail servicing and rapid response vehicle mitigation; financial contributions to TfL cycle route and cycleways signage to be secured; and, cycle parking provision and facilities, travel plan, full deliveries and servicing plan and full construction logistics plan to be secured by condition.</p> <p><b>Sustainable development:</b> On the energy strategy, further information is required in relation to Be Lean, overheating, DHN futureproofing, heat pumps and seasonal efficiencies and distribution and a carbon off-set payment secured. Additional information relating to the estimated WLC emissions (Assessment 2) is also sought.</p> <p><u>Recommendation</u></p> <p>That the City of Corporation be advised that whilst the proposal is supported in principle, the application does not currently comply with the London Plan for the reasons set out in paragraph 71. Where the associated concerns within this report are addressed, the application may become acceptable in strategic planning terms.</p> <p><b>Response to comments:</b></p> <p>Changes to the highway network and the impact on existing and proposed cycle routes will be informed by road safety audits through the detailed design process. Improvements to cycle routes will be secured through the highway scheme of works. The provision of signage, where appropriate, will be secured as part of the highway scheme of works.</p> <p>The proposed cycle parking facilities meet London Plan 2021 standards and will be secured by condition, as set out in the cycle parking section of the report.</p> <p>The submission of a travel plan, delivery and servicing plan and demolition and construction logistics plan will all be secured by condition.</p> <p>The comment on sustainability will be addressed in the Addendum report.</p>
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Transport for London	Comments from TfL are included in the Stage 1 response from the GLA.
Network Rail	No objection.
CTSA	Do not wish to comment.
Environment Agency	Refer to Standing Advice from for Flood Zone 2.
Natural England	No objection.
Thames Water	<p><u>Waste Comments</u></p> <p>With the information provided, Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following condition be added to any planning permission.</p> <p>“No development shall be occupied until confirmation has been provided that either:- 1. Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All wastewater network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents.”</p> <p>Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.</p> <p>The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted.</p> <p>“The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read</p>

	<p>our guide ‘working near our assets’ to ensure your workings are in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.”</p> <p><u>Water Comments</u></p> <p>Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission.</p> <p>“No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.</p> <p>Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development”.</p> <p><b>Response to comments:</b></p> <p>A condition is recommended regarding waste water infrastructure and a condition is recommended regarding water networks. Informatives are recommended regarding public sewers and waste water assets</p>
London City Airport	<p>Any construction cranes participating in the project should be advised to contact the CAA AROPS team who will consult with the relevant aerodrome stakeholders.</p> <p><b>Response to comments:</b></p> <p>A condition is recommended regarding cranes and an informative is regarding contact details for the relevant team.</p>
Heathrow	<p>No safeguarding objections to the proposed development. However, we would like to make the following observation:</p> <p>Although it is not anticipated the use of a crane at this site will impact Heathrow’s Obstacle Limitation Surfaces, Instrument Flight Procedures or Radar. We would like to advise the developer that if a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib, if a tower crane.</p>

	<p><b>Response to comments:</b></p> <p>An informative is recommended regarding the lights required on any cranes.</p>
National Air Traffic Services (NATS)	Does not conflict with safeguarding criteria.
London Borough of Southwark	<p>No formal objection is raised to the proposed development but the Council wishes to make the following comments:</p> <p><u>Design:</u> The site sits in close proximity to strategic views 4A.1 and 52.1A, but does not sit within the wider consultation zone for either view. Nonetheless care should be taken to ensure that the setting of these strategic views would not be adversely affected.</p> <p><u>Transport:</u> The site is within close proximity to Blackfriars Bridge which leads directly into Southwark. The cumulative effects upon the surrounding highway network of the proposed development and other committed schemes in the surrounding area should be considered. The following other issues should also be considered:</p> <ul style="list-style-type: none"> <li>- Road safety encompassing an analysis of at least the last 3 years traffic accidents occurring in the vicinity of this development, identifying the associated contributory factors and suggesting ameliorative measures where there is any specific pattern.</li> <li>- The evaluation of the impact on highway/public transport and pedestrian/cyclist conditions should include improvement measures where deficiencies are identified.</li> <li>- Measures to assist the mobility-impaired pedestrians/cyclists and the cycle parking provision should meet the New London Plan standard.</li> </ul> <p>The following should also be secured:</p> <ul style="list-style-type: none"> <li>- Construction management plan;</li> <li>- Delivery and service management plan; and</li> <li>- Car parking management plan detailing the provision of adequate disabled car parking spaces even if no other car parking provision is proposed.</li> </ul> <p><b>Response to comments:</b></p> <p>Strategic View 4A.1 Primrose Hill to St Paul's Cathedral viewing corridor and wider setting is some distance from the site to the north and does not include Fleet Street. There is no Strategic View 52.1 A. This is dealt with in more detail in the section entitled London View Management Framework.</p>

	<p>The impact on the surrounding highway and public transport is considered in the transport sections of this report.</p> <p>Cycle parking will meet the London Plan 2021 standards for both short- and long-term parking, as set out in the sections of cycle parking.</p> <p>The detailed design of the hard landscaping and surrounding public realm is being developed in consultation with an accessibility consultant, and with input from the City's in-house access team.</p> <p>A construction management plan and delivery and servicing management plan will be secured by condition. A car parking management plan is not considered necessary. The applicant has provided justification for the proposed parking, including two blue badge parking bays for employees of the Court building.</p>
City of Westminster	Do not wish to comment.
CAAC	<p>The Committee considered that in principle the scheme had the potential to enhance the Whitefriars and Fleet Street Conservation Area despite the loss of Chronicle House on Fleet Street. However whilst it was appropriate that the new courthouse should be a 'landmark' building there was a concern that its height would set a precedent for taller buildings particularly to the west where the current building line is uniformly lower. There was also a concern that the scale of the new courthouse would harm the setting of St Bride's Church and the impinge on the more distant views of St Paul's. More generally the incorporation of commercial premises risked over development of the site notably the height and bulk of the court and police buildings compromising the otherwise commendable creation of a new public domain.</p> <p><b>Response to comments:</b></p> <p>Massing and bulk and potential for over development is addressed in the section entitled Architecture and Urban Design.</p> <p>The site is located close to the centre of London's legal quarter, within easy reach of the Royal Courts of Justice, the Central Criminal Court (Old Bailey), the Middle and Inner Temples, Inns of Court and the recently established Business and Property Courts in the Rolls Building. It is placed at the heart of a world-renowned legal district, is an ideal location for a state-of-the-art combined court facility and would form part of the foremost specialist centre for financial, business and property litigation</p> <p>The Salisbury Square site, with its frontage, scale and location, allows the design of a new build combined court that fulfils HMCTS ambitions,</p>

	<p>providing a flexible, modern, secure, fit for purpose environment for all users that has the added attraction of design for sustainability. The site provides sufficient space and vertical clearance to allow the replacement of County, Magistrates and Crown Courts with 18 purpose-built court rooms that meet the 'courts of the future' vision. This is covered in more detail in the sections entitled Economic Issues and Strategic Need for Development and Justification for Proposals.</p> <p>The response to the concern on the St Bride's Church and St Paul's Cathedral setting is covered in more detail in the section entitled Indirect Impacts on the Setting of Designated Heritage Assets.</p>
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Letters of representation	
WSP on behalf of 8 Salisbury Square	<p><b><u>First Letter</u></b></p> <p>We have seen information based on a Pre-application Submission prepared by the Scheme architects and wish to highlight some preliminary concerns about the proposed development. We hope that it will be possible to resolve these through the application process and allow the scheme to proceed while protecting the interests of our client and their property.</p> <p>These concerns are as follows:</p> <p><b><u>Timescale</u></b></p> <p>It is difficult to comment on the scheme when the documents are not available, and when the application is made immediately before the holiday period starts. Assuming that we are in week 1 of the consultation period, this will finish on 8 January and will not give people sufficient time to consider the substantial information that is likely to accompany this application. Many people have already started their Christmas holiday and will be difficult to contact until 4 January 2021. In effect, they will only have five days instead of three weeks, to make their comments on their return in the new year.</p> <p>This is unfortunate and the application would have been better submitted early in the new year to prevent this happening. Thought should be given to extending the consultation period in the new year to address this problem.</p> <p><b><u>Building line</u></b></p> <p>It appears that the south west corner of Salisbury Square, which is presently formed by the junction with Primrose Hill, is to be built over, and a new pedestrian access to the square created from Whitefriars Street to</p>

the west. The building line of the proposed building will project significantly forward of the present building line to create a new flank elevation, and it is proposed to insert windows into this flank which will then borrow light and aspect across our client's site.

These windows will prevent our client from being able to make any alterations to their own building footprint in the event of redevelopment, and will prevent them from being able to push their building line forward to its full extent in the future should they wish. Our client feels, with some justification, that they will be penalised by this aspect of the scheme.

#### Daylight and Sunlight

The building line at the rear of the site where the scheme proposes to build over Primrose Hill, will bring building mass into closer proximity to windows in the flank elevation of number 8 Salisbury Square. It appears that this will have a negative impact on our client's property, and it is not presently clear that the design of the scheme allows for the lighting needs of existing occupiers or provides acceptable levels of daylight and sunlight. The scheme does not demonstrate that the ability to operate the large office building at 8 Salisbury Square would not be adversely impacted.

#### Servicing

8 Salisbury Square is currently serviced via its own service entrance and loading bay, located at lower ground level, off Primrose Hill. This area is used for all daily deliveries, bulk deliveries, couriers, refuse collection and fuel deliveries for the standby generator. The proposed scheme appears to build over the northern part of Primrose Hill and so close it off for vehicular access north of The Harrow Public House. It seems that access for service vehicles is intended to be diverted via the gated service entrance and entrance to the underground car park to the new development, accessed from Whitefriars Street, with the service vehicles for 8 Salisbury Square passing beneath the new office building.

As this is to be a secure access for the police station and the courts, and we are not aware of any rights of access over the adjoining site, this has the strong potential to either restrict access relative to the arrangements currently enjoyed, or remove them entirely. Either alternative is a serious concern to our client, will impact every business occupying 8 Salisbury Square and, to be blunt, is unlikely to be acceptable to them.

Local Plan policy requires on site servicing areas to be provided to allow all vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Retention of existing servicing arrangements is also protected, and so this aspect of the scheme will be a concern to your Authority as well.

#### Access

At present 8 Salisbury Square is fully accessible to people with



disabilities. This is because the front entrance is adjacent to the public highway which runs around the square and vehicles can pull up opposite the entrance to allow much more convenient access. The scheme will pedestrianize the square but will not leave any spaces for setting down as Salisbury Court and Dorset Rise, which form the east side of Salisbury Square, are single width carriageways subject to parking restrictions along its full length.

The proposed scheme will therefore make access for people with disabilities more difficult than it is at present, not just for access to our clients' building but also for adjoining buildings in the surrounding area. Planning policies and legislation are designed to prevent such outcomes, but resorting to them should not be necessary as full access should be integral to modern schemes in the first place.

As we mentioned above this is a preliminary list of concerns, but in our view they can be accommodated in the scheme with minimal disruption to the application.

### **Second Letter**

I am writing to give you a short update as to where things stand presently from our client's point of view. We met with the applicant's team on Thursday 4 February 2021 to discuss the scheme. From these discussions it seems to us that some changes to the proposals have been made relative to the information that was available to us before Christmas, and that there will be further changes to come as design anomalies are identified and resolved by the applicants.

In addition, it is likely that our client will have some suggestions to make as to how the scheme might be improved for the benefit of local businesses, institutions, residents and visitors. Once these suggestions are developed in more detail, we hope that it will be possible to incorporate them into the scheme.

These suggestions will primarily address the proposed closure of Primrose Hill and the impact this will have on access to our client's property, both for day to day operations and also longer-term maintenance. Our clients have an additional concern that the development potential of their site will be reduced, particularly in relation to physically getting plant and materials on site. Without wishing to pre-judge the situation, the restricted access across the applicant's land, shared with the Police and Court severely restricts the functionality of our client's site and creates significant difficulties as a workable option.

Given this I am writing to keep you updated as to our active engagement with the project and to confirm that our substantive response to this application is yet to be submitted. We will submit this as soon as discussions with the Applicant have concluded.

	<p><b>Response to comments:</b></p> <p>The application was submitted before Christmas but was not validated, or consulted on until January.</p> <p>Office development is encouraged across the City. There is no policy requirement that renders schemes unacceptable if they impinge on the ability of neighbouring sites to redevelopment in the future, however the impact of permitting development on a planning application site on future development of an adjoining site, is capable of being a material consideration. It is not considered that approving this application would have an adverse impact on future re-development on nearby sites including 8 Salisbury Square. This is covered in more detail in the sections entitled Proposed uses – Commercial Building and Sunlight and Daylight.</p> <p>The applicants are in ongoing dialogue with the owners of 8 Salisbury Square and their representatives.</p> <p>Highway access to the servicing entrance for 8 Salisbury Square would be maintained along Primrose Hill. The revised servicing proposals include the introduction of rising bollards on Primrose Hill, to ensure only vehicles with legitimate reason to access the servicing area of 8 Salisbury Square. The operation of the bollards will be subject to an Access Management Plan, secured by condition. 8 Salisbury Square have agreed to this arrangement in principle, subject to consultation with them on the final Access Management Plan. Officers are satisfied that the proposed servicing arrangements would not unduly impact the operation of the highway.</p> <p>Access for vehicular drop off directly outside the building would be removed as the proposals seek to pedestrianize Salisbury Square. The applicant has identified a proposed location for accessible drop off and pick up to take place on Dorset Rise, close to the entrance of 8 Salisbury Square. The exact location of the entrance will be confirmed through the detailed design of the S278 works, in consultation with neighbouring stakeholders, the City of London Access Group, and the City's in-house access team.</p>
<p>The Revd Canon Dr Alison Joyce, St Brides Church</p>	<p><u>Vehicular access &amp; Parking provision</u></p> <p>At present, Salisbury Court is the only realistic location for hearses, wedding cars, deliveries, contractors and disabled/infirm visitors to gain access to St Bride's. Both uninterrupted vehicular access and controlled parking is essential for the Church to be able to function efficiently and effectively.</p> <p>It is noted that the intention, referenced within both the Transport Assessment, Framework Travel Plan, as well as Chapter 5 of the EIA</p>

	<p>(5.5.7), is to 'increase footway widths on Salisbury Court adjacent to Salisbury square, improving crossing facilities to site to the routes to St Brides'.</p> <p>Equally, it is noted within the Transport Assessment Part 2, Figure 7.3, that the route for all 'Inbound HGV' traffic is proposed down Salisbury Court and through to Dorset rise.</p> <p>St Bride's remains supportive of improvements to permeability and access by foot locally but stresses the importance of continued and unencumbered access to the Church by and for hearses, wedding cars, deliveries, contractors and disabled/ infirm at all times.</p> <p>St Bride's requests that. should the City of London resolve to grant permission for the Proposed Development. continuity of existing vehicular access and parking provision be maintained and ensured by means of Condition to the consent throughout demolition, construction and in perpetuity. This should also be taken into account in the assessment of any subsequent Construction Management or Travel Management. Plans submitted for consideration.</p> <p><u>Impact of additional traffic and pedestrian visitors in the locality</u></p> <p>The assessment of Accessibility, Connectivity and overview of Measures and Incentives to ensure the implementation and effectiveness of Travel Plans for each of the main buildings is appreciated. Nevertheless, St Bride's remains concerned that the City of London consider, and conclude, that the existing road network be adequate to accommodate the likely increase in traffic volume that the Proposed Development will bring (bearing in mind that Fleet Street is already a major bus and transport route).</p> <p>The City of London Corporation conducted a consultation on proposals 'Fleet Street Area Enhancement' in 2015 which sought to pedestrianize and extend public realm from the western end of Fleet Street, and incorporated proposals to narrow existing traffic lanes, to broaden pavements, and to facilitate pedestrian movement. The application documentation related to the Proposed Development as submitted appears to make no reference to these area enhancements.</p> <p>St Bride's requests that the Applicant, and The City of London, please confirm how the application documentation has considered the implications of the 'Fleet Street Area Enhancement', or any similar objectives to increase pedestrianisation should they be progressed, and to outline the measures that will ensure that the impact of the Proposed Development on the traffic and accessibility will be catered for.</p> <p>St Bride's requests that. as recommended within the submitted Transport Framework. both Travel Plans and Construction Management Plans be required as Pre Commencement Conditions - to be submitted and</p>
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assessed in advance of demolition and construction activities to safeguard accessibility through the realisation of the Proposed Development in order that the Church can maintain its work and ministry.

#### Disabled Access

As well as vehicular access for disabled workers and residents, St Bride's submitted during pre-application discussions the need to consider Blue Badge parking bays, already at a premium locally, which should be maintained for the considerable number of disabled workers who use them on a daily basis.

St Bride's welcomes the proposal to include a number of disabled bays for the specific use of operatives of the Proposed Development, namely within the basement and on Salisbury Court, but notes the loss of three disabled bays on Whitefriars Street and Dorset Rise. The speculation over the need of the Doctor's parking bay on Dorset Rise as set out in the Framework Travel Plan is also noted.

St Bride's requests that the existing number of disabled parking bays be retained on Salisbury Court. and is supportive of the repurposing of the Doctor's Bay for additional disabled use.

#### Importance of ongoing liaison

As noted within the Town Planning Statement prepared by Gerald Eve (7.17), organisations including St Bride's Church were consulted during the application process. During the pre-application consultation meetings of August 2020 and November 2020 St Bride's raised, and subsequently submitted, concerns to the Applicant as contained herein. Disappointingly, explanation as to how these concerns have been addressed remains outstanding.

Whilst 'SCI Appendices' form part of the submission documentation, the omission to include the Statement of Community Involvement (SCI), referenced to have been prepared by the London Communications Agency and containing 'full details on the responses received', appears not to be made available online.

St Bride's requests that the SCI be clearly uploaded to the City of London application portal. not least given it is a requirement of the City of London's Validation Checklist. In order to understand how concerns raised have been addressed in the application documentation.

St Bride's welcomes the Applicant's commitment to 'continuing positive and regular dialogue with the local community throughout the application process and into construction' (Town Planning Statement, 7.24), and specifically requests ongoing liaison on key demolition and construction activities should the City of London resolve to grant permission.

### Scheduling of Demolition & Construction works & Noise

During pre-application discussions with the Applicant, St Bride's raised that it be noted that the optimum times for noisy work, both construction and general use, are likely to differ for local businesses, local residents, and the Church. St Bride's requests that its own specific needs, particularly in relation to disruption being minimised during Church Services, be considered and safeguarded.

As acknowledged within the Environmental Statement (ES) Chapter 6, Noise & Vibration, St Bride's is a sensitive Receptor (Reference SR E) to noise and vibration disturbance both throughout construction and upon realisation of the Proposed Development. Given its location 30m east of the site boundary, the sensitivity of St Bride's as Receptor is assessed as 'Medium'.

St Bride's is pleased to note that the assessment of 'Predicted Construction, Demolition and Noise Levels & Effects' (Table 6-8, 6.4.3), concludes that noise levels during demolition, piling, concreting, sub- and superstructure phases are 'Negligible' to St Bride's.

Table 6-14 6.4.12, of ES Chapter 6, summarises the effects on the identified Receptors during Demolition and Construction activities. Here, impact on 'Users' of St Bride's and 'Residents' of neighbouring Receptors are given. It is subsequently reasserted in the Conclusions of the Environmental Impact Assessment (18.1.u), that 'all effects at Receptor E [St Bride's] are considered negligible (insignificant) which means that no supplementary mitigation has been required. As such, all residual effects at Receptor E are also negligible, and therefore insignificant'.

St Bride's requires that it be recognised within all Noise & Vibration assessments that Receptor E is also a place of residence. Any assessment of the impacts of Noise & Vibration to St Bride's as Receptor should be reassessed within the Environmental Statement should its sensitivity to Noise & Vibration be altered given its categorisation for occupation by 'Residents'. in addition to its 'Users'.

St Bride's welcomes the recommendation within the conclusion of ES Chapter 6 regarding 'Future Monitoring of Significant Residential Environmental Effects' and requests that monitoring should be completed at the sensitive receptors for the duration of the works. and that this be secured by Condition.

It is noted within ES Chapter 6 (6.5.9) that the City of London Police (CoLP) will accommodate Emergency Vehicles on the Proposed Development Site, as police station. It is also noted, and appreciated, that the CoLP intend not to 'operate sirens when accessing or leaving the proposed police station unless absolutely necessary and under an emergency situation'. St Bride's is supportive of this. and requests that

	<p>this approach be upheld by Condition. should the City resolve to grant permission.</p> <p><b>Response to comments:</b></p> <p>The SCI is available online.</p> <p>The provision of suitable access and parking provision for St Brides throughout the Demolition and Construction phase will be secured through the demolition and construction management plans.</p> <p>The provision of suitable access and parking provision for St Brides following completion of the development will be secured through the detailed design of highway works following the development.</p> <p>The vehicular trip generation of the proposed uses and the impact on the surrounding highway network is considered in the transport section of the report.</p> <p>A Healthy Streets Plan for the Fleet Street and Temple areas is being developed. Improvements to east-west connectivity through the introduction of the two passages and the enlargement and enhancement of the Salisbury Square public realm are in line with what was proposed in the Fleet Street Area Enhancement referenced, and the 10 Healthy Streets indicators. A highway scheme of works will be secured by condition which will require the applicant to explore and, if feasible, fund footway widening along Fleet Street, the design of which will be developed in consultation with officers working on the Healthy Streets Plan.</p> <p>There are six tests which need to be satisfied for each condition the LPA intends to apply. Conditions must be 1. necessary, 2. relevant to planning, 3. relevant to the development being permitted, 4. enforceable, 5. precise and 6. reasonable in all other aspects. It is considered that restricting the use of sirens by condition would not be necessary or reasonable, because there are guidelines in place for use of sirens, or enforceable as it would not be possible to determine whether the siren should have been used.</p> <p>An informative is recommended advising the applicants to liaise with the Church and other neighbours when compiling the demolition and construction management plans.</p>
Richard Snowden, the Inner Temple	<p>Concerned that the proposed Police Station and Courts complex will be vulnerable because of the narrowness of the local road network and the reliance on too few access/egress points.</p> <p>Police response could be hampered by a lack of multiple routes from the complex.</p>

	<p>It is suggested that a route to Embankment be opened to two-way traffic from the south of Temple Avenue, and a traffic light controlled junction be put in place at the New Bridge Street and Tudor Street intersection, in place of the junctions at Bridewell Place and Water Lane.</p> <p><b>Response to comments:</b></p> <p>The highways and access strategy has been developed in consultation with City of London Police, HMCTS, the City of London as Highway Authority and Transport for London. Access to the site will be available from New Bridge Street via Bridewell Place and from Fleet Street via Bouverie Street and Salisbury Court.</p> <p>The proposed changes to Whitefriars Street would permit rapid response vehicles to leave the site northbound or southbound, providing access to the wider highway using Fleet Street, Tudor Street and Carmelite Street.</p> <p>The applicant will fund a study looking at access to and from the embankment to explore options to reduce through traffic and improve access to the site.</p>
Graham Packham CC	<p>As I am a member of the Planning Committee that will decide this application, I will make no observations about the merits of the proposed development but wish to highlight some concerns which I hope can be satisfactorily addressed with sensible consultation and preparation.</p> <p>These issues relate primarily to the impact of the demolition, construction and operation of the new Court and the new City of London Police headquarters on access for local residents, businesses and other organisations in the vicinity.</p> <p>St. Bride's Church in Fleet Street is particularly vulnerable to disruption as vehicular access to the church is only possible from Salisbury Court. The vulnerability arises because a high proportion of elderly and disabled church goers are unable to use public transport and must rely on using their cars, and parking on Fleet Street is impractical. This means that there is a requirement for continual vehicular access from Salisbury Court, and that parking for disabled visitors and contractors must be maintained there at all times.</p> <p>The proposal to increase footway widths on Salisbury Court is welcome but is likely to have seriously negative unintended consequences. Salisbury Court is very narrow, and the proposed development must preserve the listed building facades at the Fleet Street end on the west side, and this means that the only way that footway widths can be increased is to ban parking on the north part of Salisbury Court which is the main access point to the church.</p> <p>Church services and events are highly sensitive to disruption from noisy building works, the key times for the Church are all day Sunday (for</p>

	<p>services), and late Saturday morning and afternoon (for weddings). However, due to Covid restrictions there is a large backlog of commemorative services outstanding that will need to be held during weekdays once lockdown restrictions are eased. It is vital that the Church is able to stage these as its income has been severely impacted by Covid-19 restrictions in the past year.</p> <p>I propose that the following conditions be imposed if planning permission is granted:</p> <p>Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority.</p> <p>The applicant should consult with the church to ensure disruption is minimised and provide a contact for the church to use if problems do arise.</p> <p>The new buildings must use consolidated deliveries as a planning condition to minimise traffic entering the area during peak times after development is complete.</p> <p>Noisy construction work on Sundays and Saturday afternoons should not be permitted.</p> <p>Parking for church congregation members should continue to be provided in Salisbury Court or an equally convenient alternative be provided both during development and after completion.</p> <p>Finally – traffic entering the Whitefriars area must primarily be for local access, since TfL banned the east bound right turn at Ludgate Circus following the installation of the Cycle Super Highway this has resulted in approximately 50% of the traffic in the area running to non-local destinations. This is unacceptable as would be a further increase.</p> <p><b>Response to comments:</b></p> <p>The provision of suitable access and parking provision for St Brides throughout the Demolition and Construction phase will be secured through the demolition and construction management plans.</p> <p>Footway widening is proposed along the southern section of Salisbury Court where the carriageway is wider. There are no proposals to increase footway width or remove parking on the northern section of Whitefriars Street. The provision of suitable access and parking provision for St Brides following completion of the development will be secured through the detailed design of highway works following the development.</p> <p>The Court, Police and Commercial buildings will be required to use off-site consolidation and for all servicing to take place between 1900 – 0700</p>
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	<p>hours. The public house and retail unit would be serviced on street outside of peak pedestrian hours. The servicing arrangements are outlined in the transport section of the report.</p> <p>The banned right turn for eastbound traffic at the Ludgate Circus junction predates the introduction of the cycle superhighway. The applicant will fund a study looking at access to and from the embankment to explore options to reduce through traffic and improve access to the site.</p> <p>There are six tests which need to be satisfied for each condition the LPA intends to apply. Conditions must be 1. necessary, 2. relevant to planning, 3. relevant to the development being permitted, 4. enforceable, 5. precise and 6. reasonable in all other aspects. It is considered that restricting the use of sirens by condition would not be necessary or reasonable, because there are guidelines in place for use of sirens, or enforceable as it would not be possible to determine whether the siren should have been used.</p> <p>An informative is recommended advising the applicants to liaise with the Church and other neighbours when compiling the demolition and construction management plans.</p>
Resident of Wine Office Court	<p>In principle I would support the application and believe it to constitute an overall improvement to the local environment as well as the fulfilment of key requirements regarding the Courts and the City of London Police. Nevertheless, I would request consideration of the comments below.</p> <p>My main concern revolves around the egress for Police vehicles. I am pleased to see that sections of Whitefriars Street will be made "two-way" to provide an alternative exit south. However, I am concerned that a large proportion of Police vehicle exits would still take place onto Fleet Street, which in busier times can be subject to much congestion. I note the response from the Inner Temple on this point and would support very much their proposal of opening a route onto Embankment to two-way traffic from the south of Temple Avenue.</p> <p>I am also concerned about the potential noise pollution from sirens, especially at night. The plans try to give assurance that this will be minimal. I note this specifically within Paragraph 6.5.9 of the Environmental Statement, where the City of London Police intend not to "operate sirens when accessing or leaving the proposed police station unless absolutely necessary and under an emergency situation". I would request additional assurance in this regard, especially upon exiting into Fleet Street during night-time hours, and strongly support St Bride's in their request that this approach be upheld by Condition, should the City resolve to grant permission.</p> <p>I have a general comment in addition. Although I can see the desirability of retail space behind the Court and Police buildings, I would question the need for additional office space. Presumably, the plans were originally proposed prior to the completion of Brexit, COVID-19, the estimated 10%</p>

	<p>exodus of population from London and the new working culture providing much more acceptance of working from home. All these factors will contribute to a decreased future demand for office space. On Fleet Street alone, there are already many empty offices, including all the space vacated by Goldman Sachs. I am consistently amazed by not only the number of large buildings (many of which are intended to provide office space) still under construction, but also the ones approved for construction but not yet underway.</p> <p>In place of all or some of the proposed office space, I would suggest additional retail space alongside a museum dedicated to Fleet Street itself, covering all of Fleet Street's history while focusing on law and journalism. There is a wonderful display showing history of printing and newspapers laid out on the tiles of Magpie Alley, off Bouverie Street. This has huge potential for expansion within a museum environment. I note that there is a City of London Police Museum. However, I believe that there is no museum in London dedicated to law and the justice system and apart from a Type Archive in Stockwell, nothing relating to journalism, newspapers or printing.</p> <p>The above proposal of a museum ties in very much with the Statement of Community Involvement. Examples of evidence to support this include the responses to questions 1 and 2 of Section 5, where no-one considered the development of Grade A office accommodation to be an important objective of the development, whereas the second highest number of respondents stated that the history and heritage of the site and surrounding area were of most interest to them. In addition, a review of the Consultation Briefing points in several places to the further advantages of having such a museum. It would go much further than the retail or outside spaces in attracting more visitors and it would explain why Fleet Street, as "an ancient part of the City, a link between St Paul's Cathedral and the River Thames and between the City and Midtown", is so important.</p> <p><b>Response to comments:</b></p> <p>The highways and access strategy has been developed in consultation with City of London Police, HMCTS, the City of London as Highway Authority and Transport for London. Access to the site will be available from New Bridge Street via Bridewell Place and from Fleet Street via Bouverie Street and Salisbury Court.</p> <p>The proposed changes to Whitefriars Street would permit rapid response vehicles to leave the site northbound or southbound, providing access to the wider highway using Fleet Street, Tudor Street and Carmelite Street. It would not be appropriate to condition the use of sirens. It would not meet the 6 tests for conditions.</p> <p>There are six tests which need to be satisfied for each condition the LPA intends to apply. Conditions must be 1. necessary, 2. relevant to planning,</p>
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	<p>3. relevant to the development being permitted, 4. enforceable, 5. precise and 6. reasonable in all other aspects. It is considered that restricting the use of sirens by condition would not be necessary or reasonable, because there are guidelines in place for use of sirens, or enforceable as it would not be possible to determine whether the siren should have been used.</p> <p>The suggestion that a Museum should be provided has been shared with the applicant. The applicant has submitted a Cultural Plan as part of the application and a further strategy would be required by condition.</p>
Fleet Street Quarter	<p>On behalf of the Fleet Street Quarter, a business-led Partnership which represents a number of businesses within the Fleet Street area, we would like to express our support for the planning application for the Salisbury Square Development.</p> <p>The proposed new courts complex and Police HQ aid in cementing the City's reputation as an international legal centre, offering a renewed and definitive identity to the Fleet Street area. The development demonstrates a commitment to counteract the insular nature of the proposed law courts through the inclusion of better permeability around the development with enhanced public spaces and greening prospects. The additionally of the commercial space also offers exciting economic opportunities, including ground floor potential.</p> <p>The scheme fits with the common goals of the Fleet Street Quarter; harnessing growth opportunities to reinvigorate and enhance the Fleet Street area into a vibrant district. Beyond this, the scheme demonstrates strong ESG ambitions through exhibiting sustainable practices, a commitment to cultural activation and accessibility. The emphasis on greening, air quality and sustainability for the scheme plays an important role in driving regeneration and investment for the area, which is particularly supported by the Partnership.</p> <p>Concerns around construction management were also addressed, with the developers attending the Fleet Street Quarter December Board meeting, offering reassurance that this had been carefully considered and would be managed in an appropriate way. Carefully considered architectural design also ensures the new development blends coherently alongside the historic landscape across Fleet Street.</p> <p>The various improvements to the public realm, additional greening and economic prospects that the scheme presents are welcomed and celebrated by the Partnership. We hope the City Corporation will approve this application and continue to support the ongoing regeneration and enhancement of Fleet Street.</p>

82. The following amendments were submitted in March 2021, and have been consulted on:

- Omission of the wall and pass gate proposed between the south east corner of the secure access dock and the built out corner of No 8 Salisbury Square which incorporates its internal stairwell
- Omission of proposed static bollard line on Primrose Hill adjacent to the stairwell to the basement of No 8 Salisbury Square
- Introduction of a new bollard line running west to east from the north east corner of The Harrow Public House to the end of the reinstated and realigned north to south bollard line located on the eastern footway of Primrose Hill. The new west to east bollard line would include retractable bollards for access to and from the service yard for No 8 Salisbury Square

83. The following representations have been received:

<b>Consultation responses</b>	
Environment Agency	No further response to make.
National Air Traffic Services (NATS)	Does not conflict with safeguarding criteria.
Thames Water	<p><u>Water Comments</u></p> <p>On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission.</p> <p>“Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.”</p> <p>There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.</p> <p>The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located</p>

	<p>within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.</p> <p><u>Supplementary Comments</u></p> <p>There is no update to the drainage strategy and therefore our comments remain the same as previous.</p> <p><b>Response to comments:</b></p> <p>Informatives are recommended regarding water pressure, water mains, and underground water assets.</p>
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### **Policy Context**

84. The development plan consists of the London Plan and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report
85. The City of London has prepared a draft plan which is a material consideration to be taken into account.
86. The draft City Plan 2036 was approved for consultation by the Court of Common Council in May 2020 and January 2021. The draft City Plan 2036 has been published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. As such, the draft City Plan is a material consideration in the determination of applications alongside the adopted Local Plan, although it carries limited weight until representations on the Regulation 19 consultation have been received and considered (this is addressed in more detail in paragraph 89).
87. Government Guidance is contained in the National Planning Policy Framework (NPPF) 2019 and the Planning Practice Guidance (PPG) which is amended from time to time.
88. There is relevant GLA supplementary planning guidance and other policy in respect of: Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014), Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014), Sustainable Design and Construction (GLA, September 2014), Social Infrastructure GLA May 2015) Culture and Night-Time Economy SPG (GLA, November 2017), London Environment Strategy (GLA, May 2018), London View Management Framework SPG (GLA, March 2012), Cultural Strategy (GLA, 2018); Mayoral CIL 2 Charging

Schedule (April 2019), Central Activities Zone (GLA March 2016), Shaping Neighbourhoods: Character and Context (GLA June 2014); London Planning Statement SPG (May 2014); Town Centres SPG (July 2014); Mayor's Transport Strategy (2018) and the Culture 2016 strategy.

89. Relevant City Corporation Guidance and SPDs comprises Air Quality SPD (CoL, July 2017), Archaeology and Development Guidance SPD (CoL, July 2017), City Lighting Strategy (CoL, October 2018) City Transport Strategy (CoL, May 2019), City Waste Strategy 2013-2020 (CoL, January 2014), Protected Views SPD (CoL, January 2012), City of London's Wind Microclimate Guidelines (CoL, 2019), Planning Obligations SPD (CoL, July 2014). Open Space Strategy (COL 2016), Office Use (CoL 2015), City Public Realm (CoL 2016), Culture Mile Strategy (2018); Cultural Strategy 2018 – 2022 (CoL, and relevant Conservation Area Summaries.
90. In respect of sustainable development, the NPPF states that paragraph 10 that 'at the heart of the Framework is a presumption in favour of sustainable development.' At Paragraph 11(c) the NPPF states that for decision making this means 'approving development proposals that accord with an up-to-date development plan without delay'. Paragraph 11(d) of the NPPF is not engaged since the policies which are most important for determining the application are not out of date; rather they are up to date.
91. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
  - a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
  - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
  - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)
92. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
93. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 103 states that "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health".
94. Paragraph 111 states that "All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement

or transport assessment so that the likely impacts of the proposal can be assessed”.

95. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 124 advises that “The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.
96. Paragraph 127 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and create places that are safe, inclusive and accessible and which promote health and wellbeing.
97. Paragraph 131 sets out that great weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
98. Chapter 14 of the NPPF relates to climate change, flooding and coastal change. Paragraph 151 states that new developments should increase the use and supply of renewable and low carbon energy and heat through measures including renewable and low carbon energy sources and identifying opportunities to draw energy supply from decentralised supply systems.
99. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 190 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.
100. Paragraph 192 of the NPPF advises, “In determining applications, local planning authorities should take account of:
  - a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - c) the desirability of new development making a positive contribution to local character and distinctiveness.”
101. Paragraph 193 of the NPPF advises “When considering the impact of a

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

102. Paragraph 194 of the NPPF states “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
  - a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
  - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”
103. Paragraph 196 of the NPPF states “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.” When carrying out that balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving the building or its setting. When carrying out the balancing exercise in a case where there is harm to the significance of a conservation area, considerable importance and weight should be given to the desirability of preserving or enhancing the character or appearance of the conservation area.
104. Paragraph 197 states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

### **Considerations**

105. The Corporation, in determining the planning application has the following main statutory duties to perform:
  - To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations. (Section 70 Town & Country Planning Act 1990);
  - To determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
106. In considering whether to grant planning permission for development



which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

107. Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that in considering whether to grant listed building consent for any works the local planning authority shall 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.
108. In exercising planning functions with respect to buildings or land in a conservation area, there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. (S72(1) Planning, Listed Buildings and Conservation Areas Act 1990).
109. In considering the planning application before you, account has to be taken of the documents accompanying the application, the environmental information including the Environmental Statement, the further information, any other information and consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.
110. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it.
111. The principal issues in considering this application are:
  - The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.
  - The need for the proposed development.
  - The appropriateness of the proposed uses.
  - The appropriateness of the bulk, massing and design of the proposals.
  - The impact on strategic views in the Local Views Management Framework and on local townscape views.
  - The impacts of the proposal on designated and non-designated heritage assets.
  - The impacts of the proposal on the Fleet Street Conservation Area.
  - The proposed public realm benefits and cultural offer
  - Transport, servicing, cycle parking provision and impact on highways.
  - The impact of the proposed development on the amenity of nearby residential and other occupiers, including noise, overlooking, daylight, sunlight and light pollution.

- The environmental impacts of the proposal including wind microclimate, flood risk, air quality, building resource efficiency, energy consumption and sustainability.

### **Economic Issues and Strategic need for the development**

112. The City is the world's leading international financial and professional services centre and a driver of the national economy, continually innovating and developing new business areas and flexible ways of working. The quantity and quality of new development, particularly office-led development, will meet growing business needs, supporting and strengthening opportunities for the continued collaboration and clustering of businesses that is vital to the City's operation.
113. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.
114. The London Plan 2021 recognises London is the engine of the UK economy, accounting for more than a fifth of the country's economic output. Its labour market, housing market and transport links are interconnected with the wider South East city region, which shapes the development of the whole of the UK. Together, London and the Wider South East contribute a full half of the country's output. London has unique strengths in specialist fields like finance, business services, technology, creative industries and law, as well as attracting tourists from around the world, providing a gateway to the rest of the UK. The wealth this generates is essential to keeping the whole country functioning.
115. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. London Plan Policy SD4 recognises the CAZ as a centre of excellence and specialist clusters including functions of state, health, law, education, creative and cultural activities, and other more local Special Policy Areas should be supported and promoted.
116. The City Plan 2036 Spatial Strategy states the City Corporation will facilitate a vibrant, thriving and inclusive City, supporting a diverse and sustainable London within a globally successful UK. Subsection 2 of the Spatial Strategy promotes the delivery of sustainable growth following the Covid-19 pandemic, including a minimum of 2 million metres squared net additional office floorspace, and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone. Subsection 3 promotes broadening the City's appeal by

ensuring new office developments deliver healthy working environments and meet the needs of different types of businesses, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses.

117. Strategic Policy S22 Fleet Street and Ludgate seeks to promote new court facilities and a City of London Police Station recognising the area is an established legal cluster, focused on the Temples in the City and the Royal Courts of Justice within the City of Westminster. The area is identified in the London Plan as a CAZ Legal Cluster. Policy SD4 of the London Plan seeks to protect and enhance the strategic functions of the CAZ, including the legal functions of the quarter.
118. The applicant states that the City Corporation, City of London Police (CoLP) and HM Courts & Tribunal Service (HMCTS) are each undertaking far-reaching and ambitious transformations in response to dramatic changes to the context in which they operate. These transformations are also far-sighted and visionary, painting future operating models that radically change the way each organisation works. The Salisbury Square Development is an essential component, supporting each transformation individually and jointly.

#### Police Building

119. In addition to its role protecting the people and infrastructure of the City of London, ensuring the Square Mile remains a safe and vibrant place to live, work and visit, CoLP also hold a national role as Lead Force for both economic crime and cybercrime and wider obligations in areas such as counter-terrorism, public order and civil contingencies. CoLP's lead roles for economic and cybercrime are judiciously aligned with its responsibility for policing the City, the economic hub of the country. The Police building is considered to be a key part of a critical public service of immense importance for the City and of London wide significance.
120. The applicant advises that CoLP continually seeks to modernise its policing model in terms of ways-of-working, technology, services, organisation and accommodation. Key to these changes is the move to a modern, adaptable, efficient, sustainable, secure, compliant and fit-for-purpose new headquarters building. Legacy police stations such as Wood Street and Snow Hill were designed for a model of policing appropriate 60 years ago and due to fabric, design and listing status are entirely unsuited to modern policing. Prior to disposal, they had become operationally compromised, inefficient and expensive to run, with significant outstanding backlog maintenance costs. Neither building could be adapted to meet demanding Home Office standards for custody suite design or compliance with structural hardening to meet the threat of bomb blast without significant compromise.
121. As part of the Police Accommodation Strategy review consolidation of its sites was identified as a means of delivering operational and cost efficiencies. As part of the initial review third party assets were considered with over 100 active sites being considered that would deliver equivalent size. The most likely opportunities were all highly

valuable, purpose-built investment assets and it was considered unlikely that they would be available for sale or occupation by City of London Police. Following a review of all City owned sites Wood Street Police Station was identified as the original most viable solution and planning permission and listed building consent were granted in August 2017 (17/00130/FULMAJ and 17/00131/LBC) for its refurbishment and extension. However, detailed work on the refurbishment plans for Wood Street highlighted insoluble problems with the design of security, custody and the contact centre requirements in this listed building.

122. Once the difficulties with the Wood Street site came to light in October 2017, the Salisbury Square site came under closer consideration. The Salisbury Square site was identified as having a number of key advantages in comparison to the other three City-owned alternatives with greater space, fewer physical constraints and the opportunity to meet complex policing requirements through a new build solution. In addition, the Salisbury Square site is the only site where a new scheme would be deliverable that could align with vacation of existing decant space at 21 New Street in 2025.
123. The requirements described by CoLP in its outline brief describes various categories and styles of accommodation with a floor area requirement for each. The total floor area requirement measured by net internal area stands at c. 18,500sqm, a 4,645sqm reduction on the police estate prior to the Accommodation Strategy. The headquarters building must lie within the City boundaries.
124. At a design level, the requirements are tightly constrained by guidance from the Home Office, Her Majesty's Inspectorate of Constabulary, the Centre for the Protection of National Infrastructure and the Security Services much of which is not in the public domain due to its highly confidential and sensitive nature. The example of security, with the complexity of bomb blast considerations, hostile vehicle mitigation, stand-off design and physical security, illustrates how difficult it can become to meet the brief. In addition, specific units in the force also have complex operational requirements; examples here include the power and cooling demands of the technology to support cyber, fraud and economic crime investigation. The Salisbury Square site also enables certain technical requirements to be met that are problematic for alternative sites.
125. The access and security requirements needed by a modern custody suite, defined in detail in Home Office guidance, can be met by a new build on the Salisbury Square site but would not be achievable on any of the other alternatives sites that have been considered. The site provides ample access options, the space to adjust massing, and the ability to integrate critical security requirements at the design stage, without the compromises inherent in an existing asset. A secure basement level is needed both for the transfer of detainees and to meet the needs of the CoLP fleet of vehicles. The site's sloping nature and pre-existing basement levels beneath several buildings on the site, particularly Fleetbank House, provide for this in a cost-effective way.

## Court Building

126. The HMCTS reform programme was launched in 2016 by the Government and senior judiciary to improve the accessibility and efficiency of the justice system. The vision is to modernise and upgrade the justice system such that it works for everyone, from judges and legal professionals, to witnesses, litigants and the vulnerable victims of crime, doing so through the use of new technology, infrastructure, services, processes and ways-of-working. The current Covid-19 emergency has accelerated certain elements of the reform programme, for example through the significantly increased use of video hearings.
127. The design of the court rooms themselves is one of three underpinning components of a transformed user experience. HMCTS put substantial effort into maintaining a Design Guide, the latest version of which was published in February 2019, that sets out the vision, principles and minimum standards for refurbishment and new build court rooms. This guide seeks to establish standards for structure, layout, and finishes whilst allowing new court rooms to operate in a more adaptable, technology enabled manner, supporting the new ways-of-working. An important theme of the transformation is the desire to consolidate court rooms where appropriate, bringing disparate sites together to exploit the flexibility provided by newly developed court rooms, infrastructure and technology.
128. The Courts Acts of 2003 and 1971 place an obligation on the City to provide a Magistrates Court at 1 Queen Victoria Street and Mayor's and City of London Court at Guildhall. Legislative change will allow the transfer of the business of these courts to the new City of London Law Courts as part of the Salisbury Square development. Historically these courts have been provided in buildings that may not have been designed as court rooms, for example the Magistrates Court at Queen Victoria Street was designed and used throughout much of its life, from 1889 to 1988, as the Bank of New Zealand's London office. Due to fabric, design and listing status the existing Mayor's and City of London Court in Guildhall Buildings and Magistrates Court at Queen Victoria Street are unsuited to support the needs of modern justice.
129. The applicants have advised that the magistrates court at 1 Queen Victoria Street and Mayors and City court at Guildhall (both Grade II listed) are not fit for purpose in administering justice in the 21st century. As an example, defendants are required to use a steep staircase at the rear of 1 Queen Victoria Street, which presents a potential and significant safety hazard. Consolidation of the existing courts onto the Fleet Street site shall provide a modern, operationally effective, resilient, compliant and sustainable estate that can respond to future needs of the judiciary & users. The combined court design is aligned to HMCTS' reform programme which aims to drive efficiency by use of new technology and modern methods of working in the way justice is administered.
130. The site is at the centre of London's legal quarter, within easy reach of

the Royal Courts of Justice, the Central Criminal Court (Old Bailey), the Middle and Inner Inns of Court and the recently established Business and Property Courts in the Rolls Building. It is placed at the heart of a world-renowned legal district, is an ideal location for a state-of-the-art combined court facility and would form part of the foremost specialist centre for financial, business and property litigation. The Courts building is considered to be a key part of a critical public service for both the City and wider significance as part of the UK justice system.

131. The Salisbury Square site, with its frontage, scale and location, allows the design of a new build combined court that fulfils HMCTS ambitions, providing a flexible, modern, secure, fit for purpose environment for all users that has the added attraction of design for sustainability. The site provides sufficient space and vertical clearance to allow the replacement of County, Magistrates and Crown Courts with 18 purpose-built court rooms that meet the 'courts of the future' vision.

#### Combined opportunity

132. There are sound and justified reasons to co-locate the two new developments together on the same site, and the Salisbury Square site holds unique advantages for such a development:

133. CoLP and HMCTS share several operational synergies:

- As Lead Force for economic and cybercrime, many of the investigations undertaken by CoLP will result in cases which will be listed in the combined court and operational efficiencies and improvements are expected to flow from co-location. The site might also provide the opportunity for an expansion of economic and cyber-crime prevention and detection, at a later date.
- Both parties require a variety of access routes for different users, and the vehicular access for maintenance can be shared. The site has several natural access routes (Salisbury Square, Primrose Hill and Whitefriars Street), allowing for segregation of distinct user groups.
- The security concerns and requirements for each party are related; a single site allows a common approach to the design of security infrastructure.

134. There are environmental and running cost advantages of a shared site:

- The design incorporates common and innovative elements that will help to reduce running costs and improve maintainability, thereby reducing strain on the public purse. These include: a shared ground source heating solution that will contribute to sustainability targets and reduce overall running costs; a combined, secure service yard at basement level leading to efficiencies in vehicle security controls, refuse management, deliveries and servicing; a shared energy centre in the lowest floor providing efficient mechanical and electrical systems that

will contribute to net carbon neutral targets and save space for machinery and plant.

135. The Salisbury Square site has unique advantages for a joint development:

- The Salisbury Square site provides in excess of 46,500 sqm of development potential. As described previously, there are no other viable sites of equivalent scale that can accommodate both a combined court and police headquarters. The footprint of the site has enabled various massing options to be investigated, ample space for physical security, and the design of innovative, flexible and architecturally relevant solutions.
- The site is owned by the City Corporation giving the right level of financial, design and implementation control required to meet the challenging brief within the constraints of the lease timetable for existing CoLP accommodation.
- The most extensive asset on the site, Fleetbank House, is neither listed nor of townscape merit. It is shortly available through vacant possession and would benefit from redevelopment.

136. The applicants have advised that should the planning application be refused and an appeal be unsuccessful, alternative design options for the site to include the Police Building and Court Building would not work as a response to the specific requirements of their brief. Options studies have concluded that the new Police Building and Court building cannot fit on the site within the constraints of protected views and the limitations on basement design and access given the topography of the site which slopes significantly from north to south. Therefore, under these circumstances the City of London Corporation would be forced to procure an alternative site within the Square Mile. No alternative sites have been found to be available or operationally suitable. Should a new site be identified the process of design, planning, and procurement would have to recommence and this would set the programme back by 5-7 years. A further temporary move of police functions from 21 New Street would be required at significant cost to the Corporation. Moreover, the operational effectiveness of the force would be potentially compromised during this period. It would significantly delay the opportunity to improve court facilities for users and to expand the work of the courts in the Square Mile.

#### Commercial Building

137. A total of 10,791sq.m GIA of high-quality office floorspace (Class E) is proposed across a new seven-storey office building which would occupy the southern part of the site. The existing office floorspace is 31,136 sq.m GIA so there would be a large net reduction in office floorspace across the site, but this loss is considered justifiable in this instance due to reconfiguring the site to make it more permeable and

delivering the Court and Police buildings. The Court Facility and Police Headquarters would in themselves generate employment and would be complementary to the agglomeration of legal businesses and services which have clustered in the western part of the City and in neighbouring Westminster and Camden to be near to the existing Law Courts.

138. An objection has been received from neighbouring commercial occupiers at 8 Salisbury Square relating to the development prejudicing future development of their property affecting daylight and on the grounds of impacts of servicing and disabled access to their premises. Officers do not consider the proposed development would cause a detrimental impact such that it would alter the ability to access and service the building and no evidence has been provided to indicate future development would be unaffected.

### **Proposed uses**

#### **Court Facility / Police Headquarters**

139. The City is currently home to the Central Criminal Court at the Old Bailey, the Rolls Building court complex, the Mayor's and City of London Court, the City of London Magistrate's Court and The Inner and Middle Temples Inns of Court, together with many legal firms. The proposed Court Building would be operated by Her Majesty's Courts and Tribunals Service (HMCTS) and would replace the existing Mayor's and City of London County Court and Magistrates' Court. It would be positioned between the Royal Courts of Justice in Westminster to the west and the Old Bailey to the east therefore adding to an already well-established specialist legal cluster which is identified in the London Plan as a CAZ Legal Cluster.
140. The new eight-storey building across 16,936sq.m (Class F1) would comprise of Crown, Civil and Magistrates' 18-courtroom facility. This proposed new flagship court facility for London would aim to tackle cybercrime, fraud and economic crime. The new building on Fleet Street would replace the existing retail frontage but would seek to provide a unique cultural and artistic activation to the ground floor frontage. The basement of the Court building and Police headquarters would be shared.
141. The proposed City of London Police headquarters would consolidate the existing workforce within one main building, enabling the release of existing City of London Police stations at Wood Street, Bishopsgate and Snow Hill for other uses and allowing their workforce to operate within a sustainable and secure environment. The building would provide 18,650sq.m (Sui Generis) of floorspace, distributed across two basement levels, a lower ground level, and ten storeys above ground. The basement of the Police headquarters and Court building would be shared.
142. In the Draft City Plan 2036, the proposed development would be located within the Fleet Street and Ludgate Key Area of Change (Policy



S22). Policy S22 recognises the character and function of the area as a centre for judicial and related business, while the supporting text notes that the proposed new court facilities and police building would complement the legal cluster and would stimulate further investment in this area.

143. While draft Policy S22 supports in principle the development of new court facilities and a new City of London Police Station, this is subject to the caveat of having regard to the impact of the development on the Fleet Street Conservation Area and heritage assets and the need to ensure security of the buildings for court and police use. Policy S22 also seeks to protect and enhance the character and appearance of the royal and state processional route including views of St. Paul's Cathedral from the route.

#### Provision of Office Accommodation

144. Strategic Policy CS1 of the City of London Local Plan 2015, emerging Policy S4 and policy 4.2 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2036 and policy E1 of the London Plan.
145. The proposed commercial building would provide 10,791 sq.m GIA of office floorspace (this is a reduction of 20,345 sq.m GIA over existing on the overall application site) comprising well designed, flexible office accommodation in a sustainable building, further contributing to the nationally significant economic activity in the City and contributing to its attractiveness as a world leading international financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ and supports the aims of Local Plan policy CS1 and emerging City Plan policy S4.
146. The office floors are arranged around a central core in a layout designed to optimise daylight. The design maximises flexibility and allows for a split tenancy of up to two tenants per floor. As a result of the building's form the floors vary in area, creating a diverse offer to suit the needs of different potential tenants. Manually openable windows are included within the façade, improving the user experience and allowing for natural ventilation when the external conditions are right, an important element of post Covid workplaces. Office floorplates vary between 1000 and 1200 sqm. Plant servicing the building is also located in the second basement level. The proposed office provision addresses the needs of international business in accordance with Local Plan policy DM1.2 and emerging City Plan 2036 strategic policy S4 and

policy OF1.

147. The proposed development seeks to provide roof terrace spaces at levels 6 and level 9 (roof top terrace) for the use of office occupiers at podium and roof levels, these spaces would provide high quality amenity space to City workers and would contribute to the urban greening of the building. Such external terraces are increasingly important as break out areas with fresh air, especially in post Covid workplaces. The proposed office provision addresses the needs of international business in accordance with Local Plan policy DM 1.2 and emerging City Plan strategic policy S4 and policy OF1.
148. The resulting loss in office floorspace is in breach of policies CS1 and DM1.1 of the Local Plan. A Viability Statement has not been submitted to justify the loss of office floorspace. The Court Facility and Police Headquarters would in themselves generate employment and would be complementary to the agglomeration of legal businesses and services which have clustered in the western part of the City and in neighbouring Westminster and Camden to be near to the existing Law Courts. Strategic Policy S22 Fleet Street and Ludgate seeks to promote new court facilities and a City of London Police Station recognising the area is an established legal cluster, focused on the Temples in the City and the Royal Courts of Justice within the City of Westminster. The area is identified in the London Plan as a CAZ Legal Cluster. Policy SD4 of the London Plan seeks to protect and enhance the strategic functions of the CAZ, including the legal functions of the quarter. It is considered that the public benefits created by the provision of the Police Building and Court Building outweigh the breach of policies CS1 and DM1.1 of the Local Plan.
149. The main entrance to the office building would be via Salisbury Square and would include a 244 sq.m public cycle hub (Class E) in the basement. The improved office accommodation supports the aims of Local Plan Policy CS1: Offices and would provide flexible office floorplates for workers which are designed to meet the needs of a wide range of potential occupiers, in accordance with adopted and emerging Local Plan policies.
150. Despite a significant net loss of office floorspace on the site, the overall mix of uses in the proposed scheme would strengthen the existing legal cluster in the west of the City and would therefore be complementary to the needs of the business City and to the objectives of adopted Policy CS1 and emerging Policy S4.

### Retail Uses

151. The existing site contains nine units that were in the former A1/A2/A3/A4 use class of which five of the units are on Fleet Street within the Fleet Street Principal Shopping Centre (PSC), a further three on Whitefriars Street and one in Salisbury Court. The total area of the units comprises 3,071sqm of which 2,623sqm would fall in existing E use class and 448sqm would be Sui Generis (public house). Of the

2,623sqm in E Class a total of 2,189sqm were in bank use (mainly in ancillary upper floors) leaving 434sqm in previous A1/A3 use across the site. Of 2,623sqm of existing E use class floorspace, only 831 sq.m is on the ground floor.

152. The proposed scheme would provide 230sqm of new retail Class E space in a unit located on the junction of Whitefriars Street and the new south passage, linking to Salisbury Square. A total of 943sqm of sui generis public house space is proposed to Salisbury Square. There would be a loss of 1,898 sq.m of retail floorspace of which 372 sq.m is at ground floor level in the PSC.
153. Adopted Local Plan Policies CS20 and DM20.1 prioritise A1 uses within PSCs and seek to resist the loss of retail frontage and floorspace and aims to maintain at least 70% of retail frontage within a PSC in A1 use. There would be a loss of 61m of active retail frontage across five existing units in the Fleet Street PSC. The loss of retail in a PSC is contrary to adopted Local Plan policy and the new retail floorspace provided would not be located on a PSC or Retail Link. The adopted Local Plan aims to maintain at least 70% of retail frontage within a PSC in A1 use. The changes proposed would result in the proportion of retail frontage in A1 use in Fleet Street falling to 65% which is below the 70% threshold and contrary to the requirements of Policies CS20 and DM20.1. The proposed development does not accord with Policy CS20 or DM20.1 of the Adopted Local Plan.
154. The emerging proposed Draft City Plan 2036 Strategic Policy S5 seeks to improve the quantity and quality of retailing and the retail environment, promoting the development of the City's four PSCs and the linkages between them. Policy RE1 seeks that the loss of ground floor retail frontages and/or floorspace will be resisted and additional retail provision of varied unit sizes and frontage lengths will be encouraged, supported by complementary uses that increase footfall and provide active frontages. Explanatory paragraph 5.2.12 recognises that following changes to the Use Classes Order introduced in September 2020, existing shops, premises providing financial and professional services to the public, and restaurants and cafes could be converted to a range of other Class E commercial, business and service uses without planning permission. RE1 does not take forward the frontage percentage requirement but does require the provision of active frontages.
155. Ideally, active frontages would be sought, but the nature of the proposed Court building and requirements for security does not allow for permeable and active retail frontages and it is proposed that public art will be provided on Fleet Street to enliven and activate the frontage. Although there is a loss of active retail frontage and floorspace contrary to policy DM20.1 of the Local Plan and policy RE1 of the draft City Plan, the public art provision will add interest to the new frontage which when considered alongside the public benefit that arises from the provision of an enhanced square, the proposed retail E Class unit and public house together with the new public buildings on this site, would

be acceptable as an exception to Local Plan policy DM20.1.

156. The E Class retail unit (230sqm) proposed as part of the new commercial building would be a split-level unit with two entrances directly off Whitefriars Street and a further entrance along the new south passage. The retail area activates the building's frontage along Whitefriars Street and the new southern passage which provides a new link between Salisbury Square and Whitefriars Street. The design enables a variety of retail uses, including a café or restaurant. The layout provides for flexibility allowing the area to function as either a single or dual unit, with the upper area facing the new southern passage working independently.
157. A condition is attached to the permission to secure the retail uses falling within Class E and sui generis use as proposed, and to prevent the change to commercial office use within Class E.

#### Cycle Hub

158. The commercial building would include a cycle-hub, Class E use (244sqm GIA) for public use to be located in the second basement level, accessed from the new southern passage and served by a dedicated lift. The cycle-hub would be adjacent to the retail unit. The presence of the public cycle hub could encourage a cycle shop or a cyclist café in this location. The upper retail area could be linked to the adjacent cycle hub entrance lobby in an open plan arrangement if required. In total, the Hub would be able to accommodate 169 bicycles, of which 134 would be accommodated within two-tiered parking, 14 on vertical standards and 21 folding cycle lockers. The proposed cycle-hub is in line with London Plan Policy T5, and DCP Policy W2 and W3. The provision and details of the cycle-hub would be secured by condition.
159. The hub is an innovative concept, providing a dedicated internal space within the commercial building footprint for use by visitors to the three buildings and to the wider area, and within close proximity to two major cycleways. The area would provide secure cycle parking sheltered from the elements. A cycling promotion plan will be secured by condition. In the plan the applicant would be required to detail the arrival experience and how the hub would be highlighted as a public facility. Through the plan the applicant will be required to commission a design for visitor cycle hub signage, to be agreed by the City. It is expected that this signage would be used across the City on future developments to create a consistent, legible signpost for visitor cycle parking within private developments.

#### Public House

160. The Hack and Hop Public House at 35 Whitefriars Street first opened in 2014 and was formerly known as Coach and Horses (closed in 2013). It was built in its present form in 1898 and has always been in public house use. Policy HC7 Part B (Protecting Public Houses) of the

adopted London Plan (2021) states that “Applications that propose the loss of public houses with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future”. The loss of the existing Public House would conflict with Policy HC7 of the London Plan as it is considered to be of “heritage, cultural, economic or social value” because it is an undesignated heritage asset.

161. In the emerging City Plan 2036 Policy CV1 (Protection of Existing Visitor, Arts and Cultural Facilities) it is recognised that there are many cultural facilities that are unique to the City and maintain a historic or cultural association with the Square Mile. "Special consideration needs to be given to the protection of these facilities to maintain the City's unique cultural heritage. Examples of such facilities include...historic public houses which have a heritage, cultural, economic or social value to local communities". It is recognised in the supporting text to the emerging City Plan Policy CV1 that marketing evidence will not be required if it can be demonstrated that the loss of a facility is part of a business plan to deliver improvements to another similar facility nearby.
162. A new public house sui generis use is proposed to Salisbury Square. The current environment of the Square is lacks in vitality to detriment of the character of the area. The unit would provide 943sq.m (Sui Generis) space at ground / lower ground, first to third floor levels. The main bar serving areas will be at ground, lower ground and first floor levels with second floor dining areas and third floor kitchen. The lower ground floor will also act as a bar, with daylighting from the overhead glazing and from windows opening to a lightwell to the west. The first floor south room will act as a bar/dining room for the public house. The second floor south room will act as a function room for the public house, with its own bar area. The third floor is entirely devoted to plant and to kitchens in connection with the public house and dining rooms.
163. The new public house will add significant vibrancy and vitality to Salisbury Square. It will be located on a corner bookend site with triple aspects to the south, west and east with generous entrances and fenestration providing an attractive setting on to the new car free extended public square, The pub will have its main access to Salisbury Square with further entrances in Salisbury Court. The main entrance from Salisbury Square has been designed to provide level access to a new terrace area which forms part of, and leads directly into, a new enhanced Square. The terrace will form a key feature that will bring vitality and animation into the Square whilst providing amenity space for the public house use. The existing Hack and Hop public house has 347.30 sq,m (GIA) of floorspace and the proposed new public house would deliver 957 sq m of GIA floorspace.
164. The loss of the public house in Whitefriars Street is contrary to Policy HC7 of the London Plan. The adaptation of the existing listed building at 2-7 Salisbury Square to form the new public house will ensure that a character public house unit will be reprovisioned as part of the scheme.

The new public house would significantly increase the total floor space in public house use and have enhanced accessibility directly off Salisbury Square. This is considered to be an improvement on the existing provision and when balanced against the loss of the existing public house it is considered to outweigh the policy non-compliance.

#### Medical Use

165. The application site currently houses a small-scale private medical use (127sq.m) occupying part of 2-7 Salisbury Court. The applicants are not proposing to retain this facility. The operators have other premises in the City.
166. Changes to the Use Classes Order introduced in September 2020 have included certain health and medical services such as clinics, health centres, creches, day nurseries and day centres within the new Use Class E. This means that such uses could be converted to a range of other Class E commercial, business and service uses without planning permission.
167. Policies CS22 and DM 22.1 of the 2015 Local Plan and S1 of the Draft City Plan 2036 seek to resist the loss of public health facilities, where there is a need for such facilities, and encourage the provision of public and private health facilities. Policy CS22 of the Local Plan and policy S1 of the Draft City Plan recognise that it is not feasible to protect private health facilities, which respond to market demand. The loss of the existing medical floorspace is therefore considered acceptable.

#### New Public Realm

168. Local Plan policies CS19 and DM19.1, draft City Plan 2036 policies S8(3 and 5), OS1, S14 and D3, London Plan Policy 7.18 and London Plan Policies D3, D8 and G4, seek to increase the quality, quantity and accessibility of public open space, including new streets and routes in places, such as Salisbury Square and the new North and South Passageways, where there is a deficiency of open space and significant pressure on the streets. As a scheme including a public building and Police building the scheme has very successfully maximized public access throughout in a permeable, inclusive, diverse and logical manner. Salisbury Square is increased in size by approximately 100% and an increased amount of high-quality greenery will be introduced. The two east-west pedestrian routes will be step-free and will incorporate greenery at ground level and on the building elevations.
169. The scheme delivers a 42% increase in public realm across the development providing 1,786 Sq. m accessible space. The proposed Salisbury Square has been increased in size to provide a public space measuring 25.2 m wide by 43.6 m length with a total an area of 1,092 Sq. m (fully pedestrian) increasing the pedestrianised area in the public square by almost 100%.
170. The existing routes through the site Hood Court is 2.80 m wide and

Hanging Sword Alley is 1.60 m to 2.35 m wide. The new Northern Passageway would provide significant increase in accessible footway and would be measure 7.75 m wide narrowing 5.10 m. The proposed Southern Passageway would provide a new route which would 5.78 m at its widest point narrowing to 3.62 m wide where the public lift is located. The two east-west pedestrian routes provide significant improvements and be will be step-free and will incorporate greenery at ground level and on the building elevations.

## **ARCHITECTURE AND URBAN DESIGN**

171. The site comprises three separate new buildings of the highest architectural quality, which are appropriately designed to be distinct but complementary in expression and respond to the distinctive eclecticism and family of high-quality buildings from all ages in Fleet Street. Fleet Street is dynamic, has developed organically and has a 'loose fit' urban structure, eclectic in character and which has continuously evolved over time. The buildings are anchored by the surrounding streets and respect and reinstate historic building lines, repairing the damage done to the urban fabric by the alien Fleetbank House, reinstating a hierarchy and structure to the urban grain which would be an urban design benefit to the Fleet Street Key Area of Change. The transformed public realm, including an expanded and reinvented Salisbury Square, would create a new civic square for the CoL, in an area in much need of additional public space, properly enclosed and animated by a reimagined 2-7 Salisbury Court. The new uses would be hardwired into the DNA, and associated character, of the Fleet Street/Temples area, nationally and internationally recognized as a centre for legal excellence.
172. The three new buildings have multifarious elevations which appropriately reflect their use and function, suitably scaling and enclosing the various public realms and offer an architectural honesty along facades which are well-considered, modelled, articulated and detailed to build on local character. The spaces between the buildings include Salisbury Square and the two new east/west pedestrian routes which lead from Whitefriars to Salisbury Square and would significantly improve connectivity linking through to existing surrounding arteries. The public realm is central to the success of the scheme and embeds the development into its historic setting and would reinforce a sense of place.

### **Proposed Court Building height, massing and design detail**

173. The architecture reflects the buildings civic status with honesty and would introduce a new layer of grand monumentality to Fleet Street continuing the legacy of Fleet Street as an evolving organic distinct place in the heart of the City of London.
174. The Court Building reflects its judicial function in its form as a landmark

building which is fit for purpose reflected through its massing, use of exceptionally high-quality traditional materials and a specification which is fit for purpose with a 125 year life span and classical style. The architecture would distinguish itself through its, coherent well-proportioned composition, sense of integrity and clear institutional identity which would successfully integrate at a local and citywide scale.

175. At a macro scale the urban morphology of the City steps down in building scale from Holborn towards the river and the Court Building would integrate into this traditional historic urban layering as experienced from the southbank and river bridges. Along Fleet Street the building height (54m) and massing would be a compatible addition to the cluster of 20th-21st century buildings with larger floorplates and coarser urban grain including Reuters Building, Daily Express Office and Daily Telegraph /Peterborough Court.
176. This local townscape context is characterised by a vertical rhythm and by plot sizes reflecting narrow but also larger floorplates. Naturally the court function necessitates a building with a significant plot size. The single extended frontage would be a bold insertion but similar in scale to the Royal Courts of Justice. As Fleet Street is relatively narrow the building would often be experienced in oblique views foreshortening the frontage and the massing has been articulated to mitigate any adverse impacts of perceived visual. The pleasing inflected façade articulates the elevation into clear components which have a nuanced verticality. Hierarchy and vertical components are further reinforced by the ordered grouping of windows different proportions. The upper floors are elegantly stepped back with east and west pavilions and central concave recess. The uppermost floor opens onto a planted roof terrace with intensive green roof and urban greening that would be publicly visible in long views east and west softening the grandeur of the architecture.
177. Architecturally the Fleet Street frontage would reference the grade II listed Reuters Building to the east. The Court Building has a defined hierarchy, anchored robust base and diminishing proportions. The composition is simple and calm with a classical arrangement of a grand portico entrance topped with a large central oriel bay to include artwork; deep recessed window openings; chamfered corners and strong cornice lines along the front and flank elevations.
178. The central projecting bay with intricate glazing panels and inscription defines the important public portal entrance to a civic use increasing legibility and symmetry reinforced by large columns and street trees. The ground floor level contains a central spine of public spaces; the central entrance, public foyer and feature sweeping oval staircase, which would be linked by views into the building from Fleet Street on the north elevation and out on to the proposed new northern passage at the southern end. This visual permeability would positively contribute to Fleet Street and the north passage, promoting activation, animation and public engagement with buildings function.



179. The elevations to Salisbury Square, Whitefriars Street and Salisbury Court are well proportioned with detailed facades which respond to the distinctive architectural and spatial characters. The south elevation would be five storeys with recessed upper floors and with the Police Building would enclose a newly created pedestrian passage connecting to Salisbury Square. This elevation is well conceived referencing an arts and crafts idiom featuring a series of stacked oriel bays and dramatic vertical ribbon windows. This elevation is intimate and animated and has a more human scale contrasting with the grandeur of the Fleet Street elevation and would enclose a d.
180. The flank elevations are simpler versions of the main facade and the chamfered corners would soften the edges of the building and invite attractive views and draw pedestrian activity into Salisbury Square and Whitefriars Street and into the new north passage. The east elevation would align with the restored 2-7 Salisbury Court and the Court Building massing would step down to the listed building mitigate the abrupt transition in scale and contrasting juxtaposition of buildings typologies and materials.
181. All facades would be faced in a sophisticated monochromatic palette of light-coloured traditionally constructed in a granite base and limestone body complemented by dark metal window fretwork and detailing, sculpted granite windowsills and engravings emphasizing the gravity and permanence of the Court Building. The limestone would be handset following traditional craftsmanship with narrow joints. The quality and choice of materials would integrate the building into the rich palette of materials of Fleet Street and which would relate particularly well to the Reuters Building.
182. As far as possible the elevations facing the public realm optimize active frontages however the HMCTS Design and security requirements limit windows to above 6m. This results in an extended secure and robust granite base and to mitigate impacts a series of large art panels will be commissioned as part of the Cultural Plan to adorn the Fleet Street frontage and provide visual interest and further decorative elements celebrating the history Fleet Street are proposed to the south elevation animating the north passage.
183. Further security measures to the public realm include security walls and bollards rising to over a meter set in front of the Fleet street elevation. However, the recessed entrance and inflexion wings of the building would pull back from the road widening the pavement on the north elevation which would enhance pedestrian comfort and provide ample space for activity around the main entrance.
184. The mechanical plant has been integrated successfully into the building envelope and is stepped back and be recessive.
185. The Court Building would be a high quality grand civic building which would exert its purpose through its monumental legible and meticulously detailed form. The building would enrich the already diverse character of Fleet Street through architecture and function.

The Building is innovative in terms of its internal layout and would enable greater access and engagement for the public to judicial operations. The Court Building would set a benchmark for HCMTS buildings in terms of design and operation and would be a worthy and long-lasting addition to the Fleet Street townscape.

### **Proposed Police Building height, massing and design detail**

186. The Police Building would positively transform and mend the fractured townscape of Whitefriars and Salisbury Square townscape replacing Fleetbank House with high quality legible architecture. The building would be attractive, contextual, outward facing and inclusive enhancing the setting of existing and engaging with new public realm and delivering active frontages. The Building would integrate well with the scale of the proposed Court and Commercial building in the masterplan complex and be compatible with the urban townscape at a city-wide level from river bridges and the southbank and at a micro scale.
187. The building presents a nine storey rectilinear compact block with recessed upper floors. The massing and height (62m) have been informed by its macro impacts particularly to mitigate impacts to St Bride's in LVMF views. In a local context the footprint, plot width and massing would be significant but would blend into the network of streets and urban grain to the south of Fleet Street characteristic by buildings of different buildings periods with larger floor plates and increased height and a rich palette diverse building materials. Due to the location of the Police Building significant visual impacts are limited to the tight local context of Whitefriars Street, Salisbury Square and Carmelite Street.
188. The main body of the building has a weathered steel exoskeleton to all elevations. These facades would be layered with geometric ceramic spandrel panels and glazed curtainwall behind the weathered steel structure which would be detailed with a bright red brise solei, creating depth and interest. The vertical elements of the weathered steel would rise to roof level surmounted by finials proud of the glass balustrade creating a decorative parapet and silhouette. The massing would diminish on the uppermost levels including plant enclosure and office spaces with an external private roof terrace supporting the wellness of police staff and solar panels mounted onto a green biodiverse roof. Holm oak trees would be planted between window openings to extend the height at this uppermost which would soften the overall appearance which would be experienced from the public realm and in long views.
189. The highly glazed ground floor facing Salisbury Square is the welcoming portal for the City of London Police and the Police Station and is engineered to deliver security requirements as well as transparency to provide a civic and active presence to Salisbury Square. The solidity on the ground floor to other elevations, is designed around the security requirements. Green walls to the south and north elevations would add visual interest and lushness to these elevations which enclose public routes complementing the wider public realm

proposals. The corner of the building on the Whitefriars elevation and the north passage is cut back to provide an innovative winter 'heliostat' winter garden. A curved polished stainless steel soffit would arch over planting and lightwells bringing light to lower ground custody floors. The surface of the stainless steel soffit would reflect an abstract mirror image of the planting beneath, creating interest and visual amenity at pedestrian level. Details would be finalised as part of a Cultural Plan. This installation would bind the greening round the base of the building. This would soften and add interest to interface between the public realm and the building as well as minimise the impact of the rapid response vehicular access which is integrated into the functionality of the building.

190. The proposed building materials would be durable and of high quality. The raw rust patina of the weathered steel would complement the red brick masonry characterful of the Whitefriars Conservation Area to the south, 2-7 Salisbury Square and the proposed commercial building clad in a rich terracotta faience. The masonry spandrels and granite proposed at the base would connect the Police Building with the Court Building palette.
191. The proposals would be a worthy headquarters for the City of London Police setting a new benchmark for effective modern policing in the City of London as well as nationally which aspires to be transparent, accessible and inclusive. Architecturally the design is well conceived and would significantly enhance the setting of Salisbury Square the surrounding new public routes and spaces as well as mend the disjointed Whitefriars Street townscape.

### **Proposed Commercial Building height massing and design detail**

192. This would be a distinguished building with particular attention to decorative detail delivering excellent quality office space, two floors of retail at ground and lower ground and access to an underground cycle hub. The architecture and layout would complement the Police building repairing the Whitefriars townscape, enhancing public realm and replacing Fleetbank House with a high quality crafted architectural response addressing a difficult site which straddles varied topography. The building would be a successful addition to townscape at a local and citywide scale blending into the urban layers.
193. The building height (47m) and massing like the Police Buildings is informed by its context and the site constraints mitigating potential impacts on LVMF views and St Brides Church. The building steps down in scale towards the south creating two tiers responding to the sites level changes between Salisbury Square and Whitefriars Street as well as responding to the local scale of the adjacent Harrow Public House. The massing is broken up by the folding geometry of the west elevation as experienced on Whitefriars Street which steps back from the Police Building and opens up a wider public route leading to Salisbury Square. Due to the location like the Police Building the significant visual impacts are limited to its tight local context of

Whitefriars Street and Salisbury Square and from Carmelite Street.

194. Externally on all elevations there is a defined hierarchy, verticality and structural rhythm expressed through the materiality. The lower level structure with wide bays in the façade would support upper storeys of smaller proportions of windows which creates a sense of hierarchy to the building's composition.
195. The development would have active edges to all elevations. The retail unit would span the north west corner of the building and occupy two floors where the change in levels join and the lower ground floor is exposed on Whitefriars Street. The elevations would be glazed floor to ceiling and would animate the public realm. The cycling hub would be public and would have a prominent entrance onto the pedestrian southern passage, alongside the office cycling entrance and retail entrance, animating the public realm and creating an inviting arrival experience which promotes active travel. The orientation of the building allows a prominent corner entrance for the office on the junction of Salisbury Square and the southern passage. The ground floor building line would chamfer into a recess revealing a corner soffit which turns up into the façade, creating a lip and beautifully detailed with a ram pressed panel and fluted columns to the ground.
196. The relationship between the service bay on Whitefriars street and Harrow Public House (grade II) has been carefully considered. The domestic proportions of the listed building align through to the elevational treatment of the servicing bay and where the south west corner of the office building chamfers and recesses a soffit of corbels would cascade down to the gated entrance. These touches of ornamentation and consistent attention to detail would create visual delight in the public realm as well as emphasise the human scale and intimate atmosphere of narrow streets characterful of historic buildings and street patterns in the neighbouring conservation areas.
197. The materials would be high quality, durable and applied in a crafted and considered manner to give the building a strong but elegant identity. The building distinguishes itself with a decorative refined detail featuring a signature ram pressed terracotta spandrel panel on all elevations. The spandrel panels are set perpendicular to fine vertical fins clad in moulded terracotta tiles which create a rhythm and depth to the façade. The detailing continues up the building where the terracotta fins extend beyond the roof line to create decorative finials which would be coherent details echoing the Police Building parapet.
198. A new covered public through route connecting Primrose Hill to Whitefriars is proposed to separate the Commercial Building and the Harrow Public House with a brick elevation bridging the two buildings. This would set back the height and massing of the Commercial building, recess the building perimeter in line with the listed building and improve its setting as well as improve urban pedestrian permeability.
199. The plant has been well integrated into the architecture; the intensive

green roofs would contribute to the climate resilient urban greening and the office spaces would be adaptable to changing tenant needs over the lifetime of the building and would provide high quality amenity.

200. The Commercial Building is a sophisticated and a commendable thoughtful response to a complex and challenging site delivering high quality office space. The development would enhance and respond to the distinctive architectural spatial characteristics of scale, urban grain and proportions. The building would sit comfortably in the context of existing neighbouring building bringing a richness of detail and decoration which would enhance the existing townscape as well as complement the wider masterplan proposals.
201. Lighting, in accordance with the adopted City Lighting Strategy, is proposed to enhance visual amenity and minimise light trespass for each building and for the public realm. It would be contextual, building on the components of spatial character design guidance for Fleet Street in the adopted Strategy. The full details would be ensured via condition.

### **Proposed Landscaping and Public Realm**

202. The development proposes a number of public realm enhancements, centred around an enlarged and improved Salisbury Square. Two new east-west pedestrian routes are proposed to replace existing pedestrian routes: Hood Court and Hanging Sword Alley between Fleet Street, Whitefriars Street and Salisbury Square; and a staircase between Primrose Hill and Salisbury Square. The pedestrian environment on Fleet Street would be improved.

### **Changes to Salisbury Square**

203. Salisbury Square is an informal, square shaped space on the west side of Salisbury Court and Dorset Rise characterised by a central area of seating and greenery set around the Obelisk to Robert Waithman and encircled by carriageway used by vehicles with parking places. The existing landscape design was carried out in 1989 to mark the 800th anniversary of the mayoralty of the City. It is the site of the internal Great Court of the Bishop of Salisbury's Inn, and has been an open area since at least the 12th century. The square is little changed and maintains its historic form.
204. The development proposes to enlarge and reconfigure the Square northwards, creating a new civic space which would facilitate pedestrian movement through the local area whilst also providing a space to meet and dwell. Vehicle access would be prohibited except for occasional maintenance requirements; a small number of removable bollards would allow access and the design of the space has taken this into account. The proposed Square would increase in length from 31.5m to 43.6 and reduce in width from 27m to 25.2m. This, with the proposed removal of the existing road, would increase pedestrian space by 97%. The existing area of Salisbury Court is 554 sq m, not including 296 sq m which is road. The proposed area is 1,092 sq m

which would be pedestrian.

205. The primary design feature of the Square comprises five large planters which would be shaped to provide enclosure and a more human scale, creating a quiet character with adequate room to dwell. All of the planters would be formed of natural stone and feature integrated timber seating. Three of these planters are broadly aligned along the western edge of Salisbury Court and are planted with multi-stem trees and generous underplanting which would ensure that a swathe of green is visible in views from Fleet Street and Dorset Rise, which would be revealed and emphasised by the gentle curve and steep incline of the carriageway. The design would extend to Salisbury Court to the east of the square which would reflect its historic, medieval footprint. On the north side of the square the historic building line would be marked in marble with brass inlay lettering.
206. The remainder of the hostile vehicle mitigation infrastructure is provided in the form of bollards interspersed between the planters, and a small wall at the northern end of the Square. This approach ensures the Square would be secure whilst also being inviting and accessible.
207. The Square would be predominantly paved with York stone, and the carriageway in Salisbury Court would be laid to granite setts, in line with the City's standard palette of materials. A grid pattern is proposed across the space, giving a distinctive character to the enlarged square. The proposed grid extends across the main square and the carriageway, reintroducing the idea of a public space that extends across the pavements from one facade to another. The Square would be fully accessible and, as traffic would be excluded, become a place for pedestrians and cyclists.
208. The new south elevation of 2-7 Salisbury Square on the north side of the square would have an entrance to the Square. The proposed public house would provide additional animation and activity and draw pedestrians and visitors into the area. The design of the new south elevation would enhance the north side of the square and its authentic, historic design and use of materials would complement the contemporary design of the Police Building and the Commercial Building, enhanced by landscaping.
209. The Obelisk to Robert Waithman would be moved to the east of its existing position and its landscaped setting would provide a focus in the square complementary to its informal character and plan form. The proposed design and appearance of Salisbury Square makes a significant contribution to the setting of the listed Obelisk, the listed 2-7 Salisbury Court and the Fleet Street Conservation Area.
210. Additional features in the Square comprise cycle parking positioned at intervals throughout the space, a water refill point, and a small set of feathered steps adjacent to the security wall. It is considered that the proposals for Salisbury Square would deliver a landmark, civic space in this part of the City.
211. The enlargement of Salisbury Square and the new north and south

passages would increase the amount of public realm on the site. There would be enhanced pedestrian permeability with generous, wider routes between Fleet Street, Whitefriars Street, Primrose Hill and Salisbury Square. There would be a new, significant view of St Bridges Church Spire from the north passage and new views through and into the Square. The repositioned Obelisk would retain its role as a focus in the Square and would provide a new focus from Fleet Street, Whitefriars Street and Dorset Rise.

#### Proposed Northern Passage

212. A pedestrian passageway would be introduced towards the north of the site, replacing the existing route of Hanging Sword Alley, between the Court and Police buildings. Hood Court would not be retained as the proposed Court building would extend between Fleet Street and Whitefriars Street. Hanging Sword Alley was widened when Fleetbank House was constructed and has hard landscaping with a circuitous stepped route between Whitefriars Street and Salisbury Square, the only public amenity being a modest amount of cycle parking.
213. The new 8m passage would provide a more direct, step-free, open connection between Whitefriars Street and Salisbury Square. The alignment of the route would open up obscured views of St Bride's church spire, providing an attractive vista looking eastwards of a key City landmark and a positive contribution to the character of the area. The route would be paved to Yorkstone throughout and would be partially flanked by green walls on the Court and Police buildings. Approximately 16 cycle racks would be provided at intervals along the centre and at the eastern end of the passageway.
214. Two granite-clad structures are proposed to be interspersed along the centre of the passageway. These would be ventilation terminals for the parking areas below. Both granite-clad structures are approximately one to one and a half metres in height. The detailed design of the structures and ventilation would be covered by conditions.

#### Proposed Southern Passage

215. A new pedestrian route is to be created between the Police and Commercial buildings, providing an additional connection between Whitefriars Street and Salisbury Square. The width of the proposed South Passage is 5.78m and 3.62m where the lift would be located.
216. A level difference of almost three metres between Whitefriars Street and Salisbury Square is overcome through the provision of a platform lift in the centre of the passageway, which would be flanked by two flights of steps. The inclusion of a lift would provide step-free access for pedestrians using this route. The passageway would be paved to Yorkstone providing continuity between the various spaces.
217. Along the centre of the passageway a number of trees would be planted in the ground, with additional low-lying greenery

complementing a green wall along part of the southern elevation of the Police building. This greenery would provide an inviting and intriguing entrance into the passageway at the western end, ensuring that it is attractive and well used.

218. The proposed relocated Obelisk to Robert Waithman in Salisbury Square would be a focal point and landmark in the view along the South Passage from Whitefriars Street. This would add interest to the new route and a positive contribution to the character of the area, enhancing the visual connectivity between Salisbury Square and Whitefriars Street.

#### Changes to Primrose Hill (including new passage to Whitefriars Street)

219. Primrose Hill will be reconfigured to provide the required servicing access for the new site, whilst also retaining existing servicing access for 8 Salisbury Square. The existing environment of Primrose Hill is uninviting, with a narrow, partially obscured flight of steps connecting to Salisbury Square, adjacent to a vehicle turntable contained on a small area of permissive path. The pedestrian route, which is currently designated as public highway, will be extinguished, although the loss is mitigated through the provision of the new Southern Passage.
220. The existing vehicle entry to the site from Whitefriars Street will be retained to provide servicing access, although this will be adjusted so as to link into the existing service access from Primrose Hill to 8 Salisbury Square. Two sets of automatic rising bollards will be installed, allowing both the site and 8 Salisbury Square to be serviced and managed independently.
221. A new covered pedestrian alleyway will be introduced along the southern edge of the new service access route, adjacent to the existing Harrow public house, creating a pedestrian link between Whitefriars Street and Primrose Hill. Owing to level differences the route will incorporate steps and will therefore not be fully accessible. The route will be adequately lit in accordance with the City's adopted Lighting Strategy, ensuring a safe and inviting environment.
222. The retention of vehicular access on Primrose Hill limits the potential for enhancements. A small amount of greenery may be possible and will be explored through the discharge of the landscaping condition. The footways will be laid to Yorkstone.

#### Changes to Fleet Street, Whitefriars Street, Dorset Rise and Salisbury Court

223. The primary entrance to the Court building will be on Fleet Street and as such will be a high profile frontage. It is proposed to retain the existing layout of Fleet Street, incorporating security-rated bollards along the kerb edge as part of the wider security strategy for the site. The bollard line will be interspersed with granite plinths which will serve as informal seating. The bollard line runs along the full length of the site and also continues a short distance eastward beyond Salisbury Court; this configuration is deemed necessary to provide adequate protection



to the site and its users.

224. The final layout of Fleet Street will be subject to further detailed design, secured by condition. Options for widening the footway will be explored in parallel with the Healthy Streets Plan for the wider area. Such widening would require the removal or reconfiguration of the existing Traffic and Environment Zone measures on Fleet Street (a.k.a. the 'Ring of Steel'); discussions to this effect are ongoing with the City of London Police.
225. Two street trees are also proposed adjacent to the entrance to the Court building. Whilst the trees would provide visual amenity otherwise lacking on Fleet Street, their proposed location may obstruct pedestrian movement and so the final location of any trees will be determined through the Section 278 process.
226. A raised table will be introduced at the junction of Fleet Street and Salisbury Court. The table will continue southwards along the full length of Salisbury Court to a point south of Salisbury Square. The extensive section of raised carriageway will add to the perception of Salisbury Square as an expansive civic space, continuing the sense of pedestrian priority and further facilitating east-west pedestrian movement via the two existing passageways connecting to St Bride's Passage and St Bride's Avenue. The carriageway will be laid to granite setts in accordance with the City Public Realm technical manual, and the existing disabled parking bays on Salisbury Court will be retained.
227. Whilst two-way traffic is currently permitted on Dorset Rise as far as Salisbury Square it is proposed to introduce a southbound one-way restriction along the full length from Fleet Street to Hutton Street. A contraflow cycle lane would be established with a new island proposed adjacent to Hutton Street to positively demarcate the start of this contraflow.
228. The proposed servicing activity for the site, including the deployment of rapid response vehicles, will take place from Whitefriars Street. Consequently the operation of Whitefriars Street will be adjusted, with the street being made two-way south of the Police vehicle rapid response exit; the northern section of Whitefriars Street will remain northbound only for vehicles with the existing contraflow cycle lane retained. These changes are made possible through the slight setting-back of the building frontages and the narrowing of the footway at the southern end of Whitefriars Street, allowing adequate space for two-way vehicle operation.

### **Impact on Heritage**

#### **Principle of Demolition: including effect on Non Designated Heritage Assets**

229. The proposed scheme would involve the demolition of six buildings, which are considered to be non-designated heritage assets, which are: 72-78 Fleet Street Chronicle House, 80-81 Fleet Street, 8 Salisbury Court, 1 Salisbury Square, 35 Whitefriars Street and 36-38 Whitefriars

Street. In addition three historic pedestrian routes would be altered or lost including Hood Court, Hanging Sword Alley and Primrose Hill. These are also identified as non-designated heritage assets because the buildings and spaces have a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets

#### 72-78 Fleet Street, Chronicle House

230. The building was built in 1923-1924, an early work by the known architect, Herbert Owen Ellis who designed other buildings for the newspaper industry in the area. It fronts the principal route of Fleet Street, and the Processional Route, from dates from the early 20th century widening of Fleet Street. The rear elevation faces Hanging Sword Alley. It is a commercial building, constructed as newspaper offices, with ground floor retail. On the west side, Hood Court is a covered passageway between Fleet Street and Hanging Sword Alley.
231. The building is in a traditional, classical style, constructed of white cast concrete, imitation stone. The elevation has seven bays divided by flat pilasters supporting a heavy cornice. The two end bays are plain, and the five central bays have wide windows with coloured metal spandrel panels and there are two roof stories set back from the elevation. The rear of the building has glazed bricks and metal windows. At ground floor level there is a bronze bust of the journalist T P O'Connor, 1934, by F. Doyle Jones and accompanying bronze plaque. There is a City of London Blue Plaque marking the site of Bradbury & Evans, Printer and Publisher of Dickens and Thackeray, 1847-1900. These are important elements of the townscape which provide interest and commemorate the significant history of publishing, newspaper and journalism of this area.
232. The building is visible in short and long views to the east and west along Fleet Street and of St Brides spire. It makes a significant contribution to the character and appearance of Fleet Street Conservation Area in terms of its design, date, materials, and massing and has group value with 80-81 Fleet Street. The design of the elevation into bays provides interest and is sympathetic to the medieval plot width divisions which are characteristic of Fleet Street. The rear elevation is now more visible as Hanging Sword Alley has been widened; when constructed, the rear faced a narrow passageway.
233. The commercial and retail uses make an important contribution to the vibrancy and amenity of the area and the loss of retail function would cause harm to the character of the Fleet Street Conservation Area. The existing non designated heritage asset is of moderate significance and the demolition would result in total loss of significance.

#### 80-81 Fleet Street

234. The building was built in 1924 by architects C. J. Dawson, Son & Allardyce. It is on a prominent site on the corner of the principal route

and Processional Route of Fleet Street and Salisbury Court and dates from the early 20th century widening of Fleet Street.

235. It is a commercial building with a bank at ground floor and offices above. The building has a rich and heavily modelled design, with a heavy rusticated ground floor, double height pilasters, string course and cornice line, detailed dormers and roof line. The high ground floor windows and raised ground floor are typical of a bank or other commercial building of this date. Its traditional Classical design and Portland stone materials are in keeping with the character of Fleet Street and it is a good example of a commercial or bank building of the time. The building is visible in long and short views east and west along Fleet Street, of St Bride's spire, and in north and south views in Salisbury Court. It has group value with Chronicle House 72-78 Fleet Street and 2-7 Salisbury Court. The commercial uses make an important contribution to the activity and vibrant character of Fleet Street.
236. There is a City of London Blue Plaque on the Fleet Street elevation, commemorating the Fleet Street conduit, which stood opposite the building from 1388-1666. It is an important element of the townscape which adds interest and commemorates civic improvements. The building has a robust visual appearance in keeping with its' prominent corner site and makes a significant contribution to the character and appearance of Fleet Street Conservation Area in terms of its design, date, materials, and massing and has group value with 72-78 Fleet Street and enhances the setting of 2-7 Salisbury Court and Reuters Building.
237. The non-designated heritage asset is of high significance and the demolition would result in total loss of significance.

### 1 Salisbury Square

238. The building was constructed in the 1960's by architects Trehearne, Norman Preston and Partners, and is a scholarly rebuild of an early 18th century war damaged building, a survival of a once typical building in this area. It has a prominent corner location facing the north side of Salisbury Square and the west side of Salisbury Court. The building is in commercial use, with a central front door, regular window openings with sash windows and an open lightwell with railings facing Salisbury Square. The elevations are built of brown brick with red brick dressings to the windows and flat corner pilasters. It has a ground floor and three upper stories, with shallow string courses at each floor level and terminating in a solid parapet at roof level. Its' design, height, scale, materials and massing give it a domestic appearance and human scale.
239. The building contributes to the character and amenity of Salisbury Square and the character and appearance of the conservation area. Its domestic appearance and design are pleasing and compatible with the scale and character of Salisbury and Salisbury Court, which have a

quiet secluded character in contrast to the vibrancy of Fleet Street. It affects the setting of the Grade II listed Obelisk to Robert Waithman and Grade II 2-7 Salisbury Court. The building is prominent in, and contributes to a number of local views, including within Salisbury Square, towards and from Fleet Street and looking north from Dorset Rise.

240. The existing non designated heritage asset has a moderate significance and the demolition would result in total loss of significance.

### 8 Salisbury Court

241. The building was constructed in 1874 to the design of Sextus Dyball. Research carried out by the applicant suggests that it was rebuilt in 1920. It has a very narrow façade with wide, full height windows on the upper floors, divided by decorative columns, and set between rusticated stock brick piers. The ground floor is in commercial use as a café and the shopfront has original pilasters and entablature. The rear elevation is not visible as it is obscured by the east wing of Fleetbank House, from which it is separated by a narrow lightwell.
242. 8 Salisbury Court makes a positive contribution to the character and appearance of the conservation area and to the streetscape. It meets many of the typical characteristics of the area, reflecting a medieval plot width and historic building line, has architectural interest in terms of facade composition and materials and the fine urban grain which typifies the side streets leading off Fleet Street. It affects the setting of 2-7 Salisbury Court and relates well in terms of materials and height to 1 Salisbury Court. The existing non designated heritage has a moderate significance and the demolition would result in total loss of significance.

### 35 Whitefriars Street

243. The building was built as a public house in 1897-98 by B. Wilkinson and remains in that use. It has five stories with a red brick façade with stone dressings to the lower floors, an ornate ground floor and a rich elevation with varied window pattern and detailing, in a simplified Queen Anne style. The first and second floor windows have square heads and the central bays are emphasised by being more closely spaced. The third floor has rounded headed windows. Although it has lost some architectural details and embellishment the building retains the robust appearance, character and interest of a public house of its date.
244. The building and its neighbour 36-38 Whitefriars Street retain the traditional and historic scale and form of the street with its narrower plot widths and typify buildings in the side streets to Fleet Street. The use of traditional materials and sympathetic scale adds interest to the street which is otherwise characterised by large modern development.
245. There is a rear elevation to Hanging Sword Alley which, when built,

would have been seen obliquely, as Hanging Sword Alley was later widened, revealing the elevation. The building is visible in, and makes a contribution to, views from Fleet Street looking south and looking north along Whitefriars Street towards Fleet Street.

246. The use of the building as a public house contributes to the interest and vibrancy of the street and this part of the conservation area. It is one of a number of public houses in this area which, with commercial uses, make an important contribution to the character of the wider area and the conservation area. Their existence and the use animate the street for local workers and visitors to the area. The existing non designated heritage asset has a moderate significance and the demolition would result in total loss of significance.

### 36-38 Whitefriars Street

247. The building is thought to have been built in 1906 to the design of Green, Lloyd and Adams, however the evidence for this is limited. The north and west elevations face Hanging Sword Alley. The building has a ground floor, five upper stories and a mansard roof. It is faced in brick with painted stone dressings to the windows and string courses, with a projecting moulded cornice above the first floor. The west elevation to Hanging Sword Alley has painted brick work with two projecting bays at ground to second floor and ground to first floor. Although the ground and first floor elevation have been altered and a mansard roof has been added, the building height, scale and materials are characteristic of streets leading from Fleet Street. The building and its neighbour 35 Whitefriars Street retain the traditional and historic scale and form of the street with its narrower plot widths and typify buildings in the side streets to Fleet Street. The use of traditional materials and sympathetic scale adds interest to the street which is otherwise characterised by large modern development. The rear elevation to Hanging Sword Alley would, when built, have been seen obliquely, as Hanging Sword Alley was later widened, revealing the elevation.
248. The building is visible in, and makes a contribution to, views from Fleet Street looking south and looking north along Whitefriars Street towards Fleet Street. The site has an historic association as it was formerly part of a larger shop and printing office, at 69 Fleet Street, where the 'Penny Black' stamp was developed. The Whitefriars Street elevation has a low significance and the demolition would result in total loss of significance.

### Existing pedestrian alleyways

249. Hood Court, Hanging Sword Alley and Primrose Street are historic pedestrian alleys with a medieval origin although Hanging Sword Alley has been widened and realigned on its south side. This network of back streets are fundamental to the integrity character and appearance and are part of the finer urban grain of the Fleet Street CA.

250. The quality of the alley ways are poor and unsafe and significantly harmed by Fleetbank House which overshadows and encloses the routes. The significance of the routes are evidential and historic and they have low heritage significance and their demolition would result in total loss of significance. The significance of the routes are evidential and historic and they have a low heritage significance and their demolition would result in total loss of significance.

### **Impact on existing buildings: Neutral Buildings**

#### **69-71 Fleet Street**

251. The proposed development would involve the demolition of 69-71 Fleet Street which is in Fleet Street Conservation Area and is not a non-designated heritage asset.
252. The building dates from 1983-85 and the architect is Thomas Saunders and Partners. It is in a prominent position on the corner of Fleet Street and Whitefriars Street, with a south elevation to Hanging Sword Alley. On the east side, Hood Court is a covered passageway, between Fleet Street and Hanging Sword Alley.
253. It is a commercial building with ground floor retail uses. The Post-Modern design has exaggerated architectural features and alternate horizontal bands of windows and metal spandrel panels. The rear elevation is plainer. The building is visible in short and long views to the east and west along Fleet Street and of St Brides spire. The height, mass, design and materials make a neutral contribution to the character and appearance of the conservation area.
254. The ground floor retail uses make a positive contribution to the activity and vibrant character of Fleet Street, as a principal route and the Processional Route, and provide a human scale to the building. There is no objection to the demolition of this building as it makes a neutral contribution to the character and appearance of the conservation area.

### **Impact on existing buildings: Detracting buildings**

#### **Fleetbank House**

255. The loss of the building would not cause harm to the setting of the conservation area and would provide an opportunity to enhance this key corner site and the setting of this part of the conservation area.
256. The proposed scheme would involve the demolition of Fleetbank House and 2-6 Salisbury Square which are on the boundary of Fleet Street Conservation Area and affects its setting. The building was built in 1971-75 by the architect C Edmund Wilford & Sons. The building is faced in grey granite and is an uncompromising modern design with a strong horizontal emphasis and repetitive floor levels. The design and massing do not respond to the topography and steep slope from Fleet Street to Tudor Street. The elevations facing Salisbury Square and Whitefriars Street are higher than the neighbouring buildings to the

north and east and there are lower wings on the north and south sides of Salisbury Square with passageways to Hanging Sword Alley and, via a staircase, to Primrose Hill. The building is partly set back from the historic building line in Whitefriars Street and a triangular area at elevated ground level has mature planting including trees and shrubs.

257. The building was built on an amalgamation of several historic building plots and the historic pattern of alleys was realigned, resulting in the widening of Hanging Sword Alley and the part covered flight of stairs between Salisbury Court and Primrose Hill. The east elevation to Salisbury Square follows the historic building line. It is prominent in views from Salisbury Square, Whitefriars Street and looking south from Fleet Street, and its' dominant appearance is in contrast with the finer urban grain and traditional materials of its neighbours.
258. 256. The building is detrimental to local views, the setting of the Fleet Street Conservation Area and the Grade II listed The Harrow Public House. Its construction resulted in the realignment and widening of Hanging Sword Alley, eroding the historic street pattern and character of courts and alleys. The demolition of the building would not cause harm to the setting of the neighbouring designated assets and would enhance local townscape and setting of surrounding designated heritage assets and townscape.

### **Direct Impact on Designated Heritage Assets:**

#### **2-7 Salisbury Court (Grade II)**

259. The proposals would have a direct impact as a result of physical alteration of the asset and the proposed new build and surrounding would affect its setting. Direct impacts are subject to a separate application for listed building consent which are also for determination (ref: application reference 20/00998/LBC).

### **Significance and contribution to setting**

260. The primary significance of 2-7 Salisbury Court is derived from the ornate street-facing elevation of rubbed red bricks and terracotta dressing. The building dates from 1878 to the designs of Alexander Peebles (1840-1891) and is a Queen- Anne-Revival style commercial building. The building is a fine example in the Norman Shaw manner combining sash windows, leaded lights, Dutch gables, pargetted soffits and terracotta decoration in Dumfries sandstone. The building was originally used as newspaper offices, in addition to printers and publishers and was originally larger and included 80-81 Fleet Street as well as 1-7 Salisbury Court. During the 1920s the Fleet Street frontage and 1 Salisbury Court were replaced by the present Barclays Bank. The existing building has been altered including interwar shopfronts, rebuilding of the roof and wholesale replacement of the interior which have all reduced heritage significance. Particularly at roof level where

there is a mixture of modern roof extensions and alterations to the gables and other decorative features. The rear elevation is historic plain in stock brick and at the lower levels altered and extended. Internally other than structural walls and parts of the roof structure the interior has been entirely modernized and is devoid of significance. There are remnants of the structure in relation to the original floor levels in part and the retained iron columns in Nos 4-7 which are currently encase.

261. The significance of the listed building is derived from its historic, architectural, evidential and artistic values. This significance has been diminished by the previous insensitive alterations and extensions as well as lost features including parts of the Dutch gables and hoists. The building has group value with other listed buildings including Reuters Building and positively contributes to the character and appearance of the Fleet Street Conservation Area.

### Proposals

262. The listed building consent application and planning permission propose to repurpose 2-7 Salisbury Court as a public house following the demolition of adjacent buildings. The listed buildings would then receive a new Queen Anne style elevation to Salisbury Square. Its original roof and fenestration would be restored and its interior rebuilt.
263. The historic elements of the listed building to the eastern elevation would be restored or reinstated in an authentic manner including gables and dormer, two original loading bays and shopfronts with historically accurate fenestration all detailing is evidence based on archive information. The building would have a new south elevation to Salisbury Square designed in a matching Queen Anne style in brick with central large chimney feature. The proposed Queen Anne elevation would be meticulously detailed taking inspiration from Alexander Peebles original design and from comparable buildings. A pub frontage at ground floor would be created on the southernmost frontage as well as the western elevation. The rear elevation would largely be retained and enhanced through the removal of later accretions.
264. Internally the building would be fitted out as a traditional tavern lanterns and shopfronts. Plant would be concealed within the roof space and this would be the subject of further detail to be approved pursuant to a condition.

### Impact

265. Internally the floors would all be removed and replaced with new floors at the historic levels these have been partially replaced in the past. This is required to enable structural stability as this cannot be guaranteed following the removal of adjoining buildings. Further demolitions include the removal of historic party walls and to create a workable layout. Both the floors and the party walls would be



subsequently reinstated in the historic locations. The western section of 2-3 which is the northernmost element of the building would be removed to accommodate the south-eastern corner of the Court Building footprint although the front portion of the building would be retained.

266. The proposals particularly the eastern elevation reinstatement and restoration would be positive and beneficial to the overall significance of the listed building. The new Queen Anne elevation to an enlarged Salisbury Square would be an exceptional and inspirational remodelling based on authentic period details. This new elevation would be compatible with the historic core and fabric. The alterations to the rear would enhance the listed building as experienced from the new north passage and would form an attractive background with St Brides rising above.
267. The extent of demolition is considerable although largely confined to areas of lower significance. The north west corner however is of medium significance including the rear elevation of 2-3 and windows at 4-5 and the remnants of the floor and roof structure. This would all result in the loss of a significant portion of historic fabric however these are areas deemed to be of lower significance. The demolition would cause a moderate degree of harm at the lower end of the spectrum.
268. The existing setting is defined by the buildings on either side of 2-7 Salisbury Court which contribute to significance by giving historic context which reflects a fine urban grain and the evolution of the townscape. Neighbouring 80-81 Fleet Street a 1920s neo-Baroque former back building in Portland Stone to the north contrasts in terms of height, massing and architecture but serves to successfully transition scale from Fleet Street to 2-7 Salisbury Court from main commercial street to characterful narrower side road. No 8 Salisbury Square a narrow five storey former warehouse dating late 19th- early 20th century to south continues the scale of the listed building and fine urban grain with its narrow plot. No 1 Salisbury Square is also part of this setting and a Queen Anne/early Georgian domestic house and successfully bookends the terrace and wider setting. To the west of the site is Reuters Buildings 82-85 Fleet Street. This existing setting enhances the overall richness of the architectural grouping and reinforces the significance of the listed building which derives its significance from artistic, historic, architectural and evidential values.
269. The demolition of 80-81 Fleet Street, 8 Salisbury Court and 1 Salisbury Square would remove other historic buildings of a similar urban grain. These demolitions of non-designated heritage assets would dilute the characterful setting of the listed building. The proposed development would significantly change this setting. The Court Building and the listed building would have a less successful transition due to the massing and height. Despite the stepping down of the massing interface between the two buildings and juxtaposition building typologies would be abrupt and there would be no historic contextual relationship between the two buildings. The Court would encroach on

the envelope of the listed building resulting in the demolition of historic fabric.

270. The development proposals would also present benefits for the listed building in terms of the representation and better revealing of significance through the creation of an applied southern elevation of distinction and quality. The listed building as part of the development would gain prominence and the new use and remodelling would sustain the values of the designated heritage asset.

### **Waithman Memorial, Salisbury Square: (Grade II Listed)**

271. The proposals would have a direct impact as a result of physical alteration of the asset and the proposed new build and surrounding would affect its setting. Direct impacts are subject to a separate application for listed building consent which are also for determination (ref: application reference 20/00996/LBC).
272. The proposal would result in a direct and indirect impact on the listed structure. The memorial is a slender obelisk of grey granite with a square plinth, dated 1833, by James Elmes, commemorating Robert Waithman, Lord Mayor. It is listed Grade II. The inscription on the plinth states 'Erected to the memory of Robert Waithman by his friends and fellow citizens. MDCCCXXXIII.' It originally stood at Ludgate Circus, at the south end of Farringdon Street, was moved to Bartholomew Close in 1951 and moved to its present position in 1975.[EB1] It is of high historical (associative) and medium architectural and artistic significance as a result of its association with a notable City figure in an area historically associated with him, and close to the original location of the obelisk. Waithman was the Ward member for Farringdon Without, had a shop in New Bridge Street and is buried in St Brides' Church.
273. The proposal to move the memorial to the east and south would be acceptable as it has been moved before and its significance as a focus in Salisbury Square would be maintained. In addition, it would become a focal point in views from Fleet Street, Dorset Rise and the new east-west passage on the south west side of the square. The relocation would enhance the architectural and historic significance of the memorial and would reinforce the historic form of Salisbury Square. The proposed seating would provide an opportunity to dwell and to appreciate the memorial.
274. The proposal, subject to detail reserved for conditional, would preserve and enhance the special architectural and historic interest and heritage significance of the Waithman Memorial, including the contribution made by its setting.

### **The Harrow Public House Whitefriars Street (Grade II Listed)**

275. The proposal would result in a direct and indirect impact on the listed building. It is a modest early 18th century building comprising 3 storeys

plus mansard reflecting the historic character of the area. The listed building immediately adjoins the site. The building's significance is derived from its architectural and historic values. The historic setting of the Harrow Pub is fragmented due to Fleetbank House which adjoins to the north and no element of setting makes a contribution to the significance of the pub. The current setting, in particular the form, disposition and scale of surrounding modern built development, detracts from an appreciation of significance. The Harrow Pub would be significantly enhanced through the demolition Fleetbank House. In comparison the Commercial Building has a high-quality crafted approach to architecture which includes faience materiality and decorative detail. The massing, building line, form, material palette and the transition in scale and interface would all be compatible with the Harrow Public House, enhancing its setting and an appreciation of significance.

276. Both the Commercial Building and the Police Buildings would mend the existing fractured streetscape of Whitefriars which forms the setting to Harrow Pub by reintroducing an appropriate building line which follows the historic street pattern. In addition, activation would be introduced by a new public route between Whitefriars Street and Primrose Hill increasing permeability and providing possibilities of a rear informal tables and chairs/outdoor drinking area to the rear of the Harrow Public House which is double aspect. The more active uses of development at ground floor and human scale would animate the streetscape and complement the Harrow Public House increasing footfall which would support the continued success as an establishment. The new public route provides opportunities for additional heritage interpretation on the new party wall enlivening the route and better revealing heritage significance and this would be included within the Cultural Plan to be secured by condition.
277. Overall, the special architectural and historic interest and heritage significance of the Harrow Pub, and the contribution made by its setting, would be preserved and enhanced.

### **Relocation of Non-Designated Heritage Assets**

#### **TP O'Connor bust**

278. There is a bust and accompanying plaque to the journalist and politician T. P. O'Connor on Chronicle House, 72-78 Fleet Street which are non-designated heritage assets. The significance of the location is the relationship between T P O'Connor and the newspaper industry of Fleet Street, not Chronicle House itself. It is proposed to remove the bust and plaque and to erect them on the Salisbury Court elevation of 2-7 Salisbury Court on the pier below the existing City of London Blue Plaque. There is a separate listed building application to move the bust and plaque to 2-7 Salisbury Court which is a Grade II listed building. This proposal would be acceptable as it would maintain the association of T P O'Connor with the newspaper industry of Fleet Street. A condition is recommended to cover their careful removal, secure

storage and re-instatement on 2-7 Salisbury Court.

### **City of London Blue Plaques and commemorative plaques**

279. There are two City of London Blue Plaques on 80-81 Fleet Street and Chronicle House 72-78 Fleet Street, commemorating the Fleet Street conduit which stood in Fleet Street from 1388-1666 and the site of Bradbury & Evans printers and publishers, 1847-1900. The two plaques would be removed and erected in the same locations on the Fleet Street elevation of the proposed Court Building. The plaques are non-designated heritage assets and important elements of the townscape which add historic and cultural interest.
280. There is a City of London Blue Plaque on 2-7 Salisbury Court. It marks the editing of the first edition of the 'Sunday Times' at 4 Salisbury Court in 1822. The plaque would not be affected by the proposed scheme but would need to be protected during the course of development.
281. It is proposed to place two new commemorative plaques on 2-7 Salisbury Court.
282. The proposals to move the Blue Plaques and introduce new commemorative plaques would be acceptable, subject to conditions. Conditions are recommended to cover the careful removal, secure storage and re-instatement of the Blue Plaques, the protection of the Blue Plaque on 2-7 Salisbury Court and the location, materials and details of proposed new commemorative plaques on 2-7 Salisbury Court.

### **Fleet Street Conservation Area**

#### **Character and Appearance and Significance of Fleet Street Conservation Area**

283. The character and appearance and heritage significance of Fleet Street Conservation Area is summarised in detail in the Character Summary and Management Strategy SPD (2016), which is a material consideration of the application. Fleet Street CA is a large and highly significant conservation area with medieval origins as a suburb of the walled City. It is part of the Processional Route between the City and Westminster and combines ceremonial grandeur and commercial bustle. It is noted for its inns and subsequently its association with the legal profession, publishing and printing. Its urban morphology was replaced after the Great Fire and it has an exceptional richness and variety in architectural styles and building ages including narrow Victorian eclecticism, understated Georgian frontages, domestic commercial architecture and monumental 20th century newspaper buildings. The Conservation Area is complex and reflects multiple and intriguing layers of history with a variable urban grain, diverse building types a sinuous spinal route of Fleet Street with arteries of alleys and backstreets and this makes it unique, memorable and of the highest quality. The fine grain of medieval pattern of streets and alleys is

clearly legible embedded amongst larger buildings of the 20th century. The significance of the designated heritage asset is of the highest given and it contains a high concentration of non-designated heritage assets and designated heritage assets.

#### Contribution of the non-designated heritage to Fleet Street Conservation Area

284. The non-designated heritage asset buildings and routes previously identified contribute strongly to the significance of this part of the Fleet Street CA due to their historic architecture and varied character, their associations with the development of the CA during the 19th and 20th centuries and this is summarised below.
285. 72-78 Fleet Street (Chronicle House) is a 1920s office development with decorative pilasters and large areas of glazing. The front elevation makes a moderate contribution to the Fleet Street Conservation Area in terms of its scale, quality, intactness and associations with newspaper industry, the rear elevation is plainer in glazed brick and makes a more neutral contribution.
286. 80-81 Fleet Street is an interwar Bank in the Beaux Arts style, constructed in Portland stone in a prominent corner location. The building was constructed post road widening in 1914 when part of 2-7 Salisbury Court was demolished. The building in terms of scale, commercial associations, location, material quality and richness of architecture makes a high positive contribution to the Fleet Street Conservation Area. The rear elevation makes a neutral contribution.
287. 8 Salisbury Court is a quirky narrow warehouse of the later 19th/20th century occupying a presenting a much older post-Fire plot. The building in terms of scale, grain, commercial associations, materials and architectural detail makes a moderate positive contribution to the Fleet Street Conservation Area. The rear elevation makes a neutral contribution
288. 35 Whitefriars Court (Hack and Hop PH) retains its original 1897 elevation Queen Anne style. The building in terms of scale, value as an historic tavern, materials and architectural detail makes a moderate positive contribution to the Fleet Street Conservation Area. The rear elevation makes a neutral contribution
289. 36-38 Whitefriars dating from 1906 is a commercial building which has been altered and its contribution to Fleet Street Conservation Area derives from its scale and relationship to the neighbouring 35 Whitefriars Street and as a pair this make a collective contribution to the typical urban grain of the side streets. The contribution is low. The rear elevation makes a neutral contribution
290. 1 Salisbury Square is a 1960s neo Georgian corner building which reflects the former buildings which enclosed Salisbury Square during the 18th century. The building in terms of scale, enclosure to Salisbury Square and overall urban grain and building typology and materials makes a moderate positive contribution to the Fleet Street

Conservation Area. The rear elevation makes a neutral contribution

291. Hood Court, Hanging Sword Alley and Primrose Hill make a positive contribution which reflect a much altered and maligned arrangement of alleys and routes characteristic of the historic medieval layout which, with their names characterise the subsidiary alleys of the Conservation Area. As public routes they are of poor quality and not accessible for all. The positive contribution is low.

**Impact:**

292. The proposal would add a diverse mix of building typology and uses, legal, civic and commercial, in the spirit and tradition of the Conservation Area, enriching its' core identity on a London-wide and national level as a historic centre of legal excellence and clustering of institution of national significance. The disposition and hierarchy of buildings is appropriate. The appropriately monumental new court would be of a commensurate scale and would symbolically address the principal artery of Fleet Street, a grand and ceremonial national spine and processional route of Royal and State significance. The Police Station would be located off Fleet Street, but with an appropriate civic presence anchoring Salisbury Square, which would be enlarged in a manner appropriate and commensurate with its scale and function. Otherwise the retention and transformation of 2-7 Salisbury Court in a scholarly and complementary Queen-Anne revivalist manner which would assist in transitioning the scale between Fleet Street and Salisbury Court, whilst the massing and articulation of the Commercial Building would be in scale with the secondary thoroughfares and reinforce a human scale.
293. The urban grain and structure proposed is consistent with other grand projects and major commercial/civic interventions in contrast to the finer grain historic structure of the CA. It would create a generous Salisbury Square consistent with formal/semi-formal open spaces in the Conservation Area and its hinterland which were themselves grafted onto an informal network of courts and alleys. It would deliver new, better and more useable east-west secondary and tertiary routes and spaces whose intimacy, human-scale and informality would accentuate that essential character of the CA, better keying into it on its immediate periphery. It would open up new vistas semi-formal axial vistas of landmark elements, in particular reinforcing the presence of St Bride's sublime steeple, but also of the Waithman Memorial. It should in essence result a compatible urban grain and structure which would embrace that distinctive pattern of informal and formal townscape, of grandeur and intimacy and of high quality and distinctive spatial contrast.
294. In response to representation regarding the change in size of Salisbury Square as a result of proposed development, it is considered that the proposals would be consistent with the urban morphology of Fleet Street, with grander urban gestures, such as Ludgate Circus, granted onto informal finer urban grain.

295. On the whole, the architectural dressing of the various buildings would contribute to that exceptional richness in a variety of styles and ages, from the domestic to the monumental, identified in the SPD.
296. The Court Building is the part of the development which would be most disruptive in building scale, height and resulting mass. The architectural expression as a single frontage, whilst appropriate to the function and use, would result in the loss of a finer urban grain representative of older plot widths, in particular on Salisbury Court. The design detail and handset Limestone have an important role in mitigating this impact and seek to embed the building to context however the resulting building form and composition, whilst monumental, would be assertive and at times uncomfortable in scale with the surrounding finer urban grain.
297. The functions and uses of the Court Building would also affect the character and appearance at the core of the Conservation Area. There would be a loss of active frontages which reflect the bustling business and commercial nature of Fleet Street. Fundamentally there would be a loss of layers of history from medieval to 20th century and the organic network of back streets and the varied frontage of a human scale would be replaced with an ordered, civic and grand insertion. The proposed building would be in Portland stone which would be commensurate with neighbouring significant buildings including Reuter's and Peterborough Court and the ground floor, cornice line and set back upper floors would be in keeping with the scale of these buildings. The modelling of the ground floor and upper storeys would provide a degree of richness and detailing in the tradition of this part of Fleet Street.
298. The Police Building has a lesser impact on the setting of the Fleet Street CA as it is set back from Fleet Street. It would have an impact on Whitefriars Street and Salisbury Square and would not be visually experienced from Fleet Street. The overall massing and bulk of the upper floors would be visible above established roof lines in long views outside of the Conservation Area. The Holm Oak greening and ceramic materials of the upper floors are welcomed, and over time would soften any visual prominence. The overall building concept and materials are all well considered and whilst the architecture materiality are not part of prevailing townscape these are compatible to the setting of the Fleet Street Conservation Area.
299. The Commercial Building is fully outside of the Fleet Street Conservation Areas and its impacts are confined to the designated heritage assets setting. There would be no adverse visual impact on Fleet Street. The overall building concept, ground floor active uses, attention to detail and materials are also well considered and would be compatible with the setting of Fleet Street Conservation Area.

#### Conclusion of impacts

300. In general, the scheme would be of a scale, structure, urban grain, disposition, form and appearance consistent with and better keying into the character and appearance and setting of the Fleet Street

Conservation Area. However, it would result in the loss of a significant amount of historic fabric, structure and appearance thorough the demolition of non-designated heritage assets.

301. This part of Fleet Street is evocative of the entire Fleet Street CA character and in terms of heritage significance has a high value. The principle harm would be due to the demolition of those buildings and routes which make a positive contribution to the character of the area. The replacement buildings would be much larger and would to a degree alter the prevailing scale and tight urban grain. The Court Building would be high quality, functional, rational and would introduce a new architectural drama to the Conservation Area but its monumental scale would be somewhat assertive. However, given the civic nature of the Court Building, it would be reasonable to expect this to be expressed with a degree of confident civic grandeur. Whilst only a part of the Conservation Area would be affected the impact would be all the more significant due to the high heritage value of this part of Fleet Street Conservation Area. This quarter is representative of the character of the Fleet Street Conservation Area and therefore, given the scale historic fabric and grain lost, the harm would be of significance to the character and appearance of the Conservation Area as a whole would be at the upper level of less than substantial harm.
302. Notwithstanding the harm identified, it is important to note that Fleet Street has continuously evolved over time with a rich diversity of architecture tracing the centuries. In particular, a number of the finer grain plot width frontages were replaced with later larger scale, civic and commercial buildings, many now listed. Examples include the Daily Express Building and Peterborough Court, the Daily Telegraph Building, Reuter's and, to the west of Fleet Street, the Royal Courts of Justice. Therefore, there are clear historical precedents for the incorporation of large scale civic buildings within Fleet Street.

### **Indirect impacts on the setting of Designated Heritage Assets**

#### **St Paul's Cathedral (Grade I)**

303. St Paul's Cathedral is the seminal masterpiece of renowned architect Sir Christopher Wren, with contributions over time from other notable designers and craftspeople of national stature, including Hawksmoor and Bird. It represents the high point of the distinctive national English Baroque style and is symbolic of the renaissance of London as a major European capital of culture and commerce post-restoration and resurgence post-Fire. The earliest site of Christian worship in London, the seat of the Bishop of London and home of the Diocese of London, it is one of the most important places of Christian worship in the national and international Anglican Church. It is one of London's and the Nation's most famous landmarks, having borne witness to major historical and cultural events in the national story. It is the final resting place of esteemed figures of State, whether of political, military or artistic renown. It is of outstanding national and even international architectural, historic, artistic, archaeological, evidential and communal



(social, commemorative, spiritual and symbolic) heritage significance.

304. Sited strategically atop high ground cresting Ludgate Hill, it was designed to define the City topographically and was for a millennia the tallest building in London. Its towering silhouette has throughout history sought to define London and the Nation, instilling commemoration and pride during national occasions. It is and has been a ceremonial centre and backdrop of Royal and State ritual and pomp at the heart of national conversation, ranging from the state funeral of Nelson and Wellington, to Churchill and Thatcher, amongst many others. As such, setting makes a significant contribution to those architectural, historic and communal values, in particular. Those main elements of setting contributing to significance are i.) strategic civic riparian views and river prospects from the banks of the Thames and it's Bridges ii.) localized townscape views and iii.) the processional route to the west front on approach from Fleet Street and Ludgate Hill.
305. In terms of the impact on the Processional Route, the architecture lining the Fleet Street section of the route is eclectic and diverse with varied floor plates, sizes and architectural styles and includes landmark buildings such as the churches of St Dunstan, St Brides and St Martin Ludgate, banks such as Hoare's and offices such as the Daily Telegraph and Daily Express.
306. The views of St Paul's change along the length Fleet Street depending on the topography and alignment of buildings. Views unfold as the observer walks eastwards along the northern side of Fleet Street. The experience is dynamic, rather than static and the buildings on the southern side unfurl to gradually reveal St Paul's Cathedral. The viewing experience has been subject to long-term curation as a kinetic townscape sequence and experience.
307. The views begin on the north side of Fleet Street at the junction with Fetter Lane in a series of visual sequences. From Fetter Lane the south side of the street, larger historic buildings frame the view including the Reuters Building (grade II), behind which the spire of St Brides can just be glimpsed. The existing buildings on the site have a relatively consistent building scale and relate well to the overall scale of Fleet Street and these lead the eye to the Cathedral. Opposite, on the north side, are the prominent former offices of the Daily Telegraph and Daily Express. The Cathedral appears in the view: the lantern, a sliver of dome, peristyle and the north-west tower are all visible. There is a pleasing juxtaposition of the spire of St Martin Ludgate, the north-west tower and the dome, arranged in a rising progression.
308. The proposed height and massing of the Court Building would be prominent, an assertive presence to the right of the dome. At the eastern corner of the junction with Fetter Lane there would be an impact on the sequential view and the changed setting would result in a momentary partial concealment of the lantern, dome and peristyle which would slightly distract from the Cathedral pre-eminence. It is acknowledged that this is not a pristine view and that it is momentary and therefore the level of harm reduced. In addition, an informal partial

view of the upper most part of St Brides spire would be concealed within the viewing sequence at St Dunstan's Court this is assessed in section on St Bride's setting below.

309. In moving further eastwards the sequential views from the Cheshire Cheese Public House and beyond there would be no impact on the Cathedral and further along the Processional Route towards Ludgate Circus the site would be behind the viewer.
310. The demolition of Chronicle House and Barclays Bank would not, in principle, harm the contribution of the Processional Route to the significance of St Pauls Cathedral.
311. The Court Building massing, monumental symmetrical architecture and high-quality materials including hand set limestone would befit the civic status and function of the building and would be addition worthy to the Processional Route. The Court Building would introduce a new layer of history and landmark to the Processional Route reinforcing the sense of a 'national spine', lined with gravitas institutions of state, on approach to the Cathedral.
312. Overall St Pauls would remain the focus and pre-eminent landmark and the contribution the Processional Route makes to the significance of St Paul's would be unharmed, with only a slight diminishment. of significance due to the identified momentary and very slight concealment of St Pauls Cathedral which is contrary to policy CS13 and draft policy S13. Given minor level of impact identified to an element of harm identified to an element of setting making a significant contribution to significance, it is considered the harm overall to St Paul's would be at the very lower end of less than substantial spectrum.
313. The other setting impact is on those strategic City-wide riparian views from the banks of the Thames and its bridges. At no point would the pristine, sky-etched silhouette of the Cathedral be obscured or shadowed by the proposal, which would be sited some distance from it in these broad panoramas, and where it would accord with the prevailing heights and datums so as to not dilute the varying pre-eminence of the Cathedral's skyline presence. Thus, this significant contribution of setting to significance would be preserved.
314. St Pauls Cathedral is an iconic building of international importance and its historic, architectural and evidential values are of the uppermost significance and therefore great weight must be attached to this significance in evaluating any impacts. The impact in this case is transient as the development momentarily obscures part of the dome and lantern on approach around the Fetter Lane and Fleet Street junction. This impact is considered harmful and the special architectural and historic interest and heritage significance of St Paul's Cathedral would not be preserved. Attaching great weight to the iconic heritage status and values of significance the impact is evaluated as less than substantial. Due to the momentary nature of the harm and the quality of the baseline view of the listed building which is not pristine

the level of less than substantial harm is considered to be low.

### St Bride's Church (Grade I)

315. St Bride's Church (1701-3) in Portland stone has one of Wren's tallest spires comprising five octagonal stages of diminishing height. The spire is one of the most distinctive and memorable on the city's skyline appreciated from within and outside of Fleet Street Conservation Area. The skyline presence when viewed from the bridges and banks of the Thames make, in particular where the spire can be seen as part of the romantic historic skyline around the Temples to Blackfriars and in association with St Paul's, a significant contribution to significance. Those varied and more incidental local views from Fleet Street and Ludgate Hill are also significant, albeit less so. Those further afield riparian views of the spire from the east are also significant, albeit less so again.
316. There would be a change to the setting of St Bride's Church in the baseline kinetic viewing experiences from Waterloo Bridge, Hungerford Bridge and from the Southbank, London Bridge and Southwark Bridge. From all these locations St Bride's spire is a legible landmark within a complex urban layering with taller background buildings and lower foreground buildings. The proposed development would form a further urban layer and in some kinetic views from Waterloo Bridge, Hungerford Bridge and from the Southbank the lowest tier of St Bride's Church spire would be partially concealed and the setting around the spire further built up and the ability to appreciate the totality of the spire would be diminished. In views from London Bridge and Southwark Bridge there would be an increased massing and bulk around the base and behind the spire silhouette
317. The immediate setting of St Bride's would remain unchanged and the development on the site which is its wider context setting would impact on localised views only of the spire.
318. There would be a loss of visibility of the uppermost section of the spire from a short stretch of Fleet Street near St Dunstan's Court. This is a momentary and transient view along Fleet Street and the existing silhouette is truncated by foreground buildings. St Bride's spire terminates the view westwards from Pilgrim Hill looking from within St Paul's Cathedral Conservation Area across to Fleet Street Conservation Area. This is an identified view in St Paul's Cathedral CA and there would be no significant impact to setting or significance in this identified view.
319. From Old Bailey/Ludgate Hill to Ludgate Circus westward St Bride's spire is a prominent landmark rising above Procession House in the foreground with Reuters Building 85 Fleet Street (grade II) in the background. The existing setting includes buildings which are subordinate in scale with uncluttered roof lines around the spire, the gentle curve of Fleet Street and St Dunstan's in the west in the distance. In kinetic views west the Court Building would be visible

rising above the local building height and the north west corner of the Police Building would be prominent to the right of and behind St Bride's spire but would be subordinate to it. There would be an overall increase of massing, bulk and visual clutter to the. The Fleet Street Conservation Area SPD identifies the view from the North East quadrant of Ludgate Circus towards St Bride's Church as a key view. There would be no impact on St Brides in this key view and only the Court Building would be visible which would integrate into the townscape context. There would be no harm to this identified key view.

320. A enhancement to the setting and prominence of St Bride's Church is the creation of a high-quality public view along the new north passage within the site. The view is enclosed and the spire would form a striking and attractive backdrop which terminate the view and better reveals the significance of designated heritage.
321. Overall, the development would result in changed setting of St Bride's Church. This would slightly diminish its landmark presence in views from those identified Thames Bridges in baseline views , Ludgate Hill and from Fleet Street as part of the Processional Route. There would be a degree of harm to setting and significance and this is evaluated at less than substantial, at the lower end of the spectrum.

#### The Punch Tavern and offices over 98-100 Fleet Street (Grade II Listed)

322. This is a public house with offices over which was rebuilt in two phases. The Fleet Street elevation dates from 1894 and the Bride Lane elevation dates from 1896-7. The building's significance is derived from its historic, architectural and evidential values which draw from its physical fabric as a good example of a 'Gin Palace', with an exceptional decorative faience décor and bar. The setting is defined by the diverse complementary scale of eclectic historic architecture of this eastern end of Fleet Street and Ludgate Circus and by the adjoining Bride Lane and the diminutive scale of the Old Bell (grade II) to the north as well as St Bride's Church and this makes a modest contribution to significance overall.
323. The Court Building would be in the view but some distance from the designated heritage asset and in this oblique view would be a compatible new addition to the wider setting as part of the townscape of Fleet Street. In longer views from Ludgate Hill the upper storeys of the Police Building would be visible as part of the wider setting of the listed building. The Police Building would read as more distant background architecture unrelated to the Fleet Street context. There would be no harm to the significance or setting of the listed building.
324. Overall the proposal would preserve the special architectural and historic interest and heritage significance of 98-100 Fleet Street, including the contribution made by setting.

#### The Old Bell Public House 96 Fleet Street (grade II)

325. The Old Bell is three storeys fronting Fleet Street has a much restored late 17th Century rear (reputably built by Wren for his masons working on St Bride's) with M profile roof that was refaced in the 18th Century (including face to St Bride's Avenue), altered in the 19th and 20th Centuries, with a late Victorian bar and Edwardian kiosk (which is the two storey element to Fleet Street) which incorporated a historic alley and courtyard which provided the arrival experience at the original pub. The buildings significance is derived from its, historic, architectural and evidential values. The existing setting of the Old Bell Public House is defined by the wider diverse scale and eclectic architecture of this eastern section of Fleet Street and Ludgate Circus including the prominent party wall of Bartholomew House. The varied setting of historic buildings in complementary styles and rooflines and building heights make a significant contribution to significance.

#### Bartholomew House 90-94 Fleet Street (Grade II Listed)

326. Bartholomew House is a prominent five storey plus double mansard roof building which mixes Tudor and Classical motifs in red brick and stone and has a prominent central gable and triangular dormers. The red brick flank elevation is very prominent feature in the townscape and particularly from Ludgate Circus. The buildings significance is derived from its historic, architectural and evidential values. Bartholomew House has a similar setting as the Old Bell Public House and is defined by the wider diverse scale and eclectic architecture of this eastern section of Fleet Street and Ludgate Circus. The varied setting of historic buildings in complementary styles and rooflines and building heights make a significant contribution to significance
327. The Court Building would become part of the setting but some distance from the designated heritage asset and in this oblique view would be a compatible addition to the wider setting as part of the townscape of Fleet Street. In longer views from Ludgate Hill the upper storeys of the Police Building would be visible as part of the wider setting of the listed building. The Police Building would read as more distant background architecture unrelated to the Fleet Street context. There would be no harm to the setting or significance of the listed buildings.
328. Overall the proposal would preserve the special architectural and historic interest and heritage significance of Bartholomew House including the contribution made by setting.

#### Reuters and Press Association Headquarters and 9 Salisbury Court (Grade II Listed)

329. Designed by Edwin Lutyens this nine storey Portland stone faced building sits on a prominent corner location immediately to the east of the development site. Its setting is defined by the diverse commercial streetscape of Salisbury Court, Fleet Street, 2-7 Salisbury Court, Nos 72-78 and 80-81 Fleet Street. The 1935 Headquarters has a simplified symmetrical classical style rusticated 2 storey base. The building has a

monumental scale and presence on Fleet Street with a chamfered corner to the Salisbury Court junction. The building has a long plain return to the east screening and enclosing St Brides Church. The west return to Salisbury Court is also plain but incorporates a pedestrian route with an axis on St Bride's Church. The significance of the building is derived from its cultural, artistic, historic, architectural and evidential values. The setting of the listed building is defined by the proximity to St Bride's Church and the contrast between more monumental historic newspaper and commercial buildings on Fleet Street as well as the finer Salisbury Square as an important public space. This varied setting of historic buildings in complementary styles and rooflines and building heights make a significant contribution to significance

330. Nos 72-78 and 80-81 Fleet Street which would be demolished as part of the redevelopment for the Court Building also contribute to the existing setting and significance of the buildings as part of the wider history of Fleet Street as former newspaper and commercial buildings which characterise Fleet Street. The demolition of these buildings would cause a degree of harm to the setting of the Reuters building diluting the existing rich historic setting.
331. The Court Building is clearly inspired by the Reuters Building and would be entirely compatible and a worthy companion to the listed building in terms of composition, classical design and materiality and would contribute positively to its contextual form, quality and character. It would be a compatible addition to the designated heritage assets setting. The Reuters Building would remain a legible and prominent landmark which would still draw on the historic character of Fleet Street and its association with the press and the new development would not dilute its architectural relationship with St Bride's, thus preserving its significance and setting.
332. Overall the proposal would preserve the special architectural and historic interest and heritage significance of the Reuters and Press Association Headquarters, including the contribution made by setting, and there would be some benefits to setting through enhancements to the public realm.

#### Fleet Street Former Glasgow Herald Office (Grade II Listed)

333. This is an eye-catching former newspaper building (1927) mingling Greek revival and Moderne on the south side of Fleet Street. The listed building is prominent at 7 storeys within the urban townscape setting breaking through and rising above adjoining 5 storey buildings. The significance of the building is derived from its artistic, historic, architectural and evidential values.
334. The existing setting of the listed building is defined by the varied historic commercial buildings with relatively narrow plot widths in complementary styles and rooflines and building heights and these characteristics make a significant contribution to significance. The

proposed Court Building would be within the wider setting of the listed building located to the east of the designated heritage asset. The proposed height, footprint and massing of the Court Building development would result in a clear change to setting but it would not dominate or harm the setting or significance of the designated heritage asset.

335. Overall the proposal would preserve the special architectural and historic interest and heritage significance of 56-57 Fleet Street including the contribution made by setting.

#### Tipperary Public House, 66 Fleet Street (Grade II Listed)

336. A public house dating from 1667 and much altered with a stuccoed elevation comprising 4 storeys plus attic with a modern pub frontage. This is a mid-terrace hemmed in building on the southern side of Fleet Street. The significance of the building is derived from its historic, architectural and evidential values. The varied setting of historic buildings of different building periods in complementary styles and rooflines and building heights make a significant contribution to significance. 65 Fleet Street a 1980s post-modernist building adjoins the designated heritage but does not positively to significance. 69-71 Fleet Street is also part of the setting, this is a neutral building and demolition and redevelopment presents an opportunity to enhance the setting
337. The Court Building would be within the setting of the public house and would result in a clear change to setting but it would not dominate or harm the setting or significance of the designated heritage asset. The designated heritage asset has a robust 4 storey scale and is set within an already diverse context and setting.
338. Overall the proposal would preserve the special architectural and historic interest and heritage significance of 66 Fleet Street including the contribution made by setting.

#### Northcliffe House Tudor Street

339. Northcliffe House is a substantial and striking former printing office dated 1925-26 and comprises four storeys plus attic, clad in stone on a steel frame. Decorative elements include the polygonal corner tower and the fluted cornice. It is prominently located on the western corner of Whitefriars Street and Tudor Street. The gridded street arrangements and diverse architectural styles and materiality of largely commercial buildings of the 20th century make a positive contribution to significance. The Harrow Public House is part of this varied and positive context. Fleetbank House is part of the setting but does not make a positive contribution and redevelopment is an opportunity for enhancement
340. The Commercial Building would step down from the Police Building responding to the topography on Whitefriars Street and would form part

of the listed building wider setting particularly in views northwards along Carmelite Street. The decorative terracotta faience to the Commercial Building and the greenery of the upper storeys of the Police Building would contribute a new richness and layering to the setting in oblique views northwards. The proposed scale of the development, building line, materiality would be compatible with the wider setting. Fleetbank House is part of the setting but does not make a positive contribution and redevelopment is an opportunity for enhancement

341. Overall the proposal would preserve the special architectural and historic interest and heritage significance of Northcliffe House including the contribution made by its setting.

#### 24 Tudor Street (Grade II Listed)

342. Located on the eastern corner of Whitecross Street and Tudor Street is 24 Tudor Street an early 19th century comprising 4 storeys plus mansard stuccoed finish, sash windows, defined hierarchy and 20th century shopfront. The rear elevation is modest in brick and fronts Primrose Hill. The two buildings strongly define the gateway to Whitefriars Street which rises to Fleet Street. The significance of the buildings is derived from their historic, architectural and evidential values.
343. The Commercial Building would step down from the Police Building responding to the topography on Whitefriars Street and would form part of the listed building wider setting particularly in views northwards along Carmelite Street. The decorative terracotta faience to the Commercial Building and the greenery of the upper storeys of the Police Building would have a new richness and layering to the setting in oblique views northwards. The proposed scale of the development, building line, materiality would be compatible with the wider setting.
344. The Commercial Building would step down from the Police Building responding to the topography and would form a new backdrop setting for the 4 storey historic building. The decorative terracotta faience to the Commercial Building and the greenery of the upper storeys of the Police Building would contribute a new richness and layering to the setting in long views northwards. The proposed scale of the development and materiality would be compatible with the wider context.
345. Overall the proposal would preserve the special architectural and historic interest and heritage significance 24 Tudor Street including the contribution made by setting

#### 9 Carmelite Street (Grade II Listed)

346. No 9 Carmelite Street occupies a corner location with Embankment and is a commercial building from 1893-4 in a red brick with stone dressing Tudor gothic style. The significance of the buildings is derived from their historic, architectural and evidential values and is part of a



cluster of historic buildings. The building is within Whitefriars Conservation Area and positive characteristics of setting which contribute to significance include diverse historic building, a richness of materials as well as more contemporary commercial buildings. The building with others makes a positive contribution to the setting of Victoria Embankment and St Paul's Cathedral in river prospects.

347. In long linear views from Victoria Embankment northwards the upper storeys of the Police Building and Commercial Building would be visible as part of the wider setting of the listed building. The materiality of the upper storeys of the Police building comprising light coloured ceramic panels and Holm Oak trees would be visible and would step down to the terracotta coloured faience finishes of the Commercial Building. The massing and scale and materiality would sit comfortably within the wider settings of these listed buildings. The development would provide visual interest and would be a significant enhancement compared to the existing Fleetbank House and undefined background architecture.
348. Overall the proposal would preserve the special architectural and historic interest and heritage significance 9 Carmelite Street including the contribution made by setting.

#### Carmelite House, 8 Carmelite Street (Grade II Listed)

349. Carmelite House has elevations to Tudor Street and Tallis Street and is a monumental Tudor style building from late 19th century. The significance of the buildings is derived from their historic, architectural and evidential values and is part of a cluster of historic buildings. The building is within Whitefriars Conservation Area and positive characteristics of setting which contribute to significance include diverse historic building, a richness of materials as well as more contemporary commercial buildings. The building with others makes a positive contribution to the setting of Victoria Embankment and St Paul's Cathedral in river prospects.
350. Impacts to the setting of 8 Carmelite Street would be similar to No 9 Carmelite Street. The massing and scale and materiality would sit comfortably within the wider settings of these listed buildings. The development would provide visual interest and would be a significant enhancement compared to the existing Fleetbank House and undefined background architecture.
351. Overall the proposal would preserve the special architectural and historic interest and heritage significance of 8 Carmelite Street including the contribution made by its setting.

#### Former Guildhall School of Music John Carpenter Street (Grade II Listed)

352. Former Guildhall School of Music which dates from 1885-7 designed by Sir Horace Jones is a three storey ashlar buildings with a classical elevation located on the corner of Tallis Street and Carmelite Street. The significance of the buildings is derived from their historic,

architectural and evidential values and is part of a cluster of historic buildings. The building is within Whitefriars Conservation Area and positive characteristics of setting which contribute to significance include diverse historic building, a richness of materials as well as more contemporary commercial buildings. The building with others makes a positive contribution to the setting of Victoria Embankment and St Paul's Cathedral in river prospects.

353. Overall the proposal would preserve the special architectural and historic interest and heritage significance of the Former Guildhall School of Music including the contribution made by its setting.

#### Sion College (grade II)

354. The upper sections of the proposed buildings would be visible in long views from the Lambeth shore from the South Bank from the Queens Walks /Sea Containers and from Blackfriars Bridge. In the foreground is a high concentration of City listed buildings including Sion College and this is part of a high concentration of low-rise high value historic buildings defines the Victoria Embankment and are of high quality and significance. The significance of Sion College is derived from artistic, historic, architectural and evidential values. The setting is defined by other listed buildings as well as Victoria Embankment itself and Temple Gardens which positively contribute to significance in these long views. Fleetbank House, 8 Salisbury Square, 6 New Street Square and Peterborough Court are visible as a secondary layer of background townscape fabric and these elements detract from the significance.
355. The Police Building and Commercial Building would be visible as part of the wider urban layering as part of the wider setting. Visibility would be limited to the upper storeys of the Police Buildings and Commercial Building. The backdrop of Sion College is already defined by taller recent buildings and the proposed buildings would sit comfortably in this context without rising taller than other developments and would therefore cause no harm to setting or significance in these longer views.
356. Overall the proposal would preserve the special architectural and historic interest and heritage significance of Sion House as experienced from Queens Walks/Sea Containers including the contribution made by setting. The proposal would preserve the setting and significance of Sion College.

#### Telephone House (grade II)

357. The upper sections of the proposed buildings would be visible in long views from the Lambeth shore from the South Bank from the Queens Walks /Sea Containers and from Blackfriars Bridge. In the foreground is a high concentration of City listed buildings including Telephone House. The setting is defined by a concentration of low-rise high value historic buildings, the Victoria Embankment and are of high quality and significance. The significance of the Telephone House is derived from

artistic, historic, architectural and evidential values. The setting is defined by each other as a group as well as Victoria Embankment itself and Temple Gardens which positively contribute to significance in these long views. Fleetbank House, 8 Salisbury Square, 6 New Street Square and Peterborough Court are visible as a secondary layer of background townscape fabric and these elements detract from the significance.

358. The Police Building and Commercial Building would be visible as part of the wider urban layering as part of the wider setting. Visibility would be limited to the upper storeys of the Police Buildings and Commercial Building. The backdrop of Telephone House is already defined by taller recent buildings and the proposed buildings would sit comfortably in this context without rising taller than other developments and would therefore cause no harm to setting or significance in these longer views.
359. Overall the proposal would preserve the special architectural and historic interest and heritage significance of Telephone House, as experienced from Queens Walks/Sea Containers including the contribution made by setting. The proposal would preserve the setting and significance of Telephone House.

#### Hamilton House (grade II)

360. The upper sections of the proposed buildings would be visible in long views from the Lambeth shore from the South Bank from the Queens Walks /Sea Containers and from Blackfriars Bridge. In the foreground is a high concentration of City listed buildings including Hamilton House. This is part of a high concentration of low-rise high value historic buildings defines the Victoria Embankment and are of high quality and significance. The significance of Hamilton House is derived from their artistic, historic, architectural and evidential values. The setting is defined by other listed buildings, Victoria Embankment itself and Temple Gardens which positively contribute to significance in these long views. Fleetbank House, 8 Salisbury Square, 6 New Street Square and Peterborough Court are visible as a secondary layer of background townscape fabric and these elements detract from the significance.
361. The Police Building and Commercial Building would be visible as part of the wider urban layering as part of the wider setting. Visibility would be limited to the upper storeys of the Police Buildings and Commercial Building. The backdrop of Hamilton House is already defined by taller recent buildings and the proposed buildings would sit comfortably in this context without rising taller than other developments and would therefore cause no harm to setting or significance in these longer views.
362. Overall the proposal would preserve the special architectural and historic interest and heritage significance of Hamilton House, as experienced from Queens Walks/Sea Containers including the

contribution made by setting. The proposal would preserve the setting and significance of Hamilton House.

City of London School (Grade II listed)

363. The upper sections of the proposed buildings would be visible in long views from the Lambeth shore from the South Bank from the Queens Walks /Sea Containers and from Blackfriars Bridge. In the foreground is a high concentration of City listed buildings including, City of London School dating from 1881. This concentration of low-rise high value historic buildings defines the Victoria Embankment and are of high quality and significance. The significance of City of London School is derived from artistic, historic, architectural and evidential values. The setting is defined by other listed buildings on Victoria Embankment itself and Temple Gardens which positively contribute to significance in these long views. Fleetbank House, 8 Salisbury Square, 6 New Street Square and Peterborough Court are visible as a secondary layer of background townscape fabric and these elements detract from the significance.
364. The Police Building and Commercial Building would be visible as part of the wider urban layering as part of the wider setting. Visibility would be limited to the upper storeys of the Police Buildings and Commercial Building. The backdrop of City of London House is already defined by taller recent buildings and the proposed buildings would sit comfortably in this context without rising taller than other developments and would therefore cause no harm to setting or significance in these longer views. The proposal would preserve the setting and significance of City of London House.

Unilever House (grade II)

365. The upper sections of the proposed buildings would be visible in long views from the Lambeth shore from the South Bank from the Queens Walks /Sea Containers and from Blackfriars Bridge. In the foreground is a high concentration of City listed buildings including Unilever House. This concentration of low-rise high value historic buildings defines the Victoria Embankment and are of high quality and significance. The significance of the Unilever House 1930-2 s derived from artistic, historic, architectural and evidential values. The setting is defined other listed buildings on Victoria Embankment itself and Temple Gardens which positively contribute to their significance in these long views. Fleetbank House, 8 Salisbury Square, 6 New Street Square and Peterborough Court are visible as a secondary layer of background townscape fabric and these elements detract from the significance.
366. The Police Building and Commercial Building would be visible as part of the wider urban layering as part of the wider setting. Visibility would be limited to the upper storeys of the Police Buildings and Commercial Building. The backdrop of Unilever House is already defined by taller recent buildings and the proposed buildings would sit comfortably in

this context without rising taller than other developments and would therefore cause no harm to setting or significance in these longer views. The proposal would preserve the setting and significance of Unilever House.

The Daily Express Offices 120 -129 Fleet Street (grade II\*):

367. This 1932 iconic art deco building with expressive black Vitrolite glass and rounded corners is a bold architectural statement on the northside of Fleet Street and would be diagonally opposite the Court Building. Significance is derived from, artistic, historic, architectural and evidential values.
368. The setting of the designated heritage asset is defined by larger former newspaper single block buildings set between historic alleys and comprises a rich variety of styles and materials. In the immediate setting is Reuters building to the south, and Ludgate House, Mersey House and the Telegraph Building to the west which all enhance the setting of the Daily Express Offices. 72-78 and 80-81 Fleet Street are part of this wider setting. This diverse context of larger commercial historic buildings on Fleet Street positively contribute to significance.
369. The designated heritage asset is sufficiently robust with a striking architectural identity which is reinforced by other unique and diverse historic designated assets on the northern side of Fleet Street. The demolition of 72-78 and 80-81 Fleet Street would not harm the overall wider setting or significance of the listed building. The scale, detailed design and materiality of the Court Building would complement the existing diverse setting of historic commercial buildings with larger floor plates and rich architectural details and whilst the wider setting would change the development would not detract from the listed buildings significance.
370. Overall the proposal would preserve the special architectural and historic interest and heritage significance of the Daily Express Building including the contribution made by setting.

Mersey House 132-134 Fleet Street (grade II)

371. Dating from 1904-6 this successful Portland stone narrow 5 storey building has a big arched ground floor and is nestled amidst other larger commercial buildings. The significance of the building is derived from their former, historic, architectural and evidential values.
372. The building has a similar setting to the Daily Express offices and is defined by the larger commercial buildings on the north and south sides of Fleet Street. In the immediate setting is Reuters building (grade II) to the south, Daily Express office (grade II\*) and the Telegraph Building (grade II\*) to the west which all enhance the historic and architectural significance of Mersey House reflecting the rich commercial and newspaper history of Fleet Street and forms a unique hub of eclectic architecture. 72-78 and 80-81 Fleet Street are part of this wider setting.

This diverse context of larger commercial historic buildings on Fleet Street positively contribute to significance.

- 373. The Court Building would be directly opposite the designated heritage asset and would change the setting. The designated heritage asset has a robust scale and identity and its expressive architecture is set within a cluster of other historic designated assets on the northern side of Fleet Street which contribute to significance. The demolition of 72-78 and 80-81 Fleet Street would not harm the overall wider setting or significance of the listed building. The scale, detailed design and materiality of the Court Building would complement the existing diverse setting of historic commercial buildings with larger floor plates and rich architectural details and whilst the wider setting would change the development would not detract from the listed buildings significance.
- 374. Overall the proposal would preserve the special architectural and historic interest and heritage significance of Mersey House including the contribution made by setting.

#### The Daily Telegraph Building 135-141 Fleet Street (Grade II Listed)

- 375. The Daily Telegraph Building dates from 1928-31 and is a monumental former newspaper headquarters in Portland stone comprising 6 storeys and a recessed additional storey and includes giant columns and showcases Egyptian ornamentation. The significance of the building is derived from the former artistic historic, architectural and evidential values. This is a robust building with a strong architectural identity and would be a similar height and materiality to the Court Buildings which would be directly opposite.
- 376. The setting of the Daily Telegraph Building is defined by larger commercial buildings is Reuters building, Daily Express office and Mersey House as well as more historic buildings with smaller narrower floor plates. The setting is diverse and reflects the history of Fleet Street which positively contributes to the significance of the Telegraph Building. 72-78 and 80-81 Fleet Street are part of this wider setting. The postmodern 69-71 Fleet Street is also part of the setting a building identified as having neutral value.
- 377. The Court Building would be directly opposite the designated heritage asset and would change the setting. The striking symmetry, grand proportions, fine details and high-quality materials would complement the Daily Telegraph Building and show an attention to detail that is characteristic of the more monumental buildings which positively contribute to setting. The demolition of 72-78 and 80-81 Fleet Street would not harm the overall wider setting or significance of the listed building. The scale, detailed design and materiality of the Court Building would complement the existing diverse setting of historic commercial buildings with larger floor plates and rich architectural details and whilst the wider setting would change the development would not detract from the listed buildings significance.
- 378. Overall the proposal would preserve the special architectural and

historic interest and heritage significance of the Daily Telegraph Building including the contribution made by setting.

143- 144 Fleet Street (Grade II Listed)

379. The building dates from 1905 and is steel frame with vigorous almost ecclesiastical Gothic, with a lone central statue of Mary Queen of Scots. The significance of the building is derived from the artistic historic, architectural and evidential values. The setting of the listed building is architecturally diverse and representative of Fleet Street's rich history including the more historic narrow finer grain buildings to the west and the larger commercial floor plates of the 20th century. This diverse context and richness of building types contributes to the significance of the listed building. The postmodern 69-71 Fleet Street is also part of the setting a building identified as having neutral value.
380. The Court Building would be directly opposite the designated heritage asset and would change the setting. The resulting volume would be monumental and bold but this overall grandeur would befit the civic purpose and status of the Court Buildings. The building is well designed and detailed with appropriate materials which would be of high and durable quality.
381. The designated heritage asset has a robust five storey scale, decorative architecture and is set within a cluster of other historic designated assets on the northern side of Fleet Street which provide a defined local setting which enhances significance. The detailed design of the Court Building would complement this diverse setting the massing would be uncharacteristic but would not detract from the listed building's significance.
382. Overall the proposal would preserve the special architectural and historic interest and heritage significance of the 143-144 Fleet Street including the contribution made by setting.

145 Fleet Street Ye Old Cheshire Cheese Public House (Grade II Listed)

383. A late 17th century, heavily altered modest terraced building intrinsic to the historic core of Fleet Street located on the north side of Fleet Street. The significance of the building is derived from historic, architectural and evidential values. The existing setting is defined by an eclectic mix of building types both the monumental scale of former newspaper buildings including Daily Express office, Mersey House and The Telegraph Building as well as the finer urban grain of 143-144 and 146 Fleet Street which are now retail and commercial buildings and more modern infills. This setting positively contributes to the historic values of the listed building. The postmodern 69-71 Fleet Street is also part of the setting a building identified as having neutral value.
384. The Court Building would be directly opposite the designated heritage asset and would change the setting and enhance the entry to Whitefriars Street. The Court Building would be directly opposite the designated heritage asset and would change the setting. The resulting

volume would be monumental and bold but this overall grandeur would befit the civic purpose and status of the Court Buildings. The building is well designed and detailed with appropriate materials which would be of high and durable quality.

- 385. The designated heritage asset has a robust four storey scale and is set within a cluster of other historic designated assets on the northern side of Fleet Street which enhance significance and setting. The detailed design of the Court Building would complement this diverse setting and the massing would not detract from the listed buildings values.
- 386. Overall the proposal would preserve the special architectural and historic interest and heritage significance of the 145 Fleet Street including the contribution made by setting

#### 146 Fleet Street (Grade II Listed)

- 387. No 146 dating from late 17th century has a painted brick elevation to Fleet Street/. The rear elevation is simple brick elevation with sash windows and segmental arches of the late 17th century rear elevation and includes a passageway at ground leading from Fleet Street to Wine Office Court. The significance of these buildings is derived from their historic, architectural and evidential values. The overall experience and setting is intimate and enclosed within the setting which enhances the significance of these designated heritage assets. The postmodern Nos 68-71 Fleet Street is in the background of the setting rising above the foreground Nos 146 Fleet Street. This is clearly detached from this intimate back street experience. This is an identified view within the Fleet Street Conservation Area. 1-3 Wine Office Court (grade II) is a row of modest early C19th terrace properties within the identified view and is also part of the setting of 146 Fleet Street as experienced within Wine Court.
- 388. The proposed Court Building would be higher than the existing background building which would be demolished on Fleet Street. The development would not be unduly dominant with just reveal a portion of limestone and glazing. The Court Building would remain detached from the alley and its more historic and Dickensian character. There would be no harm to the setting or significance of these listed buildings.
- 389. Overall the proposal would preserve the special architectural and historic interest and heritage significance of the 146 Fleet Street including the contribution made by setting. There would also be no harm to the significance or setting of 1-3 Wine Court which is part of the wider setting of 146 Fleet Street and within the identified SPD view/

#### St Dunstan's in the West Fleet Street (Grade I Listed)

- 390. Dating from 1830-3 by John Shaw senior and has a Ketton stone Gothic tower in the Gothic style and is surmounted by an octagonal stone lantern. The significance of the building is derived from its artistic, historic, architectural, evidential and communal values. St Dunstan's in the West is identified in the Protected Views SPD as a



City church considered to have presence on the wider skyline and forms part of the Processional Route in long views from St Paul's Cathedral to Westminster Abbey. St Dunstan's, with St Brides and the Royal Courts of Justice are key connected landmarks and their lofty spires are prominent above the varied eclectic Fleet Street townscape experienced along Fleet Street as well as from the River. This wider setting with other landmarks contributes to their overall architectural and historic significance.

391. There would be no harm to the setting or significance of the listed building in long views of St Dunstan's and this would remain as a striking silhouette and clearly legible in long views there would be no concealment or adverse visual impact.

2,3,4,5 and 6 Kings Bench Walk (Grade I listed) and 3 North Kings Bench Walk (Grade II\* listed).

392. These are a highly significant terrace of buildings within Temples Conservation Area. They are part of a terrace which defines the east side of Kings Bench Walk, and were built as chambers in the late 17th century. They are one of the most complete groups of buildings of that date in London and have high aesthetic, architectural and historic significance. Although there is a variety in the width, height and roofs, they have a strong visual unity and uniformity of appearance with a raised ground floor, central and prominent doorcase, strong cornice line and brick parapet, hipped mansard roofs and a lower ground floor, constructed of dark red and brown bricks with red dressings. Their significance is derived from their special historic and architectural interest, and evidential values due to their date, design and building, as they were constructed for, and still in use as legal chambers. There is a distinctive wide York stone pavement to the front of the terrace with a border of Purbeck setts and mature Plane trees. Kings Bench Walk is an irregular oblong shape, now used for car parking, which has a gentle slope down to the River Thames. It is bordered on the west side by 1-5 Paper Buildings, Inner Temple Library and on the south side by Inner Temple Garden.
393. The setting of these listed building is to a large degree is the registered landscape and arcadian setting by the River and the significance can be recognised here in addition to the contribution to setting of enclosing buildings and overall intimate character.
394. Within the existing setting seen from the West, a backdrop of tall modern development including Harmsworth House breach the roofline of 2-6 Inner Temple King's Bench Walk. There is a consented scheme, 65 Fleet Street, which has not yet been completed but this would also breach the roof line. These buildings (existing and consented) are clearly detached from the intimate setting and do not contribute to significance. In the existing backdrop (without the consented 65 Fleet Street development), the upper levels of the Police Headquarters would be visible above the roofline of the listed building; the materiality of the top of the buildings would be light coloured ceramic panels and planting

would soften the impact of the massing. The development would not be dominant, would blend into the wider urban layering which forms the background setting, adding to the existing backdrop and would not worsen the situation. Visibility of the Police Building would be filtered through existing mature trees.

395. In a cumulative scenario, assuming consented scheme, 65 Fleet Street, is completed, the height and massing of 65 Fleet Street would almost entirely conceal the proposed Police Building. The development would form another layer in the backdrop and would not worsen the setting to the listed building. It is considered that no harm would arise in the scenario where if the consented scheme at 65 Fleet Street is built out.
396. There would be no harm to the wider setting or significance of these listed buildings or the significance of the listed building in the existing or cumulative scenarios.

#### Inner Temple Garden (Registered Historic Park and Gardens Grade II Listed)

397. Inner Temple Garden and Middle Temple Garden have a medieval origin and have been developed from 16th – 20th centuries and play an important role in the development of the Temples. The gardens are the largest private green space in the City of London and include mature trees, shrubs, considered planting, statuary and retain a quiet domestic character and are important for the setting of surrounding listed buildings. The area is also defined by its legal professions which has evolved and continues to exist here. Significance of the Registered Historic Park and Garden is derived from successive landscape layouts, varied planting and lawned areas, and its domestic gated quiet character representing historic, evidential and aesthetic values.
398. The setting of all these assets is defined by Victoria Embankment, the wider landscaped settings and the complex of high value historic buildings which form the Inner Temples. The setting contributes to the unique intimate closure like character of this special area distant from the busy surrounding City streets.
399. The potential impact on development has been assessed from footpaths and the sweeping lawn which is scattered with trees. There would be glimpsed slithers of the Commercial Building rising above the foreground buildings of 3-6 Kings Bench Walk but this would be discreet and largely experienced between trees from incidental locations. Existing taller buildings already rise slightly over the roof line of 3-6 King Bench including the consented 65 Fleet Street and the proposed development would not worsen this existing setting. The roofscape of 9-11 Kings Bench Walk would remain preserved.
400. There would be no harm to the wider setting or significance of the registered park and garden and its heritage values would be preserved.

#### 5 Paper Buildings (Grade II Listed)

401. This is part of a wider terrace and has group value dating from 1848 in a Tudor style. The significance of the asset is derived from their artistic evidential, architectural and historic values as part of the wider Temples complex. The setting of all the asset is defined by Victoria Embankment, the wider landscaped settings and the complex of high value historic buildings which form the Inner Temples. The setting contributes to the unique intimate enclosed collegiate like character of this special area distant and separate from the busy City Streets.
402. There would be background distant glimpses of the development rising above the roof tops of the perimeter buildings. The development would very slightly encroach in incidental and glimpse views and not in an adverse manner. The impact to wider setting of 5 Paper Buildings would be similar to existing distant townscape in both the baselines and cumulative scenarios which include 65 Fleet Street. The proposals would not worsen the situation for detract from quiet enclosed setting and its contribution to significance.
403. There would be no harm to the wider setting or significance of these listed buildings.

#### 9-11 King's Bench Walk (Grade II Listed)

404. The eastern side of Inner Temple Garden is formed by Sydney Smirke's 9-11 Kings Bench Walk a four storey yellow brick terrace dating from 1814 which form continuous terrace. The significance of these assets is derived from their evidential, architectural and historic values as part of the wider Temples complex. The setting of all these assets is defined by Victoria Embankment, the wider landscaped settings and the complex of high value historic buildings which form the Inner Temples. The setting contributes to the unique intimate enclosed collegiate like character of this special area distant from the busy City Streets.
405. The potential impact on development has been assessed from footpaths and the sweeping lawn which is scattered with trees. There would be glimpsed slithers of the Commercial Building rising above these foreground buildings but this would be discreet and largely experienced between trees from incidental locations and the impact would not be adverse. Existing taller buildings already rise slightly including the consented 65 Fleet Street. The proposals would not worsen the situation for detract from the existing quiet enclosed setting and its contribution to significance.
406. There would be no harm to the wider setting or significance of these listed buildings.

#### Other listed buildings further from the development site

##### Barbican Towers (Grade II Listed)

407. These 20th century modernist towers have a distinctive and recognizable presence and silhouette on the skyline in city wide views.

These landmark buildings have architectural and historical values. The setting of the Lauderdale House, Shakespeare House and Cromwell House as part of the Barbican and experienced in views from Waterloo and Hungerford Bridge is urban layering with a diminishment in scale towards the river. The Barbican Towers are striking vertical landmarks on the skyline as a grouping and their distinctive form is central to their significance.

408. The development would add to the existing urban layering which positively defines their metropolitan setting. The development would not diminish the group value due to the already complex setting and kinetic nature of the views from the river bridges. There would be no harm to the setting or significance of these listed buildings.

#### Central Criminal Court Old Bailey (Grade II\* Listed)

409. Designed by EW Mountford 1900-1907 with a distinctive copper domed roofed dome on Portland stone base with stone lantern bearing a gilt bronze statue of Lady Justice. The significance is derived from historic, architectural and evidential values. The existing dome, lantern and Lady Justice is a recognizable silhouette on the London skyline and these significant features contribute to views from the river setting. The existing setting of the listed building is urban layering with taller buildings (Barbican Towers and 200 Aldersgate Street) background buildings and lower foreground buildings which truncate the listed building.
410. The proposed development would form a further layer and in the kinetic experience from Hungerford Bridge and Waterloo Bridge in baseline views part of the dome would be further concealed and enclosed and the setting around would be further built up. The ability to appreciate the dome would be very slightly diminished which is distinctive and integral to the overall significance of the listed building in these river views.
411. Overall, the development would result in changed setting of The Central Criminal Court. This would slightly diminish its landmark presence in baseline views from those identified Thames Bridges. There would be a degree of harm to setting and significance and this is evaluated at less than substantial, at the lower end of the spectrum.

#### Other Listed Buildings – Setting:

412. The impact of the proposals on the settings of other listed buildings has been assessed within the City of London and as part of the pre-application process, using 3 -d modelling and the theoretical zone of visual impacts analysis. The settings and the contribution they make to the significance of the listed buildings, would not be adversely affected by the proposals due to: the relative distance of the proposal where it would not appear unduly prominent; and existing built fabric blocking the view of the proposed development in the backdrop. This wider assessment concludes that the effect on significance and setting would

be neutral and would not harm the setting or the contribution that the setting makes to the significance of other listed buildings.

### **Conservation Areas**

#### **St Paul's Cathedral Conservation Area**

413. The St Paul's Conservation Area includes the Cathedral and streets to its west and is an area of international significance as well as a focal point for the City of London. The Conservation Area has historic and architectural significance because it includes the nation's most iconic baroque building designed by Christopher Wren which is synonymous with national identity and Christian worship and is seminal in English architecture. The Conservation Area is the immediate setting for St Paul's Cathedral and includes one of the largest concentrations of the City's listed buildings, non-designated heritage assets and internationally important archaeology. The context is tightly knit historic streets and alleys with open spaces around the Cathedral and Churchyard. The street scene is enriched by monuments, public sculpture, plaques and statuary. The area is associated with significant global and cultural events and is a burial place for numerous historic figures.
414. The Conservation Area includes Ludgate Hill the final part of the Processional Route which is contiguous with Fleet Street as part of the overall route from Westminster Abbey to St Pauls Cathedral. Ludgate Hill is a gently curving street and the best known approach to St Pauls Cathedral. When travelling east from Fleet Street to Ludgate Circus the west towers, dome and western façade of the Cathedral gradually reveal themselves before a full view is achieved at the crest of the Ludgate Hill.
415. The continuity of the Processional Route from Fleet Street to Ludgate Hill is part of the setting of the St Paul's Cathedral Conservation Area. The Processional Route is the ceremonial historic journey from Westminster Abbey to St Pauls Cathedral which is internationally recognised and is lined with nationally important buildings such as St Brides and St Dunstan's and the Royal Court of Justice. The Processional Route and the Fleet Street section forms the wider setting of St Pauls Cathedral and St Pauls Conservation Area. The impact of the development and the changed setting on the significance of St Pauls Cathedral has already been considered in "Indirect impacts to listed buildings". This concludes that there would be a degree of harm to the setting of St Paul's Cathedral as a listed building due to a momentary partial concealment of the lantern, dome and peristyle at the eastern corner of Fetter Lane which would slightly distract from the Cathedral pre-eminence. It is acknowledged that this is not a pristine view and that it is momentary and therefore the level of harm reduced. As the Processional Route positively contributes to the setting and significance of the St Pauls Cathedral Conservation Area is therefore considered this momentary partial concealment of the Cathedral would also change this wider setting in an adverse manner eroding this

contribution to the significance and contiguous nature of the Processional Route spanning Fleet Street Conservation Area and St Pauls Cathedral Conservation Area.

416. The Court Building and Police Building would also be visible in views looking westward from Ludgate Hill and from part of the setting. Although taller than existing buildings the development would not detract as the development would add architectural variety and interest and would integrate with Fleet Street which forms the relevant part of the setting. St Paul's Cathedral Conservation Area SPD identifies a view west to St Bride's Church steeple from Pilgrim Street (view 3). In this view the steeple terminates the view from Pilgrim Street to the Fleet Street Conservation Area, across the former Fleet Valley. This is a narrow, enclosed view and St. Bride's rises above the buildings in the foreground which are 3-4 storeys high. It forms an instantly recognisable silhouette largely against clear sky with 85 Fleet Street visible in the background. Incidental views between buildings and along alleys towards historic building is characteristic of the Conservation Area and views out form the relevant setting. St Bride's is a visual delight in this fine urban grain view which is characterised by layers of different building periods. The upper storeys of the Police Building would appear in the background but would not harm this aspect of wider setting and the key attributes of the setting would remain pre-eminent.
417. The proposed development would erode the positive contribution setting makes to the significance of St Pauls Cathedral Conservation Area due to the harm to the Processional Route which is central to the designated heritage assets setting and significance. In attaching great weight to the harm and the significance of the designated heritage this is evaluated at the lower end of less than substantial and is considered to be slight.

### **Whitefriars Conservation Area**

418. The Whitefriars Conservation Area SPD identifies the character, appearance of the Conservation Area which summarised by its architectural significance; an area dominated by high quality late Victorian and Edwardian commercial and institutional buildings laid out in a regular urban grid, these include associations with newspaper production but the area has also had a varied historic land use including Whitefriars friary precincts which also define its historic significance. The prevailing building height is four to six storeys with decorative and varied roof profiles. The predominant use of traditional materials of Portland and bath stone, red brick and terracotta with richly detailed and sculptural motifs give the area its architectural distinctiveness.
419. The setting of Whitefriars Area integrates into the urban grain to the North and the Fleet Street Conservation Area with building heights generally increasing northwards uphill towards Fleet street creating a layering of modern development in the wider setting

420. The proposals lie outside but would be visible from within the Whitefriars Conservation Area, in particular, from Carmelite Street and the junction between Whitefriars and Tudor Street, looking north.
421. The reinstatement of building frontage and enclosure of Whitefriars Street resulting from the proposed Police Headquarters, Commercial building and two pedestrian routes would enhance the setting of the Whitefriars Conservation Area in views looking north wards from Tudor Street and Carmelite Street. The light-coloured ceramic panels and the Holm Oak trees at the upper level would soften the impact of the massing which would form the background. There would be a step down to in building height to the Commercial Building, creating a further layer in the backdrop.
422. The proposed 'roof' of the Police Building would be visible in the wider setting of the Conservation Area from the South Bank in riparian views from the Victoria Embankment and the townscape ensemble of the Conservation Area defining the banks of the River Thames. As the development is set back it from this river fronting range the historic townscape would remain pre-eminent, shadowed in part by the increased scale of Peterborough Court and buildings around New Street Square, forming part of a comfortable horizon datum. From these views it would preserve the contribution of setting to the significance of the Conservation Area and in some views from Carmelite Street the background setting to the Conservation Area would be improved.
423. Overall, the proposal would preserve the significance and there would be some localised enhancement to the setting of the Whitefriars Conservation Area as a result of the proposals.

### **Temples Conservation Area**

424. The Temples Conservation Area of all the City's Conservation Areas is perhaps the most distinctive in the City comprising the Inner Temple and the Middle Temple, and Temple Church. It is located to the southwest and its significance is derived from its architectural, historic and evidential values evolved from its historic association with the order of the Knights of the Templar from the 12th century and for its subsequent links with the legal profession within the Inns of Court which still exist and function today. It has high significance due to the individual buildings, gardens, courts and lanes which have a shared historical and communal value. The significance is defined by its topography, gated entrances and buildings which are designed to face inwards to the interior of the Temples. It is a combination of buildings and open spaces and uses which have a character and quality that is collegiate.
425. The Conservation Area has a high concentration of listed Grade I, II\* and II and Inner Temple Garden is a Registered Park and Garden designated Grade II. The earliest buildings in Kings Bench Walk date from the 17th century and are one of the most complete groups of buildings of that date in London and have high aesthetic, architectural

and historic significance. There are a number of mature trees including a distinctive avenue of trees on the southern boundary with Victoria Embankment. The buildings share a uniformity of design and materials and the generous landscaped setting.

426. The setting has a clear sense of separation between the inward and enclosed quite collegiate character of Temples which turns its back on the bustle and noise of surrounding streets which define its wider setting. There are glimpses of this wider setting above rooflines and between buildings but the encroachments are modest and where buildings are visible they do not detract or dominate from the overall character, appearance or significance.
427. The development would be visible within the background setting of Temples Conservation Area and would be visible in views looking north east from Paper Buildings and Inner Temple Gardens. In views from these locations the foreground includes 1 Paper Buildings, Kings Bench Walk which is used for car parking, 2, 3, 4, 5 and 6 Kings Bench Walk (Grade I listed) and 3 North Kings Bench Walk (Grade II listed). There is a gradual slope down to the south, towards the Thames. The existing setting and backdrop of this part of the Conservation Area comprises the upper storeys of buildings to the east between Tudor Street and Fleet Street.
428. Glimpses of the upper storeys of the Police Building and Commercial Building would appear in the background views above the perimeter of the Conservation Area in a similar manner to the existing setting rising slightly above rooflines. There would be a change to the setting but consistent with the existing context the development would be glimpsed but not detract or be dominant and be incidental preserving the quiet enclosed and unique significance of Temples Conservation Area.
429. Overall the proposal would preserve the significance of the Temples Conservation Area as a result of the change to its setting.

### **Heritage Benefits**

430. Whilst there are aspects which cause significant to moderate levels of harm to the heritage there are aspects of the proposals which would deliver minor to moderate heritage enhancements summarised below:
  - Restoring the street elevation and roof of 2-7 Salisbury Court enhancing the primary significance Moderate benefit
  - Improved setting public realm on and around the site enhancing the appearance of this part of the Fleet Street Conservation Area and setting of listed buildings particularly the Waithman Obelisk, the Harrow Public House, 85 Fleet Street, Salisbury Square and the setting of Whitefriars Conservation Area. Moderate benefit
  - Improved setting and ability to appreciate St Bride's Church spire by the creation of a new public view of the designated heritage assets from the new North Passage in mid distant views Moderate benefit



- Demolition of Fleetbank House and reinstatement of the lost historic street enclosure on Whitefriars Street enhancing the setting of these parts of the Fleet Street and Whitefriars Conservation Areas. Minor benefit

### **Conclusion on Heritage**

431. It is considered that the proposal would preserve the special architectural and historic interest and heritage significance of the Harrow Public House, Whitefriars street (Grade II listed), The Punch Tavern and Offices over 98-100 Fleet street (Grade II listed), The Old Bell Public House 96 Fleet Street (Grade II), Bartholomew House 90-94 Fleet Street (Grade II listed), the Reuters and Press Association Headquarter and 9 Salisbury Court (Grade II listed), 56-57 Fleet street Former Glasgow Herald Office (Grade II listed), Tipperary Public House, 66 Fleet street (Grade II listed), Northcliffe House, Tudor Street (Grade II listed), 24 Tudor street (Grade II listed), 9 Carmelite Street (Grade II listed), Carmelite House, 8 Carmelite Street (Grade II Listed), Former Guildhall School of Music John Carpenter Street (Grade II Listed), Sion College (Grade II) , Telephone House (Grade II) , Hamilton House (Grade II) City of London School (Grade II), Unilever House (Grade II), The Daily Express Offices 120 -129 Fleet Street (Grade II\*), Mersey House 132-134 Fleet Street (Grade II), The Daily Telegraph Building 135-141 Fleet Street (Grade II Listed), 143- 144 Fleet Street (Grade II Listed), 145 Fleet Street Ye Old Cheshire Cheese Public House (Grade II Listed), 146 Fleet Street (Grade II Listed) and 1-3 Wine Office Court (Grade II Listed), St Dunstan's in the West Fleet Street (Grade I Listed); numbers 2,3,4,5 and 6 Kings Bench Walk (Grade I listed) and 3 North Kings Bench Walk (Grade II\* listed), Barbican Towers (Grade II Listed).
432. It is also considered that the proposals would preserve the Whitefriars Conservation Area and Temples Conservation Area as a result of appropriate change in their setting. There would be a minor enhancement to the setting of Whitefriars Conservation Area.
433. The proposed development would reduce the positive contribution setting makes to the significance of St Pauls Cathedral Conservation Area due to the harm to the processional route which is central to the designated heritage assets setting and significance. This will result in harm to significance at the lower end of the less than substantial scale.
434. St Pauls Cathedral is an iconic building of international importance and its historic, architectural and evidential values are of the uppermost significance and therefore great weight must be attached to this significance in evaluating any impacts. The impact in this case is transient as the development momentarily obscures part of the dome and lantern on approach around the Fetter Lane and Fleet Street junction. This impact is considered harmful and the special architectural and historic interest and heritage significance of St Paul's Cathedral would not be preserved. The harm would be less than

substantial harm and the degree of harm is considered to be low having regard to the iconic heritage status of St Pauls, the value of its significance, the momentary nature of the harm and the less than pristine quality of the baseline view of the listed building.

435. It is considered that the proposal would result in the total loss of heritage significance of six buildings deemed to be non-designated heritage assets. This would result from the demolition of Chronicle House (72-78 Fleet Street), 80-81 Fleet Street, 8 Salisbury Court, 1 Salisbury Square, numbers 35 and 36-38 Whitefriars Street. The loss of the altered remains of Hood Court, Hanging Sword Alley and through route of Primrose Hill would also result in the total loss of significance of these historic fragments of urban structure considered non-designated heritage assets.
436. The proposal would result in less than substantial harm to the Fleet Street Conservation Area, at the upper end of the spectrum. This significant level of harm would result from the demolition and total loss of significance of those six buildings deemed non-designated heritage assets, and which make modest to high contributions to the character and appearance and heritage significance of the Fleet Street Conservation Area, as a whole. The total loss of the altered and fragmentary remains of Hood Court and Hanging Sword Alley would result in the loss of these non-designated heritage assets, and their more modest contribution to the Fleet Street Conservation Area would be lost. Their respective individual local significance and intrinsic architectural, historic and artistic values, and the contribution these make to those of the Conservation Area, would be lost. Otherwise, it is considered that the siting, disposition/layout, form, bulk, massing and architectural expression of the new build proposals, whilst ascertain, are in the traditional and spirit of the Conservation Area, and would preserve its character, appearance and heritage significance.
437. The proposed development would reduce the positive contribution setting makes to the significance of St Pauls Cathedral Conservation Area due to the harm to the processional route which is central to the designated heritage assets setting and significance. This will result in harm to significance at the lower end of the less than substantial scale.
438. The proposals would fail to preserve the setting and would result in some minor less than substantial harm, at the lower end of the spectrum, to the special interest and heritage significance of St Bride's Church, as the result of a slight diminishment in its local and wider riparian townscape presence, in particular in important views of civic/historical resonance. There would conversely be a minor enhancement to its significance as a result of a proposed new vista to the rear of the proposed Courts Building.
439. The proposals would fail to preserve the setting and would result in some minor less than substantial harm, at the very lower end of the spectrum, to the special interest and heritage significance of the Old Bailey, as a result of a slight diminishment of its tower silhouette in wider important riparian views.

440. There would be a level of moderate less than substantial harm to 2-7 Salisbury Court due to the extent of demolition and loss of historic fabric.

**Conclusion on Listed Building Consent 20/00998/LBC 2-7 Salisbury Court:**

441. The proposal would result in some less than substantial harm, at the lower end of the spectrum, failing to preserve the special architectural and historic interest and heritage significance of the listed building. This harm would result from the loss and alteration of historic fabric of interest. Otherwise the substantive remodelling and scholarly restoration new build element would preserve and enhance special interest and heritage significance, subject to detail reserved for condition.
442. Overall, the proposal would conflict with Local Plan Policies CS 12, DM 12.1 and DM 12.3, draft City Plan 2036 policies S11 and HE1 London Plan Policy 7.8 and draft Publication London Plan Policy HC 1 and Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
443. When addressing the balancing exercise, this harm has been afforded considerable importance and weight, and account taken of the importance of those heritage assets as a grade II listed buildings in accordance with the advice given in paragraph 193 of the NPPF that great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). The full heritage planning balance is considered at the end of the report under Assessment of Public benefits and the paragraph 196 NPPF balancing exercise

**Conclusion on Listed Building Consent 20/00996/LBC Waithman Memorial, Salisbury Square:**

444. The proposal, subject to detail reserved for condition, would preserve and enhance the special architectural and historic interest and heritage significance of the Memorial, enhancing the contribution made by setting as a result of its new siting. The proposals would be in accordance with Local Plan Policies CS 12, DM 12.1 and DM 12.3, draft City Plan 2036 policies S11 and HE1, London Plan Policy 7.8 and draft Publication London Plan Policy HC 1 and Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
445. When addressing the balancing exercise, this harm has been afforded considerable importance and weight, and account taken of the importance of those heritage assets as grade II and II\* listed buildings in accordance with the advice given in paragraph 193 of the NPPF that great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). The full heritage planning balance is considered at the end of the report under

Assessment of Public benefits and the paragraph 196 NPPF balancing exercise.

### **Strategic Views, London-wide and Local**

446. The impact of the development has been carefully considered through the planning process using 3 -d modelling and a comprehensive townscape views impact assessment (TVIA) prepared in accordance with the EIA Regulations and associated guidelines.

### **London View Management Framework (LVMF)**

447. The site falls outside of Protected Vistas in the LVMF but impacts on a number of the identified Assessment Points. The development would not be visible from 10A.1 (Tower Bridge North Bastion), 18B.1 (Westminster Bridge). The magnitude of change in these broad panoramas is considered negligible, and in all it would accord with the visual management guidance preserving that composition and the viewers ability to recognise and appreciate the Strategically Important Landmarks

#### **LVMF 11A.1 London Bridge (Upstream)**

448. This view is a single assessment point at the southern end of the Bridge and upstream where St Paul's Cathedral is identified as the Strategically Important Landmark, with other identified landmarks including towers of Cannon Street Station, the Old Bailey and St Bride's Church, which are also singled out at paragraph 192 of the LVMF SPG
449. The proposed development would be visible in the distant background of the view. Visible elements would be limited to upper storeys of the Police Building particularly the plant and the roofline of the Court Building. The proposal would preserve the ability to recognise and appreciate St Paul's Cathedral, would not dominate it and would be sympathetic to it and its relationship with the Cannon Street Station towers in accordance with the visual management guidance at paragraphs 193, 194 and 197. The development would be to the left of St Bride's Church and the Court Building would step down in scale towards the spire. The Court Building would slightly encroach on the pristine sky-etched silhouette, which would otherwise still be discernible as a whole.
450. The proposal would result in a very slight adverse impact on the singularity of St Bride's as an identified landmark element, diminishing its skyline clarity, though it would retain an overall legibility and prominence. This would result in some limited conflict with Policy HC4 (A), harming the contribution of a landmark element in baseline and cumulative scenarios. Otherwise the proposal would preserve the setting of St Paul's as the Strategically Important Landmark, other identified landmark elements and the juxtaposition between them would

be preserved and there would be no harm the characteristics or composition of the view in accordance with Policies HC 4, CS 13 and the associated LVMF SPG guidance.

#### LVMF 12A.1 Southwark Bridge

451. This view is located at the centre of Southwark Bridge and upstream and is dominated by St Paul's Cathedral. St Bride's Church is identified in the view and is referred to in paragraph 210 of the LVMF SPG as part of the layering of history in the view. The proposed development would be visible in the background of the view, with visibility limited to upper storeys of the Police Building which would be prominent on the skyline rising above the overall established building heights. The development would be to the left of St Bride's Church and the Court Building upper floors would step down in scale towards the spire in a similar manner to LVMF 11A.1. The Court Building would slightly encroach on the pristine sky-etched silhouette, which would otherwise still be discernible as a whole. The development would be visible in the background and distinctly separate element. The development would not be visible in 12A.2.
452. The proposal would result in a very slight adverse impact on St Bride's as an identified landmark element, diminishing its skyline clarity, though it would retain an overall legibility and prominence. The impact would be similar to 11A.1. This would result in some limited conflict with Policy HC4 (A), harming the contribution of a landmark element in baseline and cumulative scenarios. Otherwise the proposal would preserve the setting of St Paul's as the Strategically Important Landmark, other identified landmark elements and the juxtaposition between them would be preserved and there would be no harm the characteristics or composition of the view in accordance with Policies HC 4, CS 13 and the associated LVMF SPG guidance.

#### LVMF Millennium Bridge (13A.1)

453. From River Prospect 13 A.1, the development particularly the upper storeys of the Police Building would be visible well to the left of St Brides Church. There would be no impact on the spire in this northwest view from Millennium Bridge. The height massing and palette of materials in this view would integrate into the rich urban layers of the townscape and would step down in scale to the River. There would be no impact on St Paul's Cathedral in this view and the development would be a minor addition to the overall viewing experience. The development would not be in the view as experienced at viewpoint 13B.1
454. The development would preserve the existing setting of St Paul's as the Strategically Important Landmark, other identified landmark elements and the juxtaposition between them, and would not harm the characteristics or composition of the view in accordance with Policies HC 4, CS 13 and the associated LVMF SPG guidance.

#### LVMF 15B. 1 and 15 B. 2 Waterloo Bridge Downstream

455. Paul's Cathedral is identified as the Strategically Important Landmark in this kinetic and iconic view in daytime and night time. St Bride's Church (grade I), Old Bailey (grade II\*) and the Barbican (grade II) are identified in the view as recognisable buildings on the skyline in the LVMF SPG. There would be no impact on the ability to appreciate St Paul's Cathedral due to the distance from the site and overall the development would comply with the Visual Management Guidance set out in paragraphs 262-264 of the LVMF SPG.
456. In assessing the baseline impacts of the development to 15B.1 and 15B.2 these are a kinetic viewing experience from this River Prospect, the development would be visible to the near left hand side and as part of the urban layering set back from the river front. St Brides Church spire lowest tier in the existing view is already very slightly concealed by the existing building 65 Fleet Street. The earthen coloured upper storeys of the Police Building, substantial plant and the uppermost storey of the Commercial Building would be visible above the foreground treeline some distance from these viewpoints. In the kinetic view the development would encroach on St Bride's Church spire almost entirely at some moments concealing the arcaded arches of the lowest tiers. Closer to 15 B.2 there would be partial concealment of the dome of Old Bailey. Although the impacts are some distance from the viewpoints the juxtaposition of the development with Old Bailey and St Brides would be slightly reduce the ability to appreciate these key landmarks.
457. If cumulative impacts are considered however including the approved development at 65 Fleet Street ( 19/00058/FULMAJ approved 30.04.2019) there would be no further worsening of the composition or ability to appreciate legible landmarks and identified buildings within the kinetic view. The development as approved at 65 Fleet Street would conceal St Brides and the Old Bailey in a similar manner as proposed in this application with only a de minimise impact.
458. The development would preserve the existing setting of St Paul's as the Strategically Important Landmark. But there would be some limited conflict with Policy HC4 (A), harming the contribution of the landmark elements St Brides and the Old Bailey in baseline scenarios. Otherwise the proposal would preserve the setting of St Paul's as the Strategically Important Landmark, other identified landmark elements and the juxtaposition between them would be preserved and there be would no harm the characteristics or composition of the view in accordance with Policies HC 4, CS 13 and the associated LVMF SPG guidance.
459. In cumulative scenarios the development would preserve the existing setting of St Paul's as the Strategically Important Landmark, other identified landmark elements and the juxtaposition between them would be preserved and there would not harm the characteristics or composition of the view in accordance with Policies HC 4, CS 13 and

the associated LVMF SPG guidance.

LVMF 16A.1 , 16B.1 and 16 B.2 The South Bank National Theatre and Gabriel's Wharf

- 460. The development would within the field of view in 16A.1 which is focussed on Somerset House and would not affect the landmarks identified.
- 461. 16B.1 and 16B.2 are located close together on the viewing platform both orientated towards Paul's Cathedral at the centre of the view. St Brides Church is part of the townscape setting of St Paul's Cathedral and is identified in the view. The development would not impact on the ability to appreciate St Paul's Cathedral as a landmark within the view and the development would not be overly horizontal in appearance and would add to the overall urban layering and stepping down of townscape.
- 462. The development would preserve the existing setting of St Paul's as the Strategically Important Landmark, other identified landmark elements and the juxtaposition between them would be preserved and there would be not harm to the characteristics or composition of the view in accordance with Policies HC 4, CS 13 and the associated LVMF SPG guidance.

LVMF 17B.1 and 17 B.2 Golden Jubilee /Hungerford and kinetic views (downstream)

- 463. St Paul's Cathedral is identified as the Strategically Important Landmark in these kinetic views and its setting would be preserved.
- 464. St Bride's Church is identified as a landmark building within the view and Old Bailey and the Barbican are also identified within the view. Para 300 SPG refers to "The spire of St Brides and the dome of the Old Bailey are distinctive vertical elements seen against the sky." On the urban skyline St Brides currently has a clear sky backdrop in these views; the Barbican Towers and Old Bailey are experienced within urban layers of foreground and background development.
- 465. In assessing the baseline impacts of the development to 17 B.1 to 17 B.2 these are a kinetic viewing experience the development would appear to the left projecting slightly above the trees on the Embankment but would be some distance from St Paul's Cathedral. The uppermost floor of the Commercial Building would be partially visible stepping down from the Police Building towards the river as is characteristic of the townscape in this view. The impacts on this view would be similar to 15B.1 and 15B.2. The roof plant and the uppermost storey of the Police Building would conceal the lower half of Cromwell House part of the Barbican Towers and part of Old Bailey. The Commercial Building would encroach on the foreground of the lowest tier of St Bride's spire concealing a very small amount of the base of the spire within the kinetic experience.

466. Cromwell House is part of the wider Barbican Towers group and is sufficiently robust to remain distinctive. St Bride's Church spire and Old Bailey dome are more sensitive to change due to their more diminutive scale. Considering the baseline impacts there would be a degree of further concealment of the Old Bailey in 17 B.1 but not 17 B.2 dome and there would be no worsening to the impact to St Brides in 17 B.1 or 17 B.2
467. If cumulative impacts are considered including the approved development at 65 Fleet Street then there would be no further worsening of the composition or ability to appreciate legible landmarks and identified buildings within the kinetic the view. The development as approved at 65 Fleet Street (19/00058/FULMAJ approved 30.04.2019) would conceal St Brides and Old Bailey in a similar manner as proposed in this application.
468. The development would preserve the existing setting of St Paul's as the Strategically Important Landmark. This would result in some limited conflict with Policy HC4 (A), harming the contribution of landmark elements the Old Bailey and St Brides in baseline scenarios. Otherwise the proposal would preserve the setting of St Paul's as the Strategically Important Landmark, other identified landmark elements and the juxtaposition between them would be preserved and there be would no harm the characteristics or composition of the view in accordance with Policies HC 4, CS 13 and the associated LVMF SPG guidance.
469. In cumulative scenarios the development would preserve the existing setting of St Paul's as the Strategically Important Landmark, all identified landmark elements and the juxtaposition between them, and there be would no harm to the characteristics or composition of the view in accordance with Policies HC 4, CS 13 and the associated LVMF SPG guidance

#### Summary of LVMF Impacts

470. The development would preserve the existing setting of St Paul's as the Strategically Important Landmark. In LVMF 15 B.1, 15 B.2 and 17 B.1 and 17 B.2 the baseline proposals would result in a slight concealment of St Brides and Old Bailey contrary to Policies HC 4 (A). Otherwise the proposal would preserve the setting of St Paul's as the Strategically Important Landmark, other identified landmark elements and the juxtaposition between them would be preserved and there be would no harm to the characteristics or composition of the view in accordance with Policies HC 4, CS 13 and the associated LVMF SPG guidance. The baseline proposals would not be fully compliant with Local Plan Policy CS 13(1), draft City Plan 2036 Policy S13 and London Plan 2021 policy HC4 and guidance contained in the LMVF SPG.
471. In LVMF 11A.1 and 12A.1 in baseline and cumulative scenarios would



result in a slight concealment of St Brides Church contrary to Policies HC 4 (A). Otherwise the proposal would preserve the setting of St Paul's as the Strategically Important Landmark, other identified landmark elements and the juxtaposition between them would be preserved and there would be no harm to the characteristics or composition of the view in accordance with Policies HC 4, CS 13 and the associated LVMF SPG guidance. The baseline and cumulative proposals would not be fully compliant with Local Plan Policy CS 13(1), draft City Plan 2036 Policy S13 and London Plan 2021 policy HC4 and guidance contained in the LVMF SPG.

472. The Mayor has raised no objections to the impacts on these LVMF views.

### **Other Protected Views**

473. The City of London Protected Views SPD provides guidance on the St Pauls Heights code, relevant (LVMF) Strategic Views, views from and to the Monument, views to and from the Tower of London World Heritage Site and views of historic City landmarks and skyline features. The site is not located within St Pauls Heights Policy Area, the Monument Views Policy area or the Local Setting of the Tower of London. The SPD identifies Historic City Landmarks and Skyline Features which includes St Brides Church and St Dunstan's in the West as a "City Church with a Skyline Presence" and Old Bailey and Barbican Towers are recognisable landmarks. The SPD is supported by Local Plan Policy CS 13(1), draft City Plan 2036 Policy S13 and London Plan 2021 policy HC3 and guidance contained in the LVMF SPG.

### **St Paul's Cathedral and the Processional Route**

474. The impact on St Pauls Cathedral and its setting is identified in the SPD Protected Views are assessed in detail in the LVMF and also under Indirect Impacts to Listed Buildings.

### **The Monument to the Great Fire:**

475. The Protected Views SPD identifies views of and approaches to the Monument which are deemed important to the strategic character and identity of the City. The development would be visible within View 5. There would be no impact on the appreciation of St Pauls Cathedral. The development would be subordinate and appear behind St Brides Church which is a skyline feature in the panorama of the western part of the City from the Monument. There would be no adverse impact on St Brides as a skyline feature.

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

476. The Tower of London World Heritage Site is located a substantial distance to the south east of the scheme. The proposed development

will be concealed from key viewpoints of and from the Tower (including those identified in the World Heritage Site Local Setting Study) and therefore will not harm any of the attributes of the Outstanding Universal Value of the World Heritage Site including setting.

#### Golden Gallery and Stone Gallery and other views from St Paul's Cathedral

477. Exceptional public views of London are afforded from the Golden Gallery and Stone Gallery of St. Paul's. Looking westwards from the viewing platform the development would occupy a central position in the view. The Commercial Building would step down towards the River and would successfully integrate into the layers of the historic townscape. The Police Building would sit behind the spire of St Brides and would be below the apex of the spire. St Brides Church spire would remain legible and distinctive from the new development on the skyline. There would be no harm to the appearance and design of rooves as experienced from the Golden Gallery and Stone Gallery.

#### Summary of Protected Views

478. The proposal would not harm the overall characteristics and composition of St Paul's Cathedral in local views but there would be a slight diminishment in the legibility of city skyline landmarks from Hungerford Bridge, Waterloo Bridge, Southwark Bridge and London Bridge and parts of the Southbank as identified in the LVMF Strategic View Section. The development would not fully comply with Local Plan Policy CS 13(1), draft City Plan 2036 Policy S13 and the Protected Views SPD. The level of harm would be minor adverse.

#### Archaeology

479. The area has high archaeological potential where remains of all periods may be expected to survive. Fleet Street is on the line of a principal Roman road leading west from the City and Ludgate and has been an important route since that time.
480. An Historic Environment Assessment, Written Scheme of Investigation for Archaeological Evaluation and Phase 1 Interim Archaeological Evaluation Report have been submitted with the application.
481. The site is in an area of archaeological potential and remains from all periods may be expected to survive. On the south side of the site, there is some potential for remains relating to land reclamation on the edge of the Thames and Fleet rivers. There is potential for remains from the Roman period, including burials, as evidence of land utilisation, occupation and structures are recorded in the near vicinity. The site is adjacent to the medieval monastic precinct of Whitefriars to the west and St Brides Church to the east. The Bishop of Salisbury's Inn was on the site in the 12th until the 16th century when it became the home of the Earl of Dorset. There is potential for settlement and buildings, including evidence of the 1666 Great Fire, from the later and post-medieval periods, relating to the development of this area outside

the City walls and the significance of Fleet Street as a route between the City and Westminster over a long period of time.

482. Salisbury Square has high potential for survival of buried archaeological remains from the Roman, medieval and post-medieval periods as it has been an open area since at least the 12th century. It was the Great Court of the Bishop of Salisbury's inn from the 12th century to 1564. There is potential for remains of the inn, the Salisbury Court Playhouse, built 1724, and the Salisbury Court Flint glass house, destroyed by the Great Fire and rebuilt in the 1680s, to survive. Remains of the Salisbury Court Playhouse and the Salisbury Court Flint glasshouse are potentially of national importance.
483. The potential for survival is affected by disturbance from the construction of existing building basements and the level of potential varies across the site.
484. The Historic Environment Assessment is supplemented by results of the Phase 1 archaeological evaluation which has been carried out. Remains are likely to survive across much of Salisbury Square, below the existing ground surface, due to the absence of existing and historic basements, with the exception of a possible below ground chamber in one area. It is considered that no remains survive below Hanging Sword Alley due to existing deep basements. A second phase of evaluation is planned in basements of the buildings in Fleet Street, Salisbury Square and Salisbury Court which are currently inaccessible. There is moderate potential for remains to survive in these areas as survival will have been affected by basement construction and existing foundations.
485. The proposed development comprises three new buildings on the north and west sides of the site, with three basement levels which would remove all archaeological remains within the new buildings' footprint. 2-7 Salisbury Court would be retained, the existing basement would be lowered and there would be new foundations. Salisbury Square would be re-landscaped and the proposals, including new planters, tree planting, new street furniture and the re-positioning of the Waithman memorial, which would have a minimal below ground impact.
486. The planned second phase of evaluation would provide additional details of archaeological survival on the site and supplement the results of the Historic Environment Assessment and Phase 1 evaluation and would inform the design of appropriate archaeological mitigation.
487. The proposals are acceptable subject to conditions to cover details of the second phase of evaluation, a programme of archaeological work and foundation design.

### **Justification for proposals**

488. Fleet Street Feasibility Study commissioned in 2017 assessed the development opportunities for the Salisbury Square site. Led by Eric Parry Associates this focused on the massing for three potential uses: a CoLP headquarters building; a combined Courts building; and

commercial use. The feasibility studies considered six different levels of onsite - building retention/and or partial or total demolition of the buildings on site to enable the delivery of the proposal and to best meet the development brief. All options accepted the demolition of Fleetbank House as this was universally agreed to make a negative contribution to the setting of conservation areas and the townscape.

489. The layout options were assessed against various operational and accommodation requirements; floorspace for 3 buildings; shared secure subterranean spaces; and security requirements. This was balanced against townscape with a focus on St Bride's Church and St Paul's Cathedral sightlines, heritage and a priority to improve permeability, public realm and Salisbury Square s to identify the most favorable masterplan option. During this process 69-71 Fleet Street freehold was acquired during the process to increase options and flexibility. The alternative options were not discussed as part of the pre-application stage with CoL planning officers but are included as supporting information in the Design and Access statement as part of the justification for the proposed development.
490. The Capital Buildings Committee preferred option proposed demolition of all buildings on the site apart from 2-7 Salisbury Court. The demolition of 8 Salisbury Court and 1 Salisbury Square enabled an opportunity to enlarge Salisbury Square as a public space making it more usable and better quality with increased sunlight in the south facing quarter as well as providing sufficient space to enable functionality of the Police Building. The Court Building was located to Fleet Street which optimised height and width to the site with the HMTCS requirements. The Police Building the tallest block was located to the centre to reduce townscape impact and the location of the commercial building to the south enabled delivery of grade A office space and maximised floor space in a less sensitive location.
491. Eric Parry Architects went on to win a restricted competition in November 2018 to develop a masterplan to planning application stage organised by the City of London Corporation. The current proposals reflect amendments and evolution due to HMCTS, CoL, City of London Planning and stakeholder feedback. The very specific requirements of HMCTS and the City Police generate limited design flexibility and have dictated location, layout, entry points, height, massing and to some extent design approach for the Court and Police Building.
492. The HMTCS building requires the delivery of a state-of-the-art combined courts facility with specific objectives which define standards for structure, layout, technology, security, circulation routes and facilities set out in the Court and Design Guide February 2019. The intention is that the new facility would replace the Mayor and City of London County Court and Magistrates Court providing: 18 courtrooms; judicial chambers; HMCTS offices; public areas; jury facilities; security spaces; custodial facilities; back of house areas; and car parking. The experience of the Police Accommodation Strategy evidenced to the Corporation the depth and complexity of the requirements and the

difficulty of converting existing heritage assets or commercial office buildings into operationally effective police stations. The City of London Police brief is to co-locate functions across the city to a single flagship headquarters which has facilities and technology to deliver modern policing for residents, visitors, tourists and workers as well as supporting local and national terrorism threat and intelligence functions.

493. The requirements include: 18, 580 sq m net internal space to provide police Areas including cells and forensics; non- Police Areas/Corporate areas as well as back of house spaces. The commercial building and the public realm have considerably more flexibility in terms of layout and design but are required to be compatible with the functionality and security needs of the adjoining new buildings.

### **Public Art and Cultural Strategy**

494. Policies CS11 and DM11.2 in the Local Plan 2015 and policy S6 in the Draft City Plan 2036 encourage new cultural experiences and art works. Policy S6 in the Draft City Plan 2036 requires the production of Cultural Plans for major developments.
495. The new Court Building will provide a unique cultural and artistic activation on the ground floor façade, thereby mitigating the impact of the proposed loss of retail units and floorspace on the vitality of this part of Fleet Street. The Court building has a length of 73 metres on Fleet Street and has been conceived from the outset as a ‘canvas’ for art.
496. A public art project has been instigated which has identified ten panels on the Fleet Street façade for art which may vary in size along the façade due to the change in topography. The panels range in size between 2.7 m x 2.7m and 4.3m x 2.7m. It is intended that each of these panels will have a painting or sculpture by a selected artist. The selection of the artists will be subject to an invited competition and shortlisting. It is anticipated that proposals will be received by mid-2021 and a final decision made before the building works begin on site.
497. The proposed activation of Fleet Street with art is supported, and delivery of the proposed public art project would be secured by condition.
498. It is proposed that the bust and plaque relating to the politician and journalist TP O’Connor is moved from Chronicle House to the retained Grade II Listed Building at 2-7 Salisbury Court. Both ‘Bradbury and Evans’ and ‘Fleet Street Conduit’ plaques would be relocated from the existing buildings on Fleet Street to the proposed Courts building’s main elevation. This would be secured by conditions.
499. The submitted Cultural Plan suggests that further cultural offers including Museum of London events, Open Justice facilities, educational tours, food and drink events in the new public house at 2-7 Salisbury Court and outdoor events in the enlarged and improved Salisbury Square are all being considered. A Cultural Strategy would be required by condition A further heritage interpretation area is the

new party walls enclosing the new public alley connecting Whitefriars Street to Primrose Hill

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

### **Public Transport**

- 500. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B.
- 501. The site is located close to Blackfriars and City Thameslink National Rail Stations and to Blackfriars and Chancery Lane underground stations and is also close to several bus routes on Fleet Street.
- 502. The submitted Transport Assessment indicates that as a result of the proposed reduction in commercial floorspace and the introduction of land uses with less concentrated arrival and departures times, and fewer staff based on site the development proposals would result in a reduction in demand on the surrounding highway and public transport network capacities.

### **Long Stay Cycle Parking**

- 503. London Plan 2021 policy T5 requires cycle parking be provided at least in accordance with the minimum requirements published in the plan. Policy T5 requires cycle parking to be designed and laid out in accordance with guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.

### **Court Building**

- 504. The London Plan 2021 requires 18 long stay cycle parking spaces, 1 for each FTE staff at the Court Building. The applicant is proposing 21 long stay cycle parking spaces; in excess of the London Plan standards.
- 505. The cycle parking would be located at lower ground floor and accessed via a lift from an entrance on Salisbury Court.
- 506. Three showers and 21 lockers are proposed alongside the cycle parking. The locker provision is in line with the London Plan 2021 policy 10.5.7, which recommends a minimum of 2 lockers per 3 long-stay spaces. The shower provision is compliant with the London Plan 2021 policy 10.5.7, which is at least 1 shower per 10 long-stay spaces.

### **Police Building**

- 507. The police building is considered a Sui Generis use class. For Sui Generis uses the London Plan 2021 requires the most relevant other standard be applied. In this case the same standard as the Court Building has been applied, 1 cycle parking space for each 8 FTE staff. A total of 114 long stay cycle parking spaces are required. The applicant is proposing 140 long stay cycle parking spaces; in excess of the London Plan standards.
- 508. The cycle parking would be located at basement 2 level and accessed via a lift from an entrance on the Southern Passage.

509. 14 showers and 140 lockers are proposed alongside the cycle parking. The locker provision is in line with the London Plan 2021 policy 10.5.7, which recommends a minimum of 2 lockers per 3 long-stay spaces. The shower provision is compliant with the London Plan 2021 policy 10.5.7, which is at least 1 shower per 10 long-stay spaces.

#### Commercial Building

510. The London Plan 2021 requires 158 long stay cycle parking spaces, 1 for each 75m<sup>2</sup> of office floorspace. The applicant is proposing 158 long stay cycle parking spaces, in line with the London Plan standards.
511. The cycle parking would be located at basement level 1 and accessed via a lift from a dedicated entrance on Southern Passage.
512. 16 showers and 158 lockers are proposed alongside the cycle parking. The locker provision is in line with the London Plan 2021 policy 10.5.7, which recommends a minimum of 2 lockers per 3 long-stay spaces. The shower provision is compliant with the London Plan 2021 policy 10.5.7, which is at least 1 shower per 10 long-stay spaces.
513. For all three buildings a mix of cycle parking is proposed to ensure the spaces can accommodate a wide range of users. In each building at least 10% of spaces would be provided in the form of Sheffield stands and 5% of spaces would be able to accommodate larger adapted bicycles.

#### Retail Unit

514. The London Plan 2021 requires 2 long stay cycle parking spaces, which are proposed alongside 2 lockers and one shower in line with the London Plan standards.
515. The cycle parking would be located at basement level 1 and accessed via a lift from a dedicated entrance on Southern Passage

#### Public House

516. The London Plan 2021 requires 7 long stay cycle parking spaces, which are proposed alongside 1 shower and 7 lockers in line with the London Plan standards.
517. The cycle parking would be located at basement level 1 and accessed via a lift from a dedicated entrance on Southern Passage.
518. The applicant will be responsible for promoting the use of the cycle parking spaces and as such will be required by planning obligation to produce a Cycling Promotion Plan which is a cycling focused Travel Plan. It will be submitted to the City for approval in line with the London Plan 2021 policy T4 and 10.4.3.

#### Short Stay Cycle Parking

519. For all the proposed uses the total short-stay cycle parking provision required by London Plan 2021 policy is 285, broken down as follows;
- 189 spaces for the court building
  - 14 spaces for the police building

- 12 spaces for the office building
  - 57 spaces for the public house
  - 13 spaces for the retail unit
520. 116 short-stay cycle parking spaces are proposed within the public realm surrounding the site in the form of 58 Sheffield stands in the Northern Passage and in Salisbury Square.
521. 169 short-stay cycle parking spaces are proposed within a Cycle Hub. The hub would be accessed via a dedicated lift from the Southern Passage. Through the cycling promotion plan, the development will be required to fund the commissioning of a logo for the short stay cycle parking. This logo will inform members of the public of the availability of free to use, publicly accessible cycle parking.
522. The proposed short stay cycle parking provision is compliant with London Plan 2021 policy. The amount of cycle parking space in the public realm is considered appropriate when balancing the need to provide cycle parking, with the need for the public realm to provide space for movement and for people to dwell, and the provision of an internal cycle hub is welcome as an innovative way to meet short stay cycle parking requirements while maintaining a high quality public realm.

#### **Vehicular access and parking**

523. Local Plan 2015 Policy DM16.5 – 1 and Draft City Plan 2036 policy VT3 – 1 require development in the City to be car-free except for designated Blue Badge spaces.
524. The existing office building provides 24 car parking spaces at basement level, accessed via a ramp from Whitefriars Street. These spaces would be removed, and the proposed commercial building would be car-free.
525. 30 car parking spaces are proposed within the shared basement for the CoLP's rapid response fleet. The spaces would be fitted with electric vehicle charging points.
526. 9 motorcycle bays are proposed alongside the car parking for rapid response motorcycles.
527. Two blue-badge parking spaces are proposed for judicial officers within the shared basement. A further two operational spaces for use by juvenile/vulnerable detainee custody vehicles are proposed.
528. The internal car parking would be accessed through the shared basement which would be accessed via a vehicle crossover from Whitefriars Street.
529. The provision of vehicle parking for the Police and Court buildings, as key operational requirements for the specific uses proposed, is considered acceptable.

#### **Servicing and deliveries**

530. Policy DM16.5 of the Local Plan and draft City Plan 2036 Policy VT2 –



1 require developments to be designed to allow for on-site servicing. Policy VT2 – 2 requires major commercial development to provide for freight consolidation. Policy VT2 – 4 requires delivery to and servicing of new developments to take place outside peak hours (7am – 10am, 12pm – 2pm and 4pm – 7pm on weekdays) and requires justification where deliveries within peak hours are considered necessary. London Plan 2021 policy T7 G requires development proposals to provide adequate space for off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.

- 531. Deliveries to the Courts, Police and Commercial buildings would take place within the shared basement. To achieve the required level of security for the basement two lines of security are proposed. The first secure line will provide access to the commercial building servicing yard, the second secure line will provide access to the basements of the Court and Police buildings.
- 532. Rising bollards are proposed at the northern end of Primrose Hill. These bollards would be operated by an agent appointed on behalf of the City as Highway Authority. The exact regime for the control of the bollards will be secured and agreed by condition. The rising bollards will allow public highway access to the servicing yard for the neighbouring 8 Salisbury Square to be maintained while mitigating potential conflicts with arrivals to the basements for the Courts, Police and Commercial buildings.
- 533. Deliveries to the Courts, Police and Commercial buildings would come to the site via a secure off-site consolidation centre, secured by condition. Following a reduction in vehicle trip rates to account for this consolidation, it is estimated that the total site would generate 80 delivery and servicing vehicle trips per day which is a reduction from the estimate of current servicing demand. It is proposed the number of deliveries to the development per day is capped at 80 and this will be secured by condition.
- 534. Waste collection will take place in the same way as all other servicing vehicles and will be included in the daily cap of 80 vehicles.
- 535. The applicant has agreed to no servicing of the Court, Police and Commercial buildings within the basement between 0700 and 1900. This will be secured by condition and will ensure the shared basement is free for operational requirements during the day and will minimise conflict between servicing and operational vehicles.
- 536. The Court building will require the delivery of case files, which will not come from an off-site freight consolidation centre due to the time-sensitive nature of these deliveries. The deliveries would take place on-street. These deliveries would be well suited for cargo bikes and the delivery and servicing plan (DSP) will include a commitment for HMCTS staff to work with the legal industry and cargo bike operators to establish a framework for case file deliveries to be made by cargo bike.
- 537. The public house is estimated to generate demand for up to 7 servicing vehicles per day, which would be included in the overall daily cap of 80

vehicles. Security requirements limiting the access through the basement to the Public House mean that servicing of the Public House will be undertaken from the Salisbury Court kerbside. Servicing of the public house would be restricted outside of the peak pedestrian hours between 7am – 10am, 12pm – 2pm and 4pm – 7pm and this will be secured by condition.

538. The retail unit is estimated to generate demand for up to 2 servicing vehicles per day, which would be included in the overall daily cap of 80 vehicles. Security requirements limiting the access through the basement to the retail unit mean that servicing of the retail unit will be undertaken from the Whitefriars Street kerbside. Servicing of the retail unit would be restricted outside of the peak pedestrian hours between 7am – 10am, 12pm – 2pm and 4pm – 7pm and this will be secured by condition.
539. The development will be required to produce a DSP and this will be secured by a condition. Detail on the management of all delivery and servicing activity to the site will be set out in the DSP, as well as measures to further reduce the impact of deliveries beyond the mitigation secured by the other conditions detailed above.

### **Trip Generation**

#### **Court Building**

540. Trip generation for the Court Building has been estimated using a first principles approach, due to the lack of survey data for this land use. The arrival profile is based on the different groups who will use the court, the total number of each group who may travel to the site on a single day and the maximum number of each group who may be present at each time. A temporal profile for each court attendee group has been provided, based on a typical court day, to indicate the arrival and departure times for each group.
541. Based on this assessment, it is estimated that in the AM peak between 8 and 9am, 342 people would arrive to the site, and in the PM peak between 5 and 6pm 244 people would leave the site.

#### **Police Building**

542. Trip generation for the Police Building has been based upon information provided by the police, in the absence of survey data for police facilities. On a typical day, 910 staff may be present at the Police Building, including administrative and operational staff. This would be estimated to result in approximately 323 arrivals in the AM peak and 323 departures in the PM peak.

#### **Commercial Building**

543. Based on survey data, the Commercial building would be expected to generate 372 trips in the AM peak between 8 and 9am and 339 trips in the PM peak between 5 and 6pm.

### Net change in trip generation

- 544. The total trip generation for the site, including the public house and retail uses, is estimated to be 1,035 trips in the AM peak hour and 904 trips in the PM peak hour.
- 545. The estimated trip generation for the existing site, based on the same trip rates used to estimate the trip generation for the commercial building, predicts 1,156 trips in the AM peak and 1,054 trips in the PM peak.
- 546. As a result of the proposed reduction in commercial floorspace and the introduction of land uses with less concentrated arrival and departures times, and fewer staff based on site, the proposed development would be expected to result in 121 fewer trips to the site in the AM peak and 150 fewer trips to the site in the PM peak.

### **Vehicular Trip Generation**

#### Servicing vehicles

- 547. Following a reduction in delivery and servicing vehicle numbers achieved through the use of an off-site consolidation centre, and the introduction of a cap on deliveries of 80 per day, the development proposals would be expected to result in a reduction in the number of vehicles servicing the site, with approximately 13 fewer vehicles trips each day.
- 548. All motorised delivery and servicing vehicles would be retimed outside of peak pedestrian hours of 7am – 10am, 12pm – 2pm and 4pm – 7pm, with the majority retimed to take place between 7pm and 7am.

#### Courts Building

- 549. The courts building would be expected to generate 8 custody vehicle trips in the AM peak hour and 4 custody vehicle trips in the PM peak hour. These trips rate have been calculated based on activity at the Central Criminal Court, with an uplift applied given additional magisterial court activity.
- 550. The Court Building would also generate vehicular trips associated with the two blue badge parking, and two spaces for the drop off of juvenile/vulnerable defendants.

#### Police Building

- 551. Parking for 30 rapid response vehicles and 9 motorcycles would be provided in the basement of the Police Building. The nature of these vehicles makes it difficult to accurately predict likely arrival and departure patterns.

### Conclusion

552. The proposals would see an increase in operational vehicular at the site not associated with typical delivery and servicing trips, owing to the nature of the proposed uses. The reduction in the number of delivery and servicing vehicles, the retiming of these deliveries to minimise conflict with operational vehicle movements, and the removal of 24 car parking spaces on site would serve to mitigate the impact of the increase in operational vehicle trips. The vehicular trip generation associated with the proposed development would not be considered likely to unduly impact the surrounding highway network.

### Pedestrian Comfort

553. An assessment of the impact of the proposals on pedestrian comfort levels (PCLs) is provided within the Transport Assessment. The assessment is based on pedestrian survey data from 2017. The COVID-19 pandemic has meant that the applicant has been unable to collect up to date pedestrian surveys due to the significant change in work and travel patterns.
554. The Transport Assessment argues that the use of 2017 data is robust, as trips generated by the proposed development are expected to be fewer than the existing development, and because the existing trip generation estimate does not include the retail and banking facilities on the Fleet Street frontage, with the Sainsbury's Local a major attractor of trips.
555. As the proposed development would be expected to generate fewer trips than the existing development, the PCL assessment focusses the impact of the proposed highway changes on comfort levels, assuming pedestrian flows around the site remain the same as in 2017 when the survey data was collected.
556. The PCL assessment includes 22 locations, 6 each along Fleet Street and Salisbury Court/ Dorset Rise and 10 along Whitefriars Street. Of the 22 locations assessed, an increase in clear footway width is proposed in 10 locations, the footway would remain the same width in six locations and a reduction in clear footway width is proposed in 6 locations. The reduction in clear footway is proposed to accommodate security measures, on both Fleet Street and Whitefriars Street, and to accommodate the widening of the carriageway at the bottom of Whitefriars Street.
557. As a result of the narrowing of the clear footway width on Fleet Street, two pinch points would be created on Fleet Street. In these locations the PCL would fall from a B and B- to a C+. Along the Fleet Street frontage of the site the comfort level would fall to C+ for approximately 10m of the site frontage and remain the same or improve for the remaining 70m of frontage.
558. The recommended minimum for all areas is a B+ and through our Transport Strategy we aim to achieve a minimum of B+ on all City streets. Transport for London's Pedestrian Comfort Guidance describes a C+ as acceptable in Office and Retail areas.

559. As part of the evaluation and design of the S278 agreement the widening of the footway along Fleet Street to achieve a minimum comfort level of B+ will be investigated. The applicant will fund the footway widening if this proves feasible.
560. A PCL rating of F is automatically applied for footways where the clear width is below 1.9m. Of the 22 locations assessed, 11 currently have a clear footway width of less than 1.9m. As a result of the proposals, 5 of the locations along Whitefriars Street and 1 on Salisbury Court would have footways widened by 1.9m and the PCL would increase from F to A+.
561. 5 of the locations are beyond the proposed building frontages and so the applicant is not able to widen the footways by setting back the building line. In these locations the footway width and PCL of F would remain.
562. In 2 of the locations assessed at the bottom of Whitefriars Street, the footway narrowing proposed to accommodate two way vehicular movement would result in a clear footway width of 1.65m, reduced from 2.05m and 1.83m respectively, and a PCL of F. This footway narrowing is proposed in response to a security risk associated with the arrival of Custody vehicles.
563. Through detailed design of the highway works, options to maintain as much clear footway as possible while mitigating the risk will be explored, as well as options to mitigate the impact of the footway narrowing on pedestrian comfort, including the introduction of a raised table at the junction of Whitefriars Street and Tudor Street and the removal of street furniture.
564. Overall, the pedestrian experience around the site is expected to improve as a result of the proposals, notwithstanding the introduction of the two pinch points due to the proposed security measures on Fleet Street.

### Highway Changes

#### 565. Fleet Street

- The proposals include the relocation of the bus stop on Fleet Street from in front of the Court building, to the east on the other side of the junction with Salisbury Court.
- The proposals include the introduction of a line of hostile vehicle mitigation at the edge of the Fleet Street footway.
- The plans show the introduction of two trees on the Fleet Street highway. These trees are shown indicatively and their location, in the middle of the footway, has not been agreed.

#### 566. Whitefriars Street

- Whitefriars Street is currently one-way for motorised vehicles heading north, with a contraflow lane allowing cyclists to travel south. The proposals include the introduction of southbound

movement for rapid response police vehicles from the rapid response egress ramp.

- To provide for southbound rapid response egress, and to ensure custody vehicles arriving to the Courts are not obstructed, the applicant is proposing to widen the carriageway and the southern end of Whitefriars Street. This would require the narrowing of the existing footway to 1.65m on each side of Whitefriars Street, for approximately 30m.
- The proposals include the removal of pay and display and motorcycle parking, and the introduction of no waiting and loading restrictions for much of the length of Whitefriars Street. Some facility for loading will be maintained to serve Fleet Street and the surrounding area, the exact level of which will be informed through the S278 works.
- The proposals include the removal of a blue badge parking bay on Whitefriars Street.
- The frontages of all three buildings would be set back along Whitefriars Street, allowing for widened footway to be provided.

#### 567. Salisbury Court/ Dorset Rise

- Dorset Rise is currently two-way up to Salisbury Square. Following the removal of vehicular access around the square, the applicant is proposing to make Dorset Rise one-way southbound between Salisbury Square and Hutton Street.
- Improvements to the contraflow cycle lane, including the introduction of a protective island at the point Dorset Rise becomes one-way to motorised vehicles.
- To facilitate the contraflow cycle lane, the applicant is proposing the relocation of two disabled parking bays from the western side of Dorset Rise to the eastern side of Salisbury Court, opposite Salisbury Square
- The applicant is proposing to remove two small lengths of motorcycle parking on Dorset Rise.
- The applicant is proposing to alter the Salisbury Court carriageway adjacent to Salisbury Square, to provide a pedestrian priority extension of the square and improve the connection to St Bride's Passage to the east.

#### 568. Salisbury Square

- The applicant is proposing to remove vehicular access around 3 sides of Salisbury Square, except for infrequent access for servicing of the UKPN substation.
- The pedestrianized three sides of Salisbury Square will need to be subject to an order under section 249(2A) of the Town and Country Planning Act 1990 in order to remove the public's right to use vehicles around the square.

#### 569. Primrose Hill

- The proposals include the stopping up of the staircase linking Primrose Hill to Salisbury Square, which is public highway.
- To prevent Primrose Hill becoming a dead end, the applicant is proposing to introduce a stepped alleyway between the proposed servicing access and The Harrow Public House. The stepped route would be 1.1m wide and would be designated as permissive path.
- The proposals include the introduction of rising bollards on the Primrose Hill carriageway, to control vehicular access into the area of public highway between the two security lines for the proposed development. The operation of the bollards would be subject to a management agreement, to be submitted to the City for agreement prior to the installation of the bollards, secured by condition.

570. The proposed changes to parking would be subject to a separate statutory procedure and associated public consultation which cannot be prejudged by this application. The proposed changes to on-street parking provision will be developed through the highway scheme of works.

#### Highway Scheme of Works

571. If planning permission were to be granted, the applicant would be required to agree a highway scheme of works pursuant to a condition detailing the necessary works to the highway required as part of the development, as set out above. The scope of the highway scheme of works will include, but not be limited to;

- Improvements to the footways surrounding the site
- The introduction of southbound access on Whitefriars Street for rapid response vehicles leaving the site
- The realignment of kerb lines and alterations to kerbside restrictions to minimise potential obstructions on the access to the site, and any necessary alterations to mitigate the impact of carriageway widening
- The introduction of pedestrian priority measures and improvements to cycling infrastructure along Salisbury Court and Dorset Rise
- The extension and enhancement of Salisbury Square, including additional planting, seating and drainage
- The introduction of security measures on the highway on Fleet Street and Salisbury Square
- The relocation of the bus stop on Fleet Street
- The relocation of the police checkpoint and layby on Fleet Street
- The widening of the footway along the southern Fleet Street footway within the vicinity of the site, if this proves feasible subject to the Healthy Streets Plan and discussions around the ring of steel infrastructure on Fleet Street.

#### Stopping Up

572. The proposals would require the stopping up of several area of public

highway;

- Parts of Hanging Sword Alley
- The staircase connecting Salisbury Square to Primrose Hill

573. The proposals would require the removal of vehicular access right across three sides of Salisbury Square.

574. The proposals would include highway to be dedicated as follows;

- The newly created north and south passages and the newly created extension to Salisbury Square.

575. In total approximately 699 sqm of highway would be stopped up and approximately 783sqm of highway would be adopted, resulting in a net increase of approximately 84sqm of highway.

### Security Measures

576. Draft Publication City Plan 2036 policy SA3 2 states that “security measures should be designed within the development’s boundaries and integrated with those of adjacent buildings and surrounding public realm. Area-wide approaches should be considered”.

577. Draft Publication City Plan 2036 policy SA3 3 states that “All development should be designed to minimise the need for Hostile Vehicle Mitigation on the public highway. Developers will be expected to contribute towards the cost of necessary and proportionate on-street mitigation of the risk of vehicle attacks in the vicinity of their developments, or within a wider area where area-based security measures are proposed.”

578. Draft Publication City Plan 2036 policy SA3 3 states “An assessment of the environmental impact of security measures will be required. It should address the visual impact and impact on pedestrian flows.”

579. A line of hostile vehicle mitigation (HVM) along the Fleet Street frontage of the site is proposed. This protective line would continue to the west around the corner onto Whitefriars Street and to the east further along Fleet Street across the junction with Salisbury Court. The plans show a line on bollards with some benches and stone art features. The final composition of this protective line would be subject to detailed design through the S278 works.

580. A line of HVM is proposed along the edge of the Salisbury Square public realm. The HVM would consist of planters and bollards. Three of the bollards at the southern end of the protective line would be removable to facilitate access for UKPN substation maintenance.

581. A line of HVM is proposed at the junctions of the North and South Passages where they meet Whitefriars Street. These bollards would sit on the public highway following the dedicated of these new routes as such.

582. The transport assessment includes an assessment on the impact of the proposed security measures on pedestrian comfort levels, the results of which are included in the section on pedestrian comfort.



583. The City's Public Realm Security Advisory Board can assist in considering whether exceptional circumstances exist to support security measures on the public realm, and whether those measures are proportionate to the level of risk. A risk assessment demonstrating the need and likely mitigation will be considered by the Board in order to assess whether that case is made in the context of critical infrastructure and / or publicly accessible crowded spaces, and to assess any outstanding concerns & issues. That Board will help assess the detailed design of those proposals in due course.

#### **Construction Logistics**

584. The submission of a deconstruction logistics plan and construction logistics plan will be secured by condition. The logistics arrangements will be developed in consultation with the City's Highways Licensing and Traffic Management teams to minimise the disruption to neighbouring occupiers and other highway users.

#### **Waste Collection**

585. Refuse collection would be undertaken from within the servicing areas, which would accommodate a 7.75m refuse vehicle and 7.5T truck.
586. The City of London's Cleansing Team have confirmed that the proposed waste storage and collection facilities complies with their requirements.

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

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

#### **Wind Microclimate**

588. Computational Fluid Dynamics (CFD) simulation and analysis has also been carried out in accordance with the City of London's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.
589. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways, building entrances, public open space and private roof terraces. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being 5 Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.
590. A separate safety criterion is also applied to ascertain if there are any

safety risks to pedestrians or cyclists.

591. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as a result of development. If wind conditions become windier but remain in a category suitable for intended use, or if there is negligible or beneficial effect, wind mitigation is not required.
592. Assessments have been carried out for both the worst season (September-May) and the summer season (June-August), and this is covered in Chapter 11 of the Environmental Statement and Appendices 11A, 11B and 12 of the Environmental Statement.

#### Wind Conditions at Ground Level

593. In the summer season, all on-site ground level areas would be suitable for their proposed uses and no off-site areas would worsen by one Lawson comfort criteria or more.
594. In the worst season, the south-western corner of the enlarged Salisbury Square would be suitable for standing, one Lawson comfort criteria worse than the intended use of occasional sitting. However, when the proposed landscaping is added to the CFD analysis, this is improved to the appropriate criteria of occasional sitting. The remainder of the on-site ground level areas would be suitable for their intended use.
595. Two off-site areas, to the north west of the site, on Fleet Street directly in front of the Court building and on the northern end of Whitefriars Street, would worsen by one Lawson comfort category, but would be suitable for the intended use of standing.

#### Private terraces on the Court Building and Police Building

596. There are four areas on the private roof terraces that would not be suitable for their intended use.
597. In the summer season and worst season an area on the western side of the Court Building roof terrace would be suitable for pedestrian standing, one Lawson comfort criteria worse than the intended use of occasional sitting (moderate adverse impact).
598. In the summer season the north-western corner of the Police Building roof terrace would be suitable for walking, one Lawson comfort criteria worse than the intended use of standing (moderate adverse impact). In the worst season this area would be uncomfortable, two Lawson comfort criteria worse than the intended use of standing (moderate adverse impact).
599. In the summer season and worst season, just north of the south-eastern corner of the Police Building roof terrace there is an area which would be suitable for standing, one Lawson comfort criteria worse than

the intended use of occasional sitting (moderate adverse impact).

600. In the summer season and worst season, just west of the south-eastern corner of the Police Building roof terrace there is an area which would be suitable for walking, two Lawson comfort criteria worse than the intended use of occasional sitting (moderate adverse impact).
601. There are two areas on the western side of the Police Building terrace that breach the safety criterion (major adverse impact). Areas of danger (exceedance of the safety limit) are defined by the City of London's Guidelines as those where wind speeds are above 15m/s for more than two hours per year. The indicated areas of possible danger (as defined by the City of London Guidelines) are on a private roof terrace, which would only be accessible to occupiers. It is likely that the nature of these spaces would be known to these users where access to the roof space would be managed by the building management team. A management process would be put in place where signage would be displayed during these most windy few hours of the year to advise occupiers not to go out onto the roof terrace. The design of these spaces has been guided by their use in summer, balanced against the desire for shelter on the coldest, windiest days of the year.

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

602. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the Building Research Establishment (BRE) guidelines and considered having regard to policy D6 of the London Plan, policy DM 10.7 of the Local Plan and policy DE8 of the draft City Plan. Policy D6D of the London Plan 2021 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing, and maximising the usability of outdoor amenity space. The BRE guidelines can be used to assess whether harm is likely to occur. The approach indicated by planning policy is that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings. Local Plan policy DM10.7 states that development which would reduce noticeably the daylight and sunlight to nearby dwellings and open spaces to unacceptable levels taking account of BRE guidelines, should be resisted. The draft City Plan requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards taking account of its context. The residential buildings to be considered are those at 148 Fleet Street, 145 Fleet Street, 143 and 144 Fleet Street, 142 Fleet Street, the Harrow Public House at 22 Whitefriars Street and 24 Tudor Street. The open space to be considered is Salisbury Square.
603. Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises

such as offices are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. The proposed development provides a degree of separation with the neighbouring commercial occupier, 8 Salisbury Square, such that it would not have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended occupation. Levels of daylight and sunlight to the commercial premises would remain appropriate to the context of the City. As such the proposal is not considered to conflict with Local Plan Policy CS10.

## **Daylight**

- 604. Daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL), These are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assesses the proportion of a room in which the sky can be seen from the working plane.
- 605. The BRE Guidance state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction.)
- 606. Both the London Plan 2021 and the draft City Plan 2036 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.
- 607. Of the buildings with residential accommodation assessed, three were assessed as experiencing a negligible effect within the BRE Guidelines. The impact on each neighbouring residential building is outlined below.

### **148 Fleet Street**

- 608. 148 Fleet Street stands to the north of the site, on the opposite side of Fleet Street.
- 609. A total of 12 windows serving eight rooms have been tested within this building.
- 610. All eight rooms would fully comply with the BRE Guidelines for VSC and NSL, experiencing a negligible impact.

611. Overall, the effect of the proposed development on daylight to this building is considered to be negligible.

#### 145 Fleet Street

612. 145 Fleet Street stands to the north of the site, on the opposite side of Fleet Street.
613. A total of seven windows serving three rooms have been tested within this building.
614. None of the three rooms would meet the BRE Guidelines for VSC, however the impact is considered to be a minor adverse impact with losses between 22.25% and 26.05% from the baseline figures.
615. The average retained VSC value for the building is 18.45% with all rooms retaining VSC values between 16.44% and 20.69%. This is higher than the average VSC for buildings in the vicinity of 14.51%. Therefore, the retained VSC values are considered to be reasonable in the context of the local area.
616. All three rooms would fully comply with the BRE Guidelines for NSL, experiencing a negligible impact.
617. Overall, the effect of the proposed development on daylight to this building is considered to be minor adverse, but with retained levels of daylight appropriate for a building in this area.

#### 143-144 Fleet Street

618. 143-144 Fleet Street stands to the north of the site, on the opposite side of Fleet Street. It appears that at the present time the building is in use as short-term lets although the use can revert to permanent residential without the need to apply for planning permission.
619. A total of 22 windows serving nine rooms have been tested within this building.
620. One of the nine rooms, the fifth floor bedroom, would meet the BRE Guidelines for VSC and experience a negligible impact. The impact to the remaining eight rooms (four living rooms and four kitchens on the first to fourth floors) is considered to be moderate adverse with losses of between 30.46% and 38.88% from the baseline figures.
621. Three of the nine rooms (the first, second and third floor living rooms) would meet the BRE Guidelines for NSL and would experience a negligible impact. Of the remaining six rooms, the impact to the fifth floor bedroom is considered to be minor, the impact to the first and fourth floor kitchens is considered to be moderate, and the impact to the second and third floor kitchens and the fourth floor living rooms is considered to be major adverse.
622. Overall, the effect of the proposed development on daylight to this building is considered to be moderate adverse, but with retained levels of VSC in line with average VSC levels in the vicinity.

#### 142 Fleet Street

623. 142 Fleet Street stands to the north of the site, on the opposite side of

Fleet Street.

- 624. A total of 23 windows serving four rooms have been tested within this building.
- 625. None of the four rooms would meet the BRE Guidelines for VSC. The impact to the rooms on the first and second floors, which are living rooms, is considered to be minor with losses of 25.18% and 28.11% from the baseline figures. The impact to the rooms on the third and fourth floors, which are bedrooms, is considered to be major adverse, with losses of 36.44% and 34.08% from the baseline figures. However, in line with BRE guidance bedrooms, require less daylight.
- 626. The first floor living room would meet the BRE Guidelines for NSL, experiencing a negligible impact. Of the remaining three rooms the impact to the second floor living room is considered to be minor, the impact to the third floor bedroom is considered to be moderate adverse, and the impact to the fourth floor bedroom is considered to be major adverse.
- 627. Overall, the effect of the proposed development on daylight to this building is considered to be moderate adverse, but with retained levels of VSC in line with average VSC levels in the vicinity.

The Harrow Public House, 22 Whitefriars Street

- 628. The Harrow Public House is situated directly to the south of the site.
- 629. A total of four windows serving four rooms have been tested within this building.
- 630. All four rooms would fully comply with BRE Guidelines for VSC, experiencing a negligible impact.
- 631. Three of the four rooms (a bedroom, living room and kitchen on the third floor) would meet the BRE Guidelines for NSL, experiencing a negligible impact. The impact to the remaining room, a bedroom, is technically major adverse with a loss of 43.74% from the baseline figure. However, this room would see direct sky to only 10.01% of its area in the existing baseline condition and so any reduction from this would be artificially magnified. In real terms, the absolute loss equates to just 4.38% and it is questionable whether this would be noticeable. In addition, as the room is thought to be a bedroom, in line with BRE guidance bedrooms, require less daylight.
- 632. Overall, the effect of the proposed development on daylight to this building is considered to be negligible.

24 Tudor Street

- 633. 24 Tudor Street stands to the south of the site, on the corner of Whitefriars Street and Tudor Street.
- 634. A total of 15 windows serving four rooms have been tested within this building.
- 635. All four rooms would comply with the BRE Guidelines for VSC and NSL, experiencing a negligible impact.

636. Overall, the effect of the proposed development on this building is considered to be negligible.
637. The adverse impacts experienced by 142 and 143 and 144 Fleet Street are created by the proposed massing of the Court building. The initial assessment carried out by the applicant's consultant Delva Patman Redlar found more significant daylight and sunlight impacts and to minimise these and remove any major adverse impact in VSC the Court building was amended in RIBA Stage 3. The amendments included reducing the height of the building by 1.2m and setting back the shouldering, both of which have reduced the impact whilst still maintaining a viable scheme. The applicant has indicated that further reductions in height necessary to deliver improvements in daylight and sunlight cannot be achieved whilst retaining necessary accommodation and ceiling heights within the proposed Court building.

### **Sunlight**

638. The BRE Guidelines state that to assess loss of sunlight to an existing building all main living rooms of dwellings should be checked if they have a window facing 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block too much sun. To quantify the available sunlight, the BRE Guidelines advise measuring the percentage of Annual Probable Sunlight Hours (APSH), which is defined as "the total number of hours in the year that the sun is expected to shine on unobstructed ground, allowing for average levels of cloudiness for the location in question".
639. The BRE Guidelines state that sunlight to neighbouring buildings will be adversely affected if the centre of the window will receive less than 25% of APSH (calculated over the whole year) or less than 5% APSH during the winter months (between 21st September and 21st March); and less than 0.8 times its former sunlight during either period; and the reduction in sunlight over the whole year would be greater than 4%.
640. APSH has been calculated over the whole year (annual sunlight) and between 21st September and 21st March (winter sunlight). All rooms within the neighbouring residential properties that have a window facing within 90 degrees of due south have been included in the assessment. Due to orientation, 24 Tudor Street has no windows that qualify.

#### **142, 145 and 148 Fleet Street and The Harrow Public House, 22 Whitefriars Street**

641. The ten rooms tested in these buildings would either meet the BRE Guidelines target for APSH (25% annual sun and 5% winter sun) or experience a 0-19.9% reduction from the existing baseline figures, experiencing a negligible impact.
642. Overall, the effect of the proposed development on sunlight to 142, 145, 148 Fleet Street and the Harrow Public House, 22 Whitefriars Street is considered to be negligible.

#### **143 and 144 Fleet Street**

643. A total of four rooms have been tested within this building.

- 644. The first and second floor living rooms would fully comply with the BRE Guidelines for APSH, experiencing a negligible impact.
- 645. The third and fourth floor living rooms would exceed the 25% annual sunlight target, achieving 34% and 52% APSH. However, both rooms would fall below the 5% winter sunlight target, achieving 3% and 4%. The losses in winter sunlight would be large at 66.67% and 71.43% but the reductions are magnified by the low existing figures. These rooms would achieve excellent annual sunlight, with the retained winter sunlight similar to or higher than those experienced on the floors below.
- 646. Overall, the effect of the proposed development on sunlight to this building is considered minor adverse.

### **Overshadowing of Salisbury Square**

- 647. BRE Guidelines recommend that for an external space to appear well lit at least 50% of the area should receive at least two hours of sunlight on March 21st. If as a result of development an amenity area does not meet the above and the area which receives two hours of direct sunlight is reduced to less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.
- 648. The recommended two hour sun on ground test is not met in the existing baseline condition on 21st March, with only 0.01% of the area receiving at least two hours of sunlight. The proposed enlarged Salisbury Square would also not meet the guidelines, but would deliver a significant improvement, with 6.59% of the area receiving at least two hours of sunlight on the 21st March.
- 649. As suggested by the BRE Guidelines, an additional test has been run on 21st June to assess the sunlight available in the summer. The results demonstrate that the recommended standard would be exceeded with the proposed development, with 74.24% of the area receiving at least two hours of sunlight. The square would receive very good levels of sunlight in the summer months when it is likely to be most used and is an improvement to the existing baseline condition.
- 650. Overall, the effect is of the proposed development on the overshadowing of the square is considered to be minor beneficial.

### **Daylight and Sunlight Conclusion**

- 651. The applicant has made changes to the height and bulk of the Court building to deliver improvements to the impact on daylight and sunlight. There are a small number of major and moderate adverse impacts, but for many windows and rooms the impact is considered to be minor adverse or negligible. Where there are moderate or major adverse impacts, retained levels of VSC are appropriate to the local context. When considered against the wider benefits of the scheme, including the substantial improvements to Salisbury Square and sunlight to the square, these impacts are considered to be acceptable and in line with policy DM10.7 of the Local Plan, policy DE8 of the emerging City Plan and D6 of the London Plan.

### **Solar Glare**



652. Four key viewpoints have been identified and assessed for solar glare impacts. The effect is considered to be negligible for Fleet Street (travelling west), and minor adverse for Fleet Street (travelling east), Salisbury Court (travelling north) and Whitefriars Street (travelling north).
653. For the majority of the year there would be a negligible impact. The nature of the proposed glazing and cladding does mean that reflected solar glare would be unavoidable at certain times of day, assuming that there are clear skies. At worst the effect would be minor adverse and therefore not significant, lasting no more than 38 minutes at any one time, and would not be detrimental to the safe movement of pedestrians and vehicles on the pavements and roads surrounding the proposed development.

### **Thermal Comfort Assessment**

654. London Plan Policy D8 and D9 and the emerging City Plan 2036 Policy S8 indicates that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings - wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.
655. In accordance with the City of London Thermal Comfort Guidelines an outdoor thermal comfort assessment has been prepared. The technique involves merging wind, sunlight, temperature and humidity microclimate data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.
656. The Universal Thermal Climate Index (UTCI) metric has been utilized for predicting thermal comfort. The usage categories for thermal comfort is set out below and is used to define the categorization of a given location:

Usage Category	% of hours with Acceptable UTCI	Description
All Season	≥90% in each season	Appropriate for use all year round (e.g. parks)
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).
Short Term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round
Short Seasonal Term	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.
Transient	≤25% in winter OR ≤50% in any other season.	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).

657. Four configurations have been assessed including; the existing site with existing surrounding buildings, existing buildings with any buildings with planning permission built out, the proposed development with the existing surrounding buildings and the proposed development with cumulative surrounding buildings.

658. Both the landscaping and the wind mitigation measures considered during the wind microclimate assessments have been included in the study.

#### Ground Level Amenity Spaces

659. The extended Salisbury Square represents the main amenity space within the Site.

660. The baseline existing conditions for Salisbury Square range from “Seasonal” to “All Season”. With the Proposed Development in place, the thermal comfort conditions remain suitable for the indented pedestrian use ranging from “Seasonal” to “All Season” for the majority of Salisbury Square with an area of the Square an area at the southern entrance to Salisbury Square that is likely suitable for “Short term” use.

661. All the outdoor seating areas situated in front of the public house at 2-7 Salisbury Square and along the perimeter of Salisbury Square are comfortable all year-round (“All Season”)

662. The majority of the public seating within the Salisbury Square are comfortable all year-round and some more open areas are likely to be

appropriate for more seasonal use. One planter/seat adjacent to the area at the southern entrance to Salisbury Square that is likely suitable for short term use.

663. The conditions at the ground level amenity spaces would be would continue to be suitable for the intended pedestrian use.

#### Onsite thoroughfare locations

664. The main onsite thoroughfares are the two new and improved ground level north and south passageways being created which would connect Whitefriars Street with Salisbury Square and Salisbury Court. The baseline existing conditions for the areas and existing routes through the site range from “Seasonal” to “All Season”.
665. With the Proposed Development in place, the thermal comfort conditions along the North Passage would range from “Seasonal” to “Short term use.
666. With the Proposed Development in place, the thermal comfort conditions on along south passageway would range from “Seasonal” to “Short term use at the entrance to Salisbury Court.
667. Enclosed areas in the surroundings of the Proposed development are likely to be appropriate for use year-round, and some more open areas, including Whitefriars Street and Salisbury Court, are likely to be appropriate for use during most of the year.

#### Terraces

668. The terrace of the commercial building is likely to be appropriate for use year-round use. The sheltered areas of the court building terraces are likely to be suitable for “ All Season” uses, however the more exposed parts are more suitable for “Short term “use. The most exposed areas of the court building terrace are most suitable for “Short term” use. The terrace of the Police building is suitable for “Seasonal” use, with some areas more suitable for “Short term” and “Short-term” to “Seasonal” use.

#### Offsite thoroughfare locations

669. The main offsite thoroughfares are Fleet Street, to the north of the Site, Whitefriars Street, located west and Salisbury Court to the east of the Site.

#### Fleet Street

670. The baseline existing conditions Fleet Street to the north of the Proposed development appropriate for “Seasonal “use with an area to the north of Poppin’s Court currently suitable for “Short” term use. With the Proposed Development in place, the thermal comfort conditions on Fleet remain suitable for the indented pedestrian use with increased areas of “Short-Term” ranging to “Seasonal” use.

#### Whitefriars Street

671. The baseline existing conditions Whitefriars Street to the west of the

Proposed development appropriate for range from “Seasonal” to “All Season”. With the Proposed Development in place, the thermal comfort conditions on Whitefriars Street remain suitable for the indented pedestrian use with “Seasonal” use to the majority. An area of “Short Term” use appears at the northern end of Whitefriars in the Proposed consented scenario.

#### Salisbury Court

672. The baseline existing conditions Salisbury Court to the east of the Proposed development appropriate for range from “Seasonal” to “All Season”. With the Proposed Development in place, the thermal comfort conditions on Salisbury Court remain suitable for the indented pedestrian use with “Seasonal” use to the majority. Small areas of “Short Term” use at the northern and southern end of Salisbury Court.

#### Thermal Comfort Conclusion

673. The Proposed Development’s impact on thermal comfort in the existing pedestrian realm is expected to be minor to negligible.
674. All the transitory and standing areas including roads, crossings, thoroughfares, entrances and bus stops are predicted to achieve appropriate thermal comfort conditions post-construction.
675. The thermal comfort conditions for all the ground level amenity spaces are suitable for the intended use ranging from “Seasonal” to “All Season”. All the outdoor seating areas located south of Public House and the extended Salisbury Square would be comfortable all year-round. Salisbury Square and the new public seating are assessed as suitable for the intended use ranging from “Seasonal” to “All Season” with an area at the entrance to the south passageway as only “Short” term dwelling space.
676. The thermal comfort conditions on the terrace level amenity spaces of the Proposed Development mainly range from “Seasonal” to “All Season” and would be considered to be suitable for intended the intended use.
677. It is considered that the thermal comfort in and around the site, would be acceptable in accordance London Plan Policy D8, Policy D9 and emerging City Plan policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

#### Air quality

678. Heating and hot water will be generated via air source and ground source heat pumps which is welcomed. The emissions associated with the vehicle trips have been assessed and should have negligible impact on the local air quality. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment.

#### Access and Inclusive Design

679. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of

disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1, HL1 and S8 of the draft City Plan 2036 and policy 7.2 and D5 of the London Plan. The City's Access Officers has been involved in the evolution of the scheme and the City of London Access Group (CoLAG) have been consulted.

- 680. The proposed development seeks to maximise pedestrian connectivity where possible, whilst maintaining the security and operational requirements needed for the Court and Police Buildings.
- 681. All horizontal and vertical access within all three buildings have been designed to the recommendations set out in the Approved Document M and BS8300. Lifts would be the main means of vertical circulation within the building and have been designed to accommodate a variety of users, including wheelchair users.

### Court Building

- 682. The new public Court building would be located to the north of the site, with its primary elevation to Fleet Street. There are four entrances on Fleet Street, Salisbury Court and Whitefriars. The main public entrance on Fleet Street accessed via pair of inclusive circle-slide doors leads into an open foyer that offers a visual connection through to the new public realm to the south.
- 683. The Court building provides separate access and circulation routes through the building and into the court rooms for the judiciary, jurors and the public in order to comply with HMCTS security standards.
- 684. The design of the Court and Hearing rooms is specified to accommodate the necessary standards for 2025 and beyond and to support the HMCTS reform programme's aims of making justice more accessible. The Hearing rooms layout provides access for wheelchair users for defendants, witnesses and the judiciary and staff. All hearing rooms would be equipped with induction loops and microphones.
- 685. An accessible 'Wellness' terrace level 7 provides high-quality outdoor space for judges and HMCTS staff.
- 686. London Plan 2021 Policy S6 states that large-scale developments that are open to the public should have a Changing Places facility. The Court Building will provide a Changing Places facility, details and location of which are to be provided by condition.

### Police Building

- 687. The proposed City of London Police Headquarters faces onto Salisbury Square with level access provided via two sets of circle-slide inclusive doors. These are part of the main entrance providing public access to the Police Station and police personnel access to the building. Lifts would be the main means of vertical circulation within the building and have been designed to accommodate a variety of users, including wheelchair users. Step-free access is provided to all parts of the building, including an accessible roof terrace on level 9 for staff. Accessible WCs are provided throughout the building. Accessible cycle parking facilities are included.

### Commercial Office Building

688. The commercial office building would be in the south west corner of the site. The main office entrance to this building is via two circle-slide inclusive doors. All accommodation and facilities are served by accessible lifts; three main passenger lifts, two cycle lifts - one for the office tenants and one for the public cycle hub. A platform lift is provided from reception to an upper waiting area and an enclosed platform lift is provided from level 08 to the roof terrace. Accessible WCs are provided throughout the building, including on levels terrace. Accessible cycle parking facilities are included.
689. There are several ramps at Whitefriars Street entry level for back of house access to bin stores and the goods lift. All ramps are compliant and range from 1:13 to slopes of 1: 21.
690. A retail unit is located at ground and lower ground levels with level accesses from ground level provided from Whitefriars Street and first floor level from the southern passage. A platform lift is provided between the ground and first floor of the retail unit. Step-free access is provided to the lower ground floor retail unit from two level entrances on Whitefriars Street but there is no step free route this area from ground floor of the unit. Details of a step free access to all parts of retail unit is required by condition.
691. A cycle-hub for public use would be in the second basement level with level access from southern passage and served by a dedicated lift. Only cyclists with standard cycles and the ability to use the cycle wheel ramp on the South Passage staircase would be able to access directly from Whitefriars Street, as the platform lift is not a suitable as a cycle lift.

### Public House

692. A new public house is provided with the list building at 2-7 Salisbury Court to provide a new bar area overlooking the square to the south, level access is provided through the main entrance via two pairs of double doors on Salisbury Square. The ground floor bar would be level with the terrace outside and provides fully accessible entrance to the bar from the south. Two stepped entrances to the building are provided from the east (Salisbury Court) into the bar and accessing the new stair and lift. Details of the step free access arrangements are required by condition.

### Salisbury Square and Public Realm

693. Salisbury Square will be designed as an open and publicly accessible space with planting and public seating. A raised table would be created on Salisbury Court across the full length of the enlarged square to improve step-free circulation and create a pedestrian priority environment. Details of the landscaping including the surface finishes, tactile paving and the public seating will be secured by condition.
694. At the northern edge of the enlarged Salisbury square introduces level

access into the public house but this achieved by constructing a raised table and tapered steps. The tapered steps are not considered to be an appropriate solution as people that are blind or partially sighted require an even height riser when ascending or descending. The applicant has agreed to review access into this area and amendments would be sought by means of revising condition to alter the steps.

#### **North and South Routes**

- 695. The proposed development includes an accessible public realm that provides two new east-west pedestrian links and an extended and improved Salisbury Square. The site topography has significant changes in levels from west to east.
- 696. The northern passage route would be retained with gradients less than 1:20 and existing staircases removed to create a step-free route. This will be the primary route through the site to the west.
- 697. The southern route incorporates a series of steps to bridge existing site levels and a public lift is proposed to make east-west route accessible for all. Details of the lift, its operation and maintenance will be secured by condition.

#### **Disabled parking bays and Cycle spaces**

- 698. The development would result in the deletion three of the five existing the disabled bays currently provided adjacent to the site. Deleted spaces are located on Whitefriars Street and Dorset Rise. Two new disabled parking bays are proposed adjacent to the Square on Salisbury Court (with potential for the current doctors' bay to be converted to disabled bay). Two disabled car parking bays would be provided within the Court basement car park for use by Judiciary officers.
- 699. London Plan 2021 Policy T6.5, London Plan 2015 Policy DM16.5 and draft City Plan 2036 Policy VT3 reference to car-free developments except for disabled persons/ Blue Badge parking.
- 700. For all three buildings a mix of cycle parking is proposed to ensure the spaces can accommodate a wide range of users. In each building at least 10% of spaces would be provided in the form of Sheffield stands and 5% of spaces would be able to accommodate larger adapted bicycles.

#### **Noise and Vibration**

- 701. The submitted Environmental Statement includes an assessment of the impact from noise and vibration on the surrounding area, including noise and vibration from the enabling works, demolition and construction; noise from the proposed development during operation; and noise associated with increases in road traffic, which could be attributed to the development.
- 702. Generally, in City redevelopment schemes most noise and vibration

issues occur during demolition and early construction phases. Noise and vibration mitigation, including control over working hours and types of equipment to be used, would be included in a Construction Management Plan to be approved by condition.

703. The proposed development includes a large amount of mechanical plant which would be located at both roof and basement levels, and would include extract fans, air handling units, heat pumps and condenser units. To ensure that noise from plant is adequately controlled and minimised conditions are required related to plant noise and vibration.
704. All deliveries would take place within dedicated loading bays at basement level, and would be therefore have a negligible impact in terms of noise associated with unloading.
705. There is no accepted method to assess or mitigate noise from emergency services sirens, but it is understood that the City Police would only operate sirens when accessing or leaving the proposed Police building (and in the immediate area) when absolutely necessary, in an emergency situation. There are six tests which need to be satisfied for each condition the LPA intends to apply. Conditions must be 1. necessary, 2. relevant to planning, 3. relevant to the development being permitted, 4. enforceable, 5. precise and 6. reasonable in all other aspects. It is considered that restricting the use of sirens by condition would not be necessary or reasonable, because there are guidelines in place for use of sirens, or enforceable as it would not be possible to determine whether the siren should have been used.

### **Health Impact Assessment**

706. Policy HL9 of the Draft City Plan 2036 advises applicants of major developments to assess the potential impacts their development may have on the health and well-being of the City's communities. The applicants have submitted a Health Impact Assessment, based on the Healthy Urban Development Unit's criteria, which demonstrates that health and well-being issues have been adequately addressed.
707. The submitted Health Impact Assessment which has been based on the Healthy Urban Development Unit (HUDU) to develop a comprehensive assessment outlining how the proposed development could impact on health, identifying relevant pathways towards health outcomes drawing on the wider determinants of health. The Assessment concludes that the development would have an overall positive impact on health.
708. Positive impacts include:
  - Provision of new jobs associated with the world class civic site for use by HMCTS, City Police and commercial floorspace, supporting access to local employment, as well as the creation of job opportunities during construction;



- New east-west pedestrian routes would be created between Whitefairs and Primrose Hill, Salisbury Court and Salisbury Square which would improve pedestrian access and permeability to the existing civic space at Salisbury Square and alleviating demand on pedestrian routes;
- Reinstated historic pedestrian routes incorporating the Site into its wider area, facilitating pedestrian access and alleviating demand on existing pedestrian routes;
- Large terraces which will have extensive green planting and which will provide a climate-variable green space for tenants to access;
- Living roofs and green walls, public realm planting designed to incorporate habitats and species enhancement;
- The development is proposed to be car-free (with the exception of the provision disabled parking and operational parking for the police rapid response fleet);
- Provision of long and short stay cycle parking spaces and associated facilities to promote cycling and other active travel options;
- Provision of a cycle 'Hub' to promote cycling and active travel;
- The extended contraflow northbound cycle lane along Dorset Rise will provide a clearer route for cyclists;
- The design buildings considering the context of the Site and maximising benefits including employing systems to reduce energy usage (i.e. seeks to 'Be Green' (Renewable Energy) and includes ground source heat pumps, air-source heat pumps and photovoltaic).

709. Potential negative impacts identified would need to be mitigated during the construction and operational phases, for example by:

- Implementation of a Construction Environmental Management Plan to minimise any environmental effects including dust (via Dust Management), noise and vibration, allowance for 'quiet periods during construction;
- Implementation of a Demolition and Construction Logistics Plan (DCLP) to minimise the environmental and road traffic related impacts of the demolition and construction works;
- Implementation of a Delivery and Servicing Management Plan setting out access, delivery times and booking system; and
- Implementation of a Framework Travel Plan to minimise vehicle trips and to maximise uptake of active travel options (walking and cycling) and of a Cycling Promotion Plan to encourage cycling.

710. Potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions. The development seeks to improve the health and addresses health inequalities, the residual impact would be acceptable, and the proposals would comply with London Plan policy 3.2 and London Plan policy GG3 and emerging

**Sustainability**

Energy and CO2 emissions

711. The Energy Statement accompanying the planning application demonstrates that the new buildings have been designed to achieve an overall 48% reduction in regulated carbon emissions compared with a Building Regulations compliant building. The refurbished listed building would achieve a 63% reduction in regulated carbon emission savings.
712. The proposed energy demand reduction measures include high performing, robust thermal envelopes with optimised glazing ratios for performance and good daylighting. Façades are layered with their depth enabling control of direct sunlight to avoid overheating. The City of London Police Building's structure is designed to allow for clear plan layouts and coupled with an efficient central core offers flexibility of use and potential for future adaption.
713. At this stage, natural ventilation is proposed for the Commercial Building but not proposed for the Court Building and Police Building. This is because the applicant's security consultants have recommended securing the building against potential threats from chemical, biological, radioactive attack, and to maximise privacy due to the sensitive and high-risk nature of their operation. However, the cooling load of the new buildings has been significantly reduced through passive design measures. The individual carbon emissions savings through energy efficient design are 15% for the Court building, 18% for the Police building, 20% for the office building and 19% for the listed building.
714. The applicants are committed to assess opportunities to incorporate natural ventilation into the Office building through the detailed and technical design stages. This will be requested by a pre-commencement condition.
715. There are currently no opportunities to connect the development to an existing or planned district heating network. However, drawings demonstrating how the site is to be future-proofed for a potential connection to a district heating network have been provided.
716. The proposed renewable energy strategy for the site includes:
- A shared basement energy centre for the Court and Police buildings
  - A closed-loop ground source heat pump system (GSHP) providing all space heating and 40% of the cooling demand to the new buildings (approximately 42 boreholes to a depth of 200 m, with 6 m spacing)
  - Air source heat pump systems (ASHP) serving the space heating and cooling of the refurbished building and providing the hot water for the police station building. For the office and court buildings, hot water demands are expected to be smaller and

intermittent, therefore point of use electric water heaters are proposed for these buildings.

- Photovoltaic (PV) arrays on the roofs of the new building (515 sqm of panel area across all 3 new buildings)

717. The carbon emissions savings due to the incorporation of renewable technologies amount to 39% for the Court building, 28% for the Police building, 30% for the Office building and 45% for the refurbished building.
718. This energy strategy demonstrates compliance with the London Plan carbon targets. A condition is recommended requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

#### BREEAM

719. BREEAM (New construction) 2018 pre-assessments for the new buildings and a BREEAM Refurbishment and Fit-out 2014 assessment for the listed building have been carried out, demonstrating that the new buildings and the refurbished listed building can achieve an "Excellent" rating while the retail and cycle hub element in the office building would achieve a "Very good" rating, due to the assessment covering the shell only. The applicant considers an "Excellent" rating to be the highest feasible and viable rating based on the use and complexity of demands especially for the Police and Court buildings.
720. The assessments for the new buildings indicate high scores in the Water category due to the minimising of internal potable water consumption across the site, and in the Materials category. The other two of the City's four priority categories of Energy and Pollution are prevented from highest scores by limitations in the reduction of energy use, avoiding harmful refrigerants due to the use of heat pumps, and in the maximising of flood and surface water management. Further relevant credits may be achieved through the detailed design development.
721. A condition has been included requiring the submission of post-construction BREEAM assessments for each of the individual buildings, demonstrating that the target rating of 'Excellent' as a minimum has been achieved.

#### Circular Economy and Waste

722. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. Emerging City Plan

2036 Policy S16 sets out the City's support for Circular Economy principles.

723. Due to the significant uplift in floorspace and to the space and security requirements of the Court and Police buildings, none of the existing buildings or structures on the sites of the new 3 buildings can be retained.

724. A Pre refurbishment and demolition audit has been carried out in line with the Circular Economy Statement requirements to identify opportunities to reduce, re-use and recycle waste materials, where viable. The key strategy approach to address Circular Economy principles is:

- Design for longevity, adaptability and flexibility, and in addition, fewer changes to the Court and Police building are expected in contrast to commercial buildings
- Partial demolition and partial refurbishment of the listed building at 2-7 Salisbury Court. The east and part of the west elevation will be retained and elements such as the existing iron columns will be salvaged. New elements include a remodelled roof level, a new south elevation, a part new façade to the west elevation and a new interior structure and core.
- Considerable reduction of embodied carbon by using 70% cement replacement for vertical structures and 50% cement replacement for all other concrete elements
- Reclaiming the Portland stone, limestone and marble façades without downcycling the materials. Re-use of the existing granite cladding from Fleetbank House and terrazzo planters for the external landscaping
- Optimising the structural grid and type of system to reduce quantity and weight of materials and increase flexibility and speed of construction
- Maximising pre-fabrication of building elements, such as the unitised façade systems of the Police and Office buildings, pre-cast concrete stairs and ramps, to reduce construction waste
- Reaching aspirational targets for reducing construction waste and diverting demolition, excavation and construction waste from landfill
- Extending the lifetime of the buildings through careful design and specification
- Provision of a 'Disassembly Guide' for the façade and building services plant to provide guidance on which materials, elements or components can be reused, recycled or composted; and how to disassemble the building to minimise wastage and facilitate reuse, recycling or composting
- Preparation of a Sustainable Procurement Plan to provide a framework for the responsible sourcing of the construction products throughout the life of the proposed development as well as a tool to be used by the procurement team

- The submitted Bill of Materials demonstrates a target of 20% recycled content by value across all layers of the new buildings
  - Minimising the quantities of other resources used, such as energy, water and land.
725. A pre-commencement Circular Economy Assessment update and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm full details and achievement of the planning stage intentions have been requested by conditions. These assessments will be expected to demonstrate that the relevant targets set out in the GLA Circular Economy Guidance can be and have been met.

#### Whole Life-Cycle (WLC) carbon emissions

726. Emerging New London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.
727. The site wide Whole Life-Cycle carbon assessment results confirm that the Police Building would have the highest impact of all new buildings, being responsible for 44% of the overall impact, followed by the Court building with 27% and the Office building with 24% of the carbon emissions of the proposed Development. The refurbished building is estimated to contribute approximately 5% of the carbon emissions of the proposed Development. 30% of the Whole Life-Cycle carbon emissions would come from the operation of the building while 70% is attributed to the embodied carbon of the building materials, facilitating works and external works.
728. The key site opportunities and constraints in reducing WLC emissions have been identified in the Circular Economy chapter above. With regard to proposed materials, further potential opportunities have been listed in the WLC assessment that will be pursued in the detailed design stage.
729. Over the proposed building's whole life-cycle ("cradle to grave"), the

embodied carbon emissions calculated at this planning stage demonstrate that the projected carbon emissions of all new buildings would be higher than the Greater London Authority's benchmark emissions target for office buildings. This performance is attributed to:

- the Court and the Police buildings requiring a significant area and volume of basement, extended to include the Office building, that would need large scale excavation and use of large amounts of steel and concrete, impacting on the performance of all 3 new buildings
- The Court and the Police Buildings requiring heavy reinforcement to address security risks, significantly increasing the amount of steel, as well as being designed with a much longer design year life (125 years as opposed to the standard 60 year life) with further increase of embodied carbon emissions through the structural frame design.
- However, the durability of the materials and structure would limit the need for repair and replacement of building elements during the buildings' lifetime. Therefore, the emissions during the 'Use' stage (excluding operational carbon emissions) are significantly reduced.

730. The WLC assessment of the listed building demonstrates that it would meet the GLA benchmark for retail.
731. The overall whole life-cycle carbon of the proposed development over a 60-year study period is made up of 44% for the Police building, 27% for the Court building, 24% of the Office building and 5% for the listed building. The operational carbon accounts for 30% of the whole lifecycle carbon of the development, compared to 70% attributed to the embodied carbon of the building materials, facilitating works and external works.
732. The majority of the embodied carbon emissions from the development can be attributed to the required large quantities of reinforced concrete and structural steel. Since high percentage of cement replacement is already proposed for all new buildings, the applicants propose to investigate the possibilities for sourcing lower carbon reinforcing steel within the UK.
733. The applicants are committed to carry out further assessments during the detailed design stage to lower this impact of embodied carbon as the project progresses and as new technologies/approaches are developed and tested. The intention is to choose specific products accordingly, in particular relating to the superstructure and substructure which would have the most significant impact on embodied carbon emissions.
734. The confirmation of the strategy including further improvements from the detailed design stage, and a confirmation of the post-construction results have been requested by conditions.

- 735. Local Plan Policy DM19.2 promotes Urban Greening and Biodiversity, DM 10.3 (Design of green roofs and walls) and DM 10.3 (Roof gardens and terraces) encourages high quality roof gardens and terraces.
- 736. An ecologist has been appointed at an early design stage to inform the design process. The landscaping scheme has been designed to incorporate habitats and species enhancements to benefit biodiversity in accordance with City of London Biodiversity Action Plan objectives.
- 737. Overall the proposals include the provision of green roofs, green walls, roof top meadow planting, landscape planting and replacement trees of value to invertebrates, nesting provision for several species of birds and roosting provision for bats.
- 738. The Urban Greening Factor (UGF) is calculated at 0.34 using the Local Plan methodology, which exceeds the emerging City Plan's UGF target score of 0.3 as a minimum.
- 739. An assessment of opportunities for intensifying urban greening on site, as well as details of the quality and maintenance of the proposed urban greening measures would be reserved by condition.

#### Flood Risk, Sustainable Urban Drainage and Climate Resilience

- 740. Local Plan 2015 policy CS18 seeks to "reduce the risk of flooding from surface water throughout the City, by ensuring the development proposals minimise water use, reduce demands on the combined surface water sewer and sewerage network". The use of Sustainable Drainage Systems (SuDS) is supported by Local Plan policy CS18 and policy CR3 of the draft City Plan 2036.
- 741. The inclusion of SuDS and rainwater harvesting would reduce the risk of sewer surcharge flooding elsewhere in the City by reducing the speed and quantity of rainwater entering the combined drainage network. This will be especially important as we experience more frequent extreme weather events due to climate change.
- 742. The proposed development incorporates sustainable drainage techniques (SUDS) in accordance with the London Plan hierarchy underground tanks/ cellular crates and rainwater harvesting.
- 743. The Lead Local Flood Authority and Thames Water have raised no objections to the proposals and subject to recommended conditions.
- 744. The proposed Flood Risk and SuDs strategy would accord with policies CS18 of the Local Plan 2015, CR3 of the draft City Plan 2036, policies 5.12 and 5.13 of the London Plan and policies SI12 and 13 of the draft Publication London Plan.
- 745. Overall, this development includes a range of measures which will improve its resilience to climate change. Details of these measures will determine how effectively the building performs in coming decades, and conditions are attached to seek more detailed modelling and planting plans against the UK Climate Projections UKCP18 to 2080.

## Conclusion

746. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing.
747. The proposed development, by way of its central location within London, its opportunities for providing a positive and healthy work/life environment, and its environmental credentials, would positively contribute to the economic, social and environmental sustainability of the City of London. The proposed sustainability strategy overall meets current London Plan policies as well as Local Plan policies. The development is on track to achieve an “Excellent” BREEAM rating. A BREEAM “Outstanding” rating, as well as Whole Life-Cycle Carbon emission results meeting the GLA’s benchmark targets are not considered to be achievable due to the particular constraints and structural requirements of the proposed Court and Police buildings. However, Circular Economy principles can be positively addressed through robust detailing, optimised structural solutions and applying design principles for longevity, adaptability and maximum pre-fabrication in the forthcoming detailed design development. The building would achieve an appropriate degree of climate change mitigation through providing a connection to a potential new or extended renewable heat network while passive energy saving measures and green energy technologies would be employed to significantly reduce carbon emissions. Furthermore, the development would improve the urban greening of the public realm and on the building’s terraces and roofs, while significantly increasing the biodiversity on site that would contribute to improvements of the wider area.

## Fire Statement

748. Policy D12 of the draft Publication London Plan seeks to ensure that proposals have been designed to achieve the highest standards of fire safety, embedding these into developments at the earliest possible stage.
749. The applicant has consulted with the District Surveyors Office in relation to the design, and the London Fire Brigade and the City’s fire safety advisor have given their input. There are no in principal issues with the fire safety measures proposed.

## Equality Impacts

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

750. The City, as a public authority must, in the exercise of its functions,



have due regard to the need to:

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

751. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. It is the view of officers that a decision to grant permission in this case inclusive and accessible design principles have been incorporated to ensure people with a mobility restriction, and any other limiting considerations can use the new facilities with ease. The proposed development will have step-free access to all parts of the buildings, including balconies and roof terrace. There will be wheelchair-accessible sanitary facilities alongside cycling facilities and at all reception areas.
752. As set out in the considerations section of the report the Committee is required to have due regard to its obligations under the Equality Act 2010. An Equalities Impact Assessment has been carried out in respect of the scheme and is appended to this report.
753. It has considered that the physical design and layout of the scheme has been designed to be accessible to all regardless of age, disability, whether you are pregnant, race, sex, sexual orientation and gender reassignment and marital status.
754. This would be achieved through measures such as:
- The provision of level access or step free access and lifts where this cannot be achieved due to building and site constraints. This would include accessible routes through the site and step free access to all parts of each building including balconies and roof terraces;
  - Public resting/seating areas within the Court and Police buildings and the public realm Salisbury Court
  - The commitment to provide accessible parking and public realm improvements
  - The provision of accessible facilities including changing places, toilets (sex specific and gender neutral), a wheelchair store and accessible cycle parking
  - Safe evacuation procedures for people with physical disabilities or impairment
755. Final details of access to the Police building, Court and Commercial building would be secured by condition in order to ensure equality of access.
756. Conditions, informatives and a S278 agreement would be required to cover matters such as the accessible parking, final layout of supporting facilities such as the toilets and access into the Court, Police, Commercial buildings and public house. An informative would be

placed on the permission reminding future occupiers of their duty under the Equality Act 2010. This would be particularly relevant in the instance of the Commercial building where the future occupiers are unknown.

757. The Corporation needs to ensure that dialogue with the neighbours is maintained including St Bride's Church. A suitable programme of highway works and conditions relating to construction and demolition management and logistics are recommended in order to minimise the impact of the scheme on the neighbouring residents and occupiers.

**Assessment of Public benefits and the paragraph 196 NPPF balancing exercise**

758. The NPPF paragraph 187 requires local planning authorities to maintain up to date evidence about the historic environment including assessing the significance of heritage assets and the contribution they make to the environment. The significance of the six non designated heritage which merit consideration in this planning decision have been assessed in this report refer Principle of Demolition Non Designated Heritage Assets. These buildings are of local importance and their heritage values have been clearly identified. The value of this local significance ranges from one asset having high significance (80-81 Fleet Street), four with moderate (Chronicle House 72-78 Fleet Street, 8 Salisbury Court, 35 Whitefriars and 1 Salisbury Court), one with low (36-38 Whitefriars Street) and the alleyways are identified as low. Individually and collectively, these are considered to make a positive contribution to the local townscape and positively contribute to the significance of Fleet Street Conservation Area and are referenced in the Conservation Area SPD.
759. In assessing impacts to non-designated heritage assets paragraph 197 must be taken into consideration "The effect of an application on the significance of a non-designated heritage asset should be considered in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset." In the case of the six non designated heritage assets affected by the proposed development the impacts would be direct and there would be total loss of their significance which ranges from high to low. Considering this significance and extent of demolition, the scale of this harm would be evaluated as having a significant adverse impact. This impact is at a high level and in applying para 197 must be weighed against the merits of the overall proposal to reach a balanced judgment.
760. Paragraph 196 of the NPPF states "where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use". Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF (para 8). Public benefits should

flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. Paragraph 193 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. As the statutory duty imposed by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged, considerable importance and weight must be given to the desirability of preserving the setting of listed buildings, when carrying out the paragraph 196 NPPF balancing exercise. When considering the listed building consent applications, the duty imposed by section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 applies and in considering whether to grant listed building consent special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. As the application site lies within the Fleet Conservation Area, the duty imposed by section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged in relation to that part of the application site which lies within the conservation area. As a result, when carrying out the paragraph 196 NPPF balancing exercise in relation to that part of the application site lying within the conservation area, considerable importance and weight must be given to the desirability of preserving or enhancing the character or appearance of that conservation area.

761. An assessment of the significance of designated heritage assets has also been undertaken including Fleet Street Conservation Area, Waithman Memorial (Grade II), O'Connor Bust and 2-7 Salisbury Court (Grade II) as well as surrounding designated heritage assets where there are more indirect impacts on setting and significance. In this case, less than substantial harm of different degrees has been identified to designated heritage assets and this is summarised below.

- The demolition of six buildings and related three public routes which are non-designated heritage assets all of which are of high to low significance. The redevelopment proposals, in particular the massing and bulk of the Court Building as experienced on Fleet Street, would result in harm to the Fleet Street townscape and Conservation Area. **This would cause a high level of less than substantial harm to the fleet Street Conservation Area.**
- The demolition of Chronicle House 72-78 Fleet Street and 80-81 Fleet Street would have an adverse impact on the setting and significance of listed buildings on Fleet Street (neighbouring or opposite the development site including The Daily Express Office,

Mersey House, The Daily Telegraph Building, 143-144 Fleet Street, Ye Olde Cheshire Cheese Public House, 146 Fleet Street and Reuters Building). **This would cause a minor level less than substantial harm.**

- The height and massing of the proposed development would have an adverse impact on the setting and significance, of St Bride's Church (grade I) and Old Bailey (grade II\*) as experienced from LVMF in viewpoints and as part of the wider setting in identified Protected Views and in local townscape. **This would cause minor level of less than substantial harm.**
- The height and massing of the development would have an adverse impact on the setting and the significance of St Paul's Cathedral as experienced in Fleet Street as part of the Processional Route. Taking into consideration the international importance of this listed building, great weight must be attached to the significance and level of harm. **The impact is identified as a low level of less than substantial harm.**
- The height and massing would also have an impact on the Processional Route which forms part of the setting of St Paul's Cathedral Conservation Area and its contribution to significance. Again, great weight is attached to the significance and **this would cause a slight level of less than substantial harm.**
- The proposed Court Building would dominate the setting of 3-7 Salisbury Court (Grade II) and result in additional demolition and would have an adverse impact on setting. **This would cause a minor level of less than substantial harm.**
- The extent of demolition to 2-7 Salisbury Court which result in a diminishment of significance due to loss of historic fabric. **This would cause a moderate level of less than substantial harm.**

762. In this case, the less than substantial harm ranges from slight to high caused to a number of designated heritage assets and para 196 requires this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use."

763. The key social, environmental and economic public benefits of the proposal are considered to be:

- Creation of a Civic Quarter in the heart of the legal community close to the Central Criminal Court (the Old Bailey), the Royal Courts of Justice, the Middle and Inner Inns of Court, and the Business and Property Courts in the Rolls Building which would reinforce the City's reputation as a global centre for business and finance, with the infrastructure necessary to administer justice

efficiently and uphold the rule of law. **This is a benefit which should be afforded substantial weight.**

- State of the art Court and police station would support the vision to modernise and upgrade the justice system such that it works for everyone, from judges and legal professionals, to witnesses, litigants and the vulnerable victims of crime, doing so through the use of new technology, infrastructure, services, processes and ways-of-working. The current Covid-19 emergency has accelerated certain elements of the reform programme, for example through the significantly increased use of video hearings and created backlog which the proposed Court would alleviate. **This is a benefit which should be afforded substantial weight.**
- Provision of more than 42% of the existing area of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability through the new and improve routes, which are inclusive, comfortable and attractive thereby enhancing and contributing to the City's characteristic network of accessible buildings, streets, courts and alleys. **This is a benefit which should be afforded moderate weight.**
- Delivery of cultural benefits, including a substantial public art scheme, public events and celebration of the heritage of Fleet Street and accessible courts (live and online). **This is a benefit that should be afforded moderate weight.**
- Provision of a public cycle hub including electric bike charging points, which would promote active travel. The hub is an innovative concept, providing a dedicated internal space within the commercial building footprint for use by visitors to the three buildings and to the wider area, and within close proximity to two major cycleways. The area would provide secure cycle parking sheltered from the elements. **This is a benefit that would attract moderate weight.**
- A contribution to the forthcoming Fleet Street and Temple Healthy Streets Plan for a study to assess options to provide access to and from the streets to the south of the site to the Embankment. As the contribution would fund the study only and will not itself deliver any benefits which might later flow from the study, this is a benefit that would attract a limited amount of weight.

764. Despite the overall finding that there would be harm to heritage assets, a number of heritage benefits would also be delivered by the development and these should be considered as public benefits which should be afforded moderate to minor weight. They are as follows:

- Restoring the street elevation and roof of 2-7 Salisbury Court enhancing the primary significance Moderate benefit

- Improved setting public realm on and around the site enhancing the appearance of this part of the Fleet Street Conservation Area and setting of listed buildings particularly the Waithman Obelisk, the Harrow Public House, 85 Fleet Street, Salisbury Square and the setting of Whitefriars Conservation Area. Moderate benefit
- Improved setting and ability to appreciate St Bride's Church spire by the creation of a new public view of the designated heritage assets from the new North Passage in mid distant views Moderate benefit
- Demolition of Fleetbank House and reinstatement of the lost historic street enclosure on Whitefriars Street enhancing the setting of these parts of the Fleet Street and Whitefriars Conservation Areas. Minor benefit

765. When carrying out the Para 196 balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving the building or its setting. When carrying out the balancing exercise in a case where there is harm to the significance of a conservation area, considerable importance and weight should be given to the desirability of preserving or enhancing the character or appearance of the conservation area.

766. This application identifies harm to some of the City's most prized and internationally important designated heritage assets. In this case high levels of less than substantial harm has been identified to Fleet Street Conservation Area. Lower levels of less than substantial harm have also been identified to the setting of St Paul's Cathedral (Grade I) and to St Pauls Conservation Area as well as Old Bailey and St Bride's Church (Grade I). Great weight is attached to the significance of these assets of national importance and to the level of harm. The proposals are contrary to NPPF policies 192 and 193 which seek to attach great weight to the conservation of the significance of designated heritage assets (with greater weight being attached to the conservation of assets of greater importance). Paragraph 193 makes it clear great weight should be attached to the conservation of designated heritage assets irrespective of whether the harm is substantial total loss or less than substantial to its significance. The proposals are also not compliant with the heritage policies in the City of London Plan, the draft City of London Plan, or the London Plan. Such levels of harm require clear and convincing justification and should only be accepted if there is such justification and that the harm would be outweighed by the public benefits which the proposals would secure.

767. Justification in terms of the location and the impacts of not delivering the proposal have been set out in paragraphs relating Economic Issues and Strategic Need for Development and Justification of Proposals. The public benefits are set out above are considered substantial and flow directly from the proposals. The levels of less than substantial

harm and total loss of significance are outweighed by the benefits which this unique development opportunity will deliver. The NPPF heritage policies are an important material consideration and it is considered that the substantial public and heritage benefits of the scheme would outweigh the high levels of less than substantial harm to designated heritage assets as well as the total loss of significance of non-designated heritage assets. This conclusion is reached even when giving great weight to heritage significance as required under statutory duties. It is also reached whether the heritage harm is considered cumulatively or in respect of the harm to each asset (whether designated or not designated).

768. On the basis of the above, the proposal accords with the heritage policies set out in the NPPF and yet, because of the way the policies are framed, does not accord with the development plan policies relating to heritage issues. The central aims of the planning system in achieving sustainable development are achieved by this high quality proposal and by the public benefits that will flow from the scheme. The fact that the development plan policies do not incorporate the heritage balance should not prevent this development. For that reason, it is considered that in this instance other material considerations indicate that the decision should be made otherwise in accordance with the development plan and that the planning permission and listed building consent should be granted for the scheme notwithstanding the acknowledged harm to the significance of heritage assets that will result.

### **Planning Obligations**

#### **CIL and Planning Obligations**

769. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
770. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
771. From 1st April 2019 Mayoral CIL 2 (MCIL2) supersedes the Mayor of London's CIL and associated section 106 planning obligations charging schedule. This change removes the Mayor's planning obligations for Crossrail contributions. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).
772. CIL contributions and City of London Planning obligations are set out below.

## MCIL2

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution</b>	<b>Forwarded to the Mayor</b>	<b>City's charge for administration and monitoring</b>
<b>MCIL2 payable</b>	£1,400,791	£1,344,760	£56,031

## City CIL and Planning Obligations

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
<b>City CIL</b>	£605,555	£575,277	£30,278
<b>City Planning Obligations</b>			
<b>Carbon Reduction Shortfall (<i>as designed</i>)</b>	£1,039,680	£1,039,680	£0
<b>Section 278 Design and Evaluation Fee</b>	£100,000	£100,000	£0
<b>Cycle Hire/Network Contribution</b>	£ tbc	£ tbc	£0
<b>Legible London Contribution</b>	£20,000	£20,000	£0
<b>Monitoring Charge</b>	£1,250	£0	£1,250
<b>Total liability in accordance with the City of London's policies</b>	<b>£1,816,485</b>	<b>£1,784,957</b>	<b>£31,528</b>

## City's Planning Obligations

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

- Highway Reparation and other Highways Obligations including an indemnity in respect of any costs or claims relating to the order to be made under s249 of the Town and Country Planning Act 1990 to extinguish the right to use vehicles within Salisbury Square



- Carbon Offsetting
- Public Routes
- Construction monitoring costs

774. The appropriate mechanism for securing the above planning obligations, and enabling your Committee to give weight to them, requires particular consideration in this case because the applicant (and owner) is the City Corporation and there is currently no other party involved in the development. Ordinarily an Owner is involved who can sign a Section 106 Agreement and give covenants to secure planning obligations. In the majority of previous cases where the City has been the Owner, there has been another interested party who has been able to sign a S.106 Agreement, and the City as freeholder has committed to ensuring all future owners also sign the S.106 Agreement, by the City Surveyor's Department given an undertaking under delegated authority. In this case, there is no other interested party involved in the development so all undertakings and commitments fall to be given by the City itself.
775. The fact that the City would be giving planning obligation covenants under S.106 of the Town and Country Planning Act 1990 gives rise to a technical enforceability issue because the City could not take legal action against itself. In order to give weight to the planning obligations to be provided, the City as local planning authority needs to be satisfied that the required planning obligations would be complied with, notwithstanding the lack of ultimate enforcement powers through the courts.
776. The City Corporation has previously taken advice from Leading Counsel as to how to address planning obligations in this situation and this advice is still considered sound. Leading Counsel advised that an appropriate way of addressing this enforceability issue is for the City as landowner to resolve to comply with the planning obligations in the event that it develops itself (in addition to giving assurances that it will ensure the obligations are binding on any future purchaser or development partner). Additionally, the advice was that a Unilateral Undertaking under S.106 should be signed by the City as landowner, and this will be placed on the Local Land Charges and Planning Registers to provide a public record of the covenants, as is the practice with all S.106 Deeds. It is considered that the dual assurance of a Unilateral Undertaking and express commitment regarding compliance would give your Committee reasonable grounds to give weight to the planning obligations in evaluating this application. The City Surveyor has delegated authority to consent to the City Corporation's land being bound by planning obligations and to make it a condition of any freehold or leasehold disposal, that the freeholder or leaseholder is required to enter into planning obligations on like terms as the planning agreement.
777. An express commitment will be sought from the City Surveyor's prior to the permission being issued and this, coupled with the proposed S.106 undertaking to be signed by the City as landowner, the Comptroller and

City Solicitor advises that it would be reasonable for your Committee to give weight to the proposed planning obligations (on the basis that no reasonable local authority charged with public duties would undermine its credibility and reputation by failing to honour such a commitment). The obligations may therefore properly be taken into account in reaching a recommendation and decision on the acceptability of the proposals.

778. The proposed obligations are necessary to make the application acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy. Your approval is therefore sought for a Unilateral Undertaking being accepted to cover the obligations set out above, together with the payment of the local planning authority's legal and planning administration fees of this Undertaking.

779. In addition to above, the following types of obligations are frequently secured through a S.106 agreement:

- Utility Connections
- Public Lift (Specification & Management Plan)
- Cultural Implementation Strategy
- Public Art
- Relocation of the Waithman Obelisk (Conservation Management Plan)
- A scheme shall be submitted for approval providing for the maintenance, conservation and reinstatement of TP O'Connor bust
- A scheme of highway works necessary to make the development acceptable in planning terms (normally Section 278 works)
- Travel Plan (including Cycling Promotion Plan)
- Utility Connections
- Delivery and Servicing Management Plan (including Consolidation)
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy (Demolition & Construction)

780. Leading Counsel has also advised in the past that some matters which would normally be required by planning obligations may more appropriately be imposed by way of planning conditions in such a situation where the local planning authority are considering their own application. In this case officers have reviewed the full list of planning obligations which would normally be required and in this case and are proposing that the above be dealt with by conditions in this instance. As negotiations on the form of the undertaking will continue after any resolution to grant planning permission, I request that I be given delegated authority to continue to negotiate and agree the terms of the

obligations and to make minor changes in the event that changes are needed to vary or add conditions or informatives to those proposed, or to move conditions into obligations or vice versa, provided always that officers do not exceed the substantive nature of the Committees decision.

781. The scope of the scheme of highway works may include, but is not limited to, improving crossings and the surrounding footway/carriageway to accommodate increased pedestrian and cyclist movements and the planting of street trees.
782. The City's interest as landowner is relevant to the issue of the enforceability of planning obligations and it is also relevant to:
- a. Regulation 10 of the Town and Country Planning Regulations 1992 (which prevents a committee from determining an application if that committee is also responsible for the management of any land to which the application relates); and
  - b. Regulation 64(2) of the Environmental Impact Assessment Regulations 2017 which provides that where a local authority is bringing forward a proposal it must make appropriate administrative arrangements to ensure functional separation between persons bringing forward the proposals and the persons responsible for determining it.
783. Members will be aware that steps have been taken to ensure compliance with these regulations, including the publication of a handling note in respect of this application and the establishment of the Sub-committee to consider the application. In all other respects the City's interest as landowner to be disregarded as irrelevant as it is not a material planning consideration.

#### Further Contribution

784. The City Corporation as applicant have confirmed that in connection with the development they will provide a contribution towards the forthcoming Fleet Street and Temple Healthy Streets Plan for a study to assess options to provide access to and from the streets to the south of the site to the Embankment. It is proposed to include this as part of the unilateral undertaking discussed in the section above.
785. Regulation 122 of the Community Infrastructure Levy Regulations 2010 provides that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is (i) necessary to make the development acceptable in planning terms (ii) directly related to the development; and (iii) fairly and reasonably related in scale and kind to the development. The transport impacts of the development are discussed above and have been determined to be acceptable without this contribution being provided. As such the contribution does not meet the statutory test of being necessary to make the development acceptable in planning terms and members are advised that the provision of this contribution should not constitute a

reason for granting planning permission for the development.

786. The contribution will however help to fund a study that will explore the options for providing access to and from the streets to the south of the site to the Embankment and if such a route was possible it would benefit the development by providing alternative and additional routes for rapid response vehicles and custody vehicles to access the highway network which would serve to increase the resilience of the operations of the two buildings. However, the benefit of study would also be wider as it would inform the wider healthy streets plan. If such a route were feasible it would also offer a wider benefit beyond just benefitting the development. This would still be the case if the route were to be opened for access only because this would reduce through traffic and improve the streets for those walking and cycling in the area, as well providing for those who require access by motor vehicle. As such whilst the contribution cannot constitute a reason for granting planning permission pursuant to Regulation 122, the contribution is considered relevant to planning and to the development, and regard can be had to it. The contribution can be taken into account by the committee in the planning balance and as a public benefit to be weighed against the harm caused to heritage assets when considering the balancing exercise under paragraph 196 of the NPPF. This is addressed further above in the section on the Assessment of Public Benefits and the paragraph 196 NPPF balancing exercise.

#### Monitoring and Administrative Costs

787. The City Corporation as applicant will pay the City of London as Local Planning Authorities' legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the undertaking and strategies.

#### Human Rights Act 1998

788. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR")).
789. Insofar as the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate. It is not considered that the proposal would result in an unacceptable impact on the existing use of the properties. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. It is considered that the public benefits of the scheme, including the provision of Courts; police station and significantly improved and increased public realm would reinforce the legal cluster as identified in the London Plan and accord with the

objectives of the Fleet Street and Ludgate Key Area of Change in the Draft City Plan 2036, outweighs the Minor Adverse impact and that such impact is necessary in the interests of the economic well-being of the country and is proportionate.

790. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising though impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

#### **Conclusion on Planning Permission 20/00997/FULEIA**

791. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, and the emerging Local Plan and considering all other material considerations.
792. The scheme would create of a Civic Quarter in the heart of the legal community close to the Central Criminal Court (the Old Bailey), the Royal Courts of Justice, the Middle and Inner Inns of Court, and the Business and Property Courts in the Rolls Building which would reinforce the City's reputation as a global centre for business and finance, with the infrastructure necessary to administer justice efficiently and uphold the rule of law. This is a benefit which should be afforded substantial weight.
793. The proposed state of the art Court and police station would support the vision to modernise and upgrade the justice system such that it works for everyone, from judges and legal professionals, to witnesses, litigants and the vulnerable victims of crime, doing so through the use of new technology, infrastructure, services, processes and ways-of-working. The current Covid-19 emergency has accelerated certain elements of the reform programme, for example through the significantly increased use of video hearings and created backlog which the proposed Court would alleviate. This is a benefit which should be afforded substantial weight.
794. The new police building would provide headquarters for the lead force for economic and cybercrime, the combined court and City of London police operational efficiencies and improvements are expected to flow from co-location. Strategic Policy S22 Fleet Street and Ludgate seeks to promote new court facilities and a City of London Police Station recognising the area is an established legal cluster, focused on the Temples in the City and the Royal Courts of Justice within the City of Westminster. The area is identified in the London Plan as a CAZ Legal Cluster.
795. The scheme delivers a high quality, commercial building, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses. Strategic Policy CS1 of the City of London Local Plan 2015, emerging Policy S4 and policy 4.2 of the London Plan seeks to ensure that there

is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers.

- 796. The buildings would be designed to high sustainability standards, incorporating climate resilience, targeting BREEAM “Excellent” rating as the highest feasible and viable rating based on the use and complexity of demands especially for the Police and Court buildings, commercial building, listed building and adopting Circular Economy principles.
- 797. Dedicated areas of planting and greening would be incorporated into the development through a combination urban greening of the public realm and on all the buildings terraces; green roofs and walls; and tree planting significantly increasing the biodiversity on site that would contribute to improvements of the wider area.
- 798. The scheme delivers significant public realm enhancements, including an extended new amenity space in Salisbury Square; generously proportioned accessible new east-west public routes through the site, connecting Whitefriars with Salisbury Court with approximately 100% increase of dedicated public realm across the development. Salisbury Square would increase in size by 42%.
- 799. The increase in floorspace and occupation of the development places extra pressure on the comfort and safety of the City’s streets. The overall width of the routes permeating through site and provision of additional public space would increase their capacity and improve pedestrian comfort levels. Overall, the pedestrian experience around the site is expected to improve as a result of the proposals, notwithstanding the introduction of the two pinch points due to the proposed security measures on Fleet Street.
- 800. The proposal would deliver a new Court, Police Building and commercial buildings in identified legal quarter in accordance Draft City Plan 2036 Strategic Policy S22 Fleet Street and Ludgate seeks to promote new court facilities and a City of London Police Station recognising the area is an established legal cluster, focused on the Temples in the City and the Royal Courts of Justice within the City of Westminster. The area is identified in the London Plan as a CAZ Legal Cluster. Policy SD4 of the London Plan seeks to protect and enhance the strategic functions of the CAZ, including the legal functions of the quarter.
- 801. The loss of the public house in Whitefriars Street is contrary to Policy HC7 of the London Plan. The adaptation of the existing listed building at 2-7 Salisbury Square to form the new public house will ensure that a character public house unit will be reprovisioned as part of the scheme. The new public house would significantly increase the total floor space in public house use and have enhanced accessibility directly off Salisbury Square. This is considered to be an improvement on the existing provision and when balanced against the loss of the existing public house it is considered to outweigh the policy non-compliance.

802. The proposals conflict with policies which seek to prevent the loss of retail floorspace in the Principal Shopping Centre.
803. The proposals conflict with policies which seek to prevent the loss of medical uses.
804. The resulting loss in office floorspace is in breach of policies CS1 and DM1.1 of the Local Plan.
805. The proposal has been assessed in accordance with other relevant SPGs, SPDs and guidance notes listed in the report.
806. The scheme benefits from high levels of public transport accessibility, would be car-free (other than disabled parking spaces and parking for operational vehicles) and would promote cycling and walking as healthy modes of travel. The provision of a cycle hub is welcome as an innovative way to meet short stay cycle parking requirements while maintaining a high-quality public realm.
807. There are a small number of major and moderate adverse impacts, in terms of loss of daylight and sunlight, on flats at 142 Fleet Street and 143-144 Fleet Street. Where there are moderate or major adverse impacts, retained levels of VSC are appropriate to the local context. As such the extent of harm is not considered to be such that it would conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. When considered against the wider benefits of the scheme, including the substantial improvements to Salisbury Square and sunlight to the square, these impacts are considered to be acceptable.
808. Negative impacts during construction would be controlled as far as possible by the implementation of a robust Construction Environmental Management Plan and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions would minimise any adverse impacts.
809. Objections have been received from statutory consultees and third parties, relating to the design of the development; its impact on designated and non-designated heritage assets; the impact on the environment and amenity of the immediately surrounding area and buildings; the impact on the highway network; and the impact on the future development of neighbouring site, specifically 8 Salisbury Square. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and the Unilateral Undertaking.
810. It is considered that the proposal would preserve the special architectural and historic interest and heritage significance of the Harrow Public House, Whitefriars street (Grade II listed), The Punch Tavern and Offices over 98-100 Fleet street (Grade II listed), The Old Bell Public House 96 Fleet Street (Grade II), Bartholomew House 90-94 Fleet Street (Grade II listed), the Reuters and Press Association Headquarter and 9 Salisbury Court (Grade II listed), 56-57 Fleet street Former Glasgow Herald Office (Grade II listed), Tipperary Public

House, 66 Fleet street (Grade II listed), Northcliffe House, Tudor Street (Grade II listed), 24 Tudor street (Grade II listed), 9 Carmelite Street (Grade II listed), Carmelite House, 8 Carmelite Street (Grade II Listed), Former Guildhall School of Music John Carpenter Street (Grade II Listed), Sion College (Grade II) , Telephone House (Grade II) , Hamilton House (Grade II) City of London School (Grade II), Unilever House (Grade II), The Daily Express Offices 120 -129 Fleet Street (Grade II\*), Mersey House 132-134 Fleet Street (Grade II), The Daily Telegraph Building 135-141 Fleet Street (Grade II Listed), 143- 144 Fleet Street (Grade II Listed), 145 Fleet Street Ye Old Cheshire Cheese Public House (Grade II Listed), 146 Fleet Street (Grade II Listed) and 1-3 Wine Office Court (Grade II Listed), St Dunstan's in the West Fleet Street (Grade I Listed); numbers 2,3,4,5 and 6 Kings Bench Walk (Grade I listed) and 3 North Kings Bench Walk (Grade II\* listed), Barbican Towers (Grade II Listed).

811. It is also considered that the proposals would preserve the significance and setting of the Whitefriars Conservation Area and Temples Conservation Area and slightly enhance the setting of Whitefriars Conservation Area.
812. It is considered that the proposal would result in the total loss of heritage significance of six buildings deemed to be non-designated heritage assets. This would result from the demolition of Chronicle House (72-78 Fleet Street), 80-81 Fleet Street, 8 Salisbury Court, 1 Salisbury Square, numbers 35 and 36-38 Whitefriars Street. The loss of the altered remains of Hood Court, Hanging Sword Alley and through route of Primrose Hill would also result in the total loss of significance of these historic fragments of urban structure considered non-designated heritage assets.
813. The proposal would result in less than substantial harm to the Fleet Street Conservation Area, at the upper end of the spectrum. This significant level of harm would result from the demolition and total loss of significance of those six buildings which are non-designated heritage assets, and which make modest to high contributions to the character and appearance and heritage significance of the Fleet Street Conservation Area, as a whole. The total loss of the altered and fragmentary remains of Hood Court and Hanging Sword Alley would result in the loss of these non-designated heritage assets, and their more modest contribution to the Fleet Street Conservation Area would be lost. Their respective individual local significance and intrinsic architectural, historic and artistic values, and the contribution these make to those of the Conservation Area, would be lost. Beyond this level of identified harm, it is considered that the siting, disposition/layout, form, bulk, massing and architectural expression of the new build proposals preserve its character, appearance and heritage significance.
814. The proposed development would erode the positive contribution setting makes to the significance of St Pauls Cathedral Conservation Area due to the harm to the processional route which is central to the



designated heritage assets setting and significance. In attaching great weight to the harm and the significance of the designated heritage this is evaluated at the lower end of less than substantial and is considered to be slight.

815. St Pauls Cathedral is an iconic building of international importance and its historic, architectural and evidential values are of the uppermost significance and therefore great weight must be attached to this significance in evaluating any impacts. The impact in this case is experienced from a single location and on a transient basis as the proposed development momentarily obscures part of the dome and lantern on approach around the Fetter Lane and Fleet Street junction. This impact is considered harmful and the special architectural and historic interest and heritage significance of St Paul's Cathedral would not be preserved. Attaching great weight to the iconic heritage status and values of significance the impact is evaluated as less than substantial. Due to the momentary nature of the harm and the quality of the baseline view of the listed building which is not pristine the level of less than substantial harm is considered to be low.
816. The proposals would fail to preserve the setting and would result in some minor less than substantial harm, at the lower end of the spectrum, to the special interest and heritage significance of St Bride's Church, as the result of a slight diminishment in its local and wider riparian townscape presence, in particular in important views of civic/historical resonance. There would also be a minor enhancement to its significance as a result of a proposed new vista to the rear of the proposed Courts Building.
817. The proposals would fail to preserve the setting and would result in some minor less than substantial harm, at the very lower end of the spectrum, to the special interest and heritage significance of the Old Bailey, as a result of a slight diminishment of its tower silhouette in wider important riparian views.
818. The development would preserve the existing setting of St Paul's as the Strategically Important Landmark. In LVMF 15 B.1, 15 B.2 and 17 B.1 and 17 B.2 the baseline proposals would result in a slight concealment of St Brides and Old Bailey contrary to Policies HC 4 (A). Otherwise the proposal would preserve the setting of St Paul's as the Strategically Important Landmark, other identified landmark elements and the juxtaposition between them would be preserved and there be would no harm to the characteristics or composition of the view in accordance with Policies HC 4, CS 13 and the associated LVMF SPG guidance. The baseline proposals would not be fully compliant with Local Plan Policy CS 13(1), draft City Plan 2036 Policy S13 and London Plan 2021 policy HC4 and guidance contained in the LMVF SPG.
819. In LVMF 11A.1 and 12A.1 in baseline and cumulative scenarios would result in a slight concealment of St Brides Church contrary to Policies HC 4 (A). Otherwise the proposal would preserve the setting of St Paul's as the Strategically Important Landmark, other identified

landmark elements and the juxtaposition between them would be preserved and there would be no harm to the characteristics or composition of the view in accordance with Policies HC 4, CS 13 and the associated LVMF SPG guidance. The baseline and cumulative proposals would not be fully compliant with Local Plan Policy CS 13(1), draft City Plan 2036 Policy S13 and London Plan 2021 policy HC4 and guidance contained in the LVMF SPG.

820. An objection has been received from neighbouring commercial occupiers at 8 Salisbury Square relating to the development potentially prejudicing future development of their property affecting daylight and on the grounds of impacts of servicing and disabled access to their premises. Officers do not consider the proposed development would cause a detrimental impact such that it would alter the ability to access and service the building and no evidence has been provided to indicate future development would be materially affected.
821. It is almost always the case that where major development proposals come forward in the City there is at least some degree of non-compliance with planning policies. In arriving at a decision it is necessary to have regard to all the policies in the development plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it. The heritage policies in the London Plan (in particular HC1) and in the Local Plan (in particular CS12) do not incorporate a balancing exercise as found in paragraph 196 of the NPPF. As a result, if a proposal results in any harm to the significance of a heritage asset it will result in conflict with the heritage policies. The application proposals conflict with London Plan policy HC1 and with Local Plan policies CS12, and DM12.1. Whilst in this case, the proposals are in compliance with a number of policies, conflict has also been identified with a number of other development plan policies as outlined above in this conclusion. It is the view of officers that taken as whole the proposal does not comply with the development plan.
822. The LPA must determine the application in accordance with the development plan unless other material considerations indicate otherwise. It is for the LPA to weigh the other material considerations and decide whether those that support the development outweigh the priority statute has given to the development plan, and the other material considerations which do not support the proposal. Other material considerations are set out below.
823. Paragraph 8 of the NPPF sets out that there is a presumption in favour of sustainable development.
824. As set out in paragraph 193 of the NPPF, great weight should be given to the designated heritage asset's conservation, and at paragraph 194, that any harm should require clear and convincing justification. The weight to be given to a designated heritage assets conservation should increase with its importance.
825. The NPPF, paragraph 196, requires that harm be balanced against the

public benefits. The paragraph 196 NPPF balancing exercise is also to be applied when considering the harm to non-designated heritage assets, designated heritage assets and impacts on the Fleet Conservation Area and processional routes within St Paul's Conservation Area. That balancing exercise is set out in the body of this report. It is the view of officers that giving great weight to the conservation of heritage assets, and considerable importance and weight to the desirability of preserving the setting of listed buildings and to the desirability of preserving or enhancing the character or appearance of the conservation areas, the identified harm to the significance of the designated heritage assets is outweighed by the public interest benefits associated with the proposed development. That is the case whether harm to the significance of the designated heritage assets affected is considered cumulatively or on an asset by asset basis.

- 826. Officers also consider that applying paragraph 197 in respect of harm to the significance of the non-designated heritage assets the harm to their significance is outweighed by the public interest benefits associated with the proposed development. That is the case whether the harm to the significance of the non-designated heritage asset is considered cumulatively or on an asset by asset basis.
- 827. This means that notwithstanding the conflict with the heritage policies within the development plan, the NPPF would not support the refusal of this application for planning permission on heritage grounds.
- 828. The proposal has been assessed in accordance with other relevant SPGs, SPDs and guidance notes listed in the report.
- 829. In addition to the significant benefits that the new Courts and Police station would provide (as identified above) the proposal will deliver a number of other public benefits (including heritage benefits) as set out in the body of this report.
- 830. Taking all material matters into consideration, officers are of the view that the material considerations which weigh in favour of the grant of planning permission outweigh the identified conflict with the development plan the and other material considerations which weigh against the grant of planning permission.
- 831. As such, applying the approach in NPPF paragraph 11(c) the proposed development represents sustainable development. Further, applying the approach in section 38(6) of the Planning and Compulsory Purchase Act 2004, Officers recommend that planning permission should be granted for the proposed development subject to all the relevant conditions being applied and a commitment being given by the City Corporation as landowner along with Unilateral Undertaking being signed into in order to secure the public benefits and minimise the impact of the proposal.

#### **Conclusion on Listed Building Consent 20/00998/LBC 2-7 Salisbury Court**

- 832. The proposal would result in some less than substantial harm, at the

lower end of the spectrum, failing to preserve the special architectural and historic interest and heritage significance of the listed building. This harm would result from the loss and alteration of historic fabric of interest. Otherwise the substantive remodelling and scholarly restoration new build element would preserve special interest and heritage significance, subject to detail reserved for condition.

833. Overall, the proposal would conflict with Local Plan Policies CS 12, DM 12.1 and DM 12.3, draft City Plan 2036 policies S11 and HE1, London Plan Policy 7.8 and draft Publication London Plan Policy HC 1 and Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
834. When addressing the balancing exercise, this harm has been afforded considerable importance and weight, and account taken of the importance of those heritage assets as grade II and II\* listed buildings in accordance with the advice given in paragraph 193 of the NPPF that great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).
835. It is the view of Officers that giving great weight to the conservation of this heritage asset, and considerable importance and weight to the desirability of preserving the special architectural and historic interest and heritage significance of the listed building, the identified harm to the significance of the designated heritage assets is outweighed by the public interest benefits associated with the propose development.
836. Accordingly, Officers recommend that Listed Building Consent should be granted subject to conditions.

**Conclusion on Listed Building Consent 20/00996/LBC – Waithman Memorial, Salisbury Square**

837. The proposal, subject to detail reserved for condition, would preserve and enhance the special architectural and historic interest and heritage significance of the Memorial, enhancing the contribution made by setting as a result of its new siting. The proposals would be in accordance with Local Plan Policies CS 12, DM 12.1 and DM 12.3, draft City Plan 2036 policies S11 and HE1, London Plan Policy 7.8 and draft Publication London Plan Policy HC 1 and Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
838. Accordingly, Officers recommend that Listed Building Consent should be granted subject to conditions.

## **Background Papers**

### Application Documents

Statement of Community Involvement, City of London Corporation, 11 December 2020  
Cover Letter, Gerald Eve LLP, 16 December 2020  
Town Planning Statement, Gerald Eve LLP, 16 December 2020  
Design and Access Statement, Eric Parry Architects, 16 December 2020  
Strategic Case, City of London Corporation, 16 December 2020  
Public Benefits Statement, Gerald Eve LLP, 16 December 2020  
Heritage Statement, Donald Insall Associates, 16 December 2020  
Energy Report, AECOM, 16 December 2020  
Whole Life Carbon Assessment, AECOM, 16 December 2020  
Sustainability Report, AECOM, 16 December 2020  
Circular Economy Statement, AECOM, 16 December 2020  
Health Impact Assessment, BuroHappold, 16 December 2020  
Economic Benefits Statement, BuroHappold, 16 December 2020  
Ecology Statement, BuroHappold, 16 December 2020  
Tree Survey and Arboricultural Assessment, Bartlett Tree Experts, 16 December 2020  
Fire Statement, AECOM, 16 December 2020  
Structural Method Statement for the Obelisk, PAYE, 16 December 2020  
Structural Method Statement for 2-7 Salisbury Court, BuroHappold, 16 December 2020  
Environmental Statement Non-Technical Summary, BuroHappold, 16 December 2020  
Environmental Statement – Volume 1, BuroHappold, 16 December 2020  
Environmental Statement – Volume 2, BuroHappold, 16 December 2020  
Environmental Statement – Volume 3, Tavernor Consultancy and Miller Hare, 16 December 2020  
Environmental Statement – Volume 4, BuroHappold, 16 December 2020  
Circular Economy Individual Building Summary, AECOM, 02 February 2021  
Consultation Response: Historic England, Donald Insall Associates, 12 February 2021  
Technical “Dangerous” Wind Conditions – Clarification, AECOM, 02 March 2021  
Consultation Response: Victorian Society, Donald Insall Associates, 04 March 2021  
Letter, Gerald Eve LLP, 08 March 2021  
Design and Access Statement Addendum, Eric Parry Architects, 09 March 2021  
Environmental Statement Addendum, BuroHappold, 09 March 2021  
Letter, Gerald Eve LLP, 09 March 2021  
Daylight and Sunlight Clarifications, Delva Patman Redler, 10 March 2021  
File Note, Eric Parry Architects, 10 March 2021  
Email, Gerald Eve LLP, 16 March 2021  
Whole Life Cycle Carbon Assessment Appendix C1 Court, Gerald Eve LLP, 16 March 2021

Whole Life Cycle Carbon Assessment Appendix C2 Police, Gerald Eve LLP, 16 March 2021  
Whole Life Cycle Carbon Assessment Appendix C3 Commercial, Gerald Eve LLP, 16 March 2021  
Whole Life Cycle Carbon Assessment Appendix C4 Listed, Gerald Eve LLP, 16 March 2021  
Cultural Plan, Eric Parry Architects, 16 March 2021  
Equality Impact Assessment, BuroHappold, 19 March 2021  
Letter, Gerald Eve LLP, 08 April 2021

### Comments

Memo, Environmental Health Officer, 19 January 2021  
Memo, Air Quality Officer, 20 January 2021  
Email, NATS Safeguarding, 20 January 2021  
Email, Heathrow Safeguarding, 22 January 2021  
Letter, WSP on behalf of the owners of 8 Salisbury Square, 22 January 2021  
Letter, St Bride's Church, 22 January 2021  
Letter, London City Airport, 25 January 2021  
Letter, Natural England, 26 January 2021  
Letter, Environment Agency, 26 January 2021  
Letter, City of Westminster, 28 January 2021  
Letter, The Twentieth Century Society, 29 January 2021  
Email, Thames Water, 29 January 2021  
Memo, Lead Local Flood Authority, 01 February 2021  
Email, Inner Temple, 02 February 2021  
Letter, The Victorian Society, 02 February 2021  
Letter, Historic England, 05 February 2021  
Memo, Conservation Area Advisory Committee, 09 February 2021  
Email, Dan Langan, 16 February 2021  
Email, Open Spaces Department, 16 February 2021  
Letter, WSP, 17 February 2021  
Letter, Graham Packham CC, 19 February 2021  
Email, Centre for the Protection of National Infrastructure, 23 February 2021  
Email, Thames Water, 26 February 2021  
Memo, London Borough of Southwark, 02 March 2021  
Report, Greater London Authority, 03 March 2021  
Memo, Greater London Authority, 03 March 2021  
Email, Kathryn Stubbs, 10 March 2021  
Memo, Greater London Authority, 11 March 2021  
Letter, Save Britain's Heritage, 16 March 2021  
Email, Heathrow Safeguarding, 17 March 2021  
Email, NATS Safeguarding, 18 March 2021  
Email, Environment Agency, 19 March 2021  
Email, District Surveyor's Office, 19 March 2021  
Memo, Access Team, 22 March 2021  
Online Comment (Support), Rachael Smith, 22 March 2021  
Letter, Greater London Authority, 29 March 2021  
Email, Natural England, 29 March 2021  
Email, Alison Lee, 29 March 2021

Letter, London City Airport, 30 March 2021  
Letter, Thames Water, 30 March 2021  
Email, Network Rail, 31 March 2021  
Email, Cleansing Division, 31 March 2021

Handling Note

Salisbury Square Development Handling Note, 23rd March 2021

## **Appendix A**

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

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

As required by the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of that report. The conclusions have been integrated into the decision as to whether planning permission should be granted. An objection received states that it be recognised within all noise and vibration assessments that Receptor E (the objector) is also a place of residence. Any assessment of the impacts of noise and vibration to that Receptor should be reassessed within the Environmental Statement should its sensitivity to noise and vibration be altered given its categorisation for occupation by 'Residents' in addition to its 'Users'.

The applicants and the City agreed the scope of the EIA prior to its submission. The ES provides details of the EIA methodology, the existing site, alternatives and design evolution, the proposed development, socio-economics, health, highways & transport, noise & vibration, air quality, wind microclimate, daylight/sunlight, overshadowing, light pollution & solar glare, townscape, built heritage & visual, climate change, greenhouse gas emissions, waste and cumulative effects. The applicant submitted an ES Addendum under Regulation 25 of the EIA Regulations which addressed the proposed amendments contained within the submission and sets out additional assessment of traffic and transport, wind microclimate effects including thermal comfort and noted in respect of noise that St Bride's Church (Receptor E), was assessed both as a place of worship and as a place of residence. It is considered that the likely significant effects of the proposed development on the environment are as described in the ES and ES Addendum and further and other information, and as, where relevant, referred to in the report.

Should planning permission be granted a scheme for protecting nearby residents (Receptors) and commercial occupiers from noise, dust and other environmental effects of the proposed development would be required.

Conditions are recommended that requires the development to be implemented only in accordance with Demolition and Construction Environmental Management Plans thereby approved.

The local planning authority is satisfied that the environmental statement and addendum correctly identifies the Sensitive Receptors and assesses the effects of the proposed development on the environment.



### Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the Construction Environmental Management Plan, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan and a Cycling Promotion Plan.

These, as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the unilateral undertaking, recommended conditions and the scheme of highway works. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant undertaking or in conditions.

## **APPENDIX B**

### **Relevant London Plan Policies**

Policy GG1 (Building strong and inclusive communities) encourages early and inclusive engagement with stakeholders, including local communities, in the development of proposals, seeking to ensure positive changes to the physical environment and provide access to good quality community spaces, services, amenities and infrastructure. In addition, it supports London continuing to generate a wide range of economic and other opportunities promoting fairness, inclusivity and equality.

Policy GG2 (Making the best use of land) supports the prioritisation of well-connected sites for development including intensifying the use of land to support, amongst other things, workspaces, and promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

Policy GG3 (Creating a healthy city) seeks to *"ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold"* and to *"promote more active and healthy lives for all Londoners and enable them to make healthy choices."*

Policy GGS (Growing a good economy) recognises the strategic aim to *"promote the strength and potential of the wider city region"*, including the support and promotion of *"sufficient employment and industrial space in the right locations to support economic development and regeneration."*

Policy SD4 (The Central Activities Zone (CAZ)) states that *"the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values"*

Policy SD5 (Offices, other strategic functions and residential development in the CAZ) states that *"offices and other CAZ strategic functions are to be given greater weight relative to new residential development."*

Policy D4 states that *"design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan."*

Policy D5 (Inclusive Design) seeks to achieve the highest standard of accessible and inclusive design across new developments.

Policy D8 (Public Realm) establishes criteria for proposals which include public realm space. These criteria include making public realm "well-designed, safe, accessible, *inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable.* Lighting, *including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution.*"

Policy D11 (Safety, security and resilience to emergency) states that "*development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards. Development should include measures to design out crime that - in proportion to the risk - deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.*"

Policy D12 (Fire Safety) encourages proposals to achieve the highest standards of fire safety and ensure that they: "*1) identify suitably positioned unobstructed outside space for fire appliances to be positioned on and which is appropriate for use as an evacuation assembly point; 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire.*"

Policy D14 (Noise) seeks to avoid significant adverse noise impacts on health and quality of life, and mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development.

Policy S1 (Developing London's social infrastructure) states that development proposals should provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies. New facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.

Policy E1 (Offices) explicitly supports increases in the current office stock, noting that *"improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development."*

Policy E2 (Providing suitable business space) states that Boroughs should seek to *"support the provision, and where appropriate, protection of a range of B Use Class business space, in terms of type, use and size, at an appropriate range of rents, to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand."* The policy also states that *"development proposals for new B Use Class business floorspace greater than 2,500 sqm (gross external area), or a locally determined lower threshold in a local Development Plan Document, should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises."*

Policy E3 (Affordable workspace) outlines the requirement for affordable workspace. It is noted that leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with submarket rents

Policy E9 (Retail, markets and hot food takeaways) states that development proposals should enhance local and neighbourhood shopping facilities and prevent the loss of retail. Proposals should also bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres.

Policy HC1 (Heritage conservation and growth) requires development proposals "should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings."

Policy HC2 (World Heritage Sites) requires that "development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, 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 Outstanding Universal Value, or the authenticity and integrity of their attributes." The policy also states that "development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the

Heritage Impact Assessment."

Policy HC3 (Strategic and Local Views) states that development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.

Policy HC4 (London View Management Framework) states that "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 in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places."

Policy G1 (Green infrastructure) states that "development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network."

Policy G4 (Open space) identifies that "development proposals should 1) not result in the loss of protected open space; 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency."

Policy GS (Urban greening) states that "major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage."

Policy G6 (Biodiversity and access to nature) states that "development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process."

Policy SI1 (Improving air quality) states that "development proposals should not: a) lead to further deterioration of existing poor air quality; b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; c) create unacceptable risk of high levels of exposure to poor air quality."

Policy SI2 (Minimising greenhouse gas emissions) requires that all new major development should be net zero-carbon. Major development proposals should also include a detailed energy

strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

Policy SI3 (Energy infrastructure) states that "development proposals should: 1) identify the need for, and suitable sites for, any necessary energy infrastructure requirements including energy centres, energy storage and upgrades to existing infrastructure; 2) identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter-connecting existing networks as well as establishing new networks."

Policy SI4 (Managing heat risk) identifies that "development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure." The policy also states that "major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems."

Policy SI7 (Reducing waste and supporting the circular economy) identifies that "referable applications should promote circular economy outcomes and aim to be net zero-waste."

Policy SI13 (Sustainable drainage) states that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features.

Policy SI12 (Flood risk management) requires development proposals to "ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses."

Policy SI13 (Sustainable drainage) states that "development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible."

Policy TI (Strategic approach to transport) highlights that development "should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated." Development that promotes walking through improved public realm is also supported.

Policy T2 (Healthy streets) encourages development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Proposals should "1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance; 2) reduce the dominance of vehicles on

London's streets whether stationary or moving; 3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport."

Policy T3 (Transport capacity, connectivity and safeguarding) states that "development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed."

Policy T4 (Assessing and mitigating transport impacts) notes that "where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified."

Policy TS (Cycling) supports increases in cycling across London through the provision of secure, integrated, convenient and accessible cycle parking facilities as well as associated changing and facilities and showers.

Policy T6 (Car parking) sets out parking standards which need to be complied with and that "car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport."

Policy T7 (Deliveries, servicing and construction) states that "development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments."

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

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Design and Construction (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016).
- Mayor's Transport Strategy (2018)

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

S1 Healthy and inclusive city

HL1 Inclusive buildings and spaces

HL2 Air quality

HL3 Noise and light pollution

HL4 Contaminated land and water quality

HL6 Public toilets

Policy HL9 Health Impact Assessments

S2 Safe and Secure City

S22 Fleet Street and Ludgate Key Area of Change

SA1 Crowded Places

SA3 Designing in security

HS3 Residential environment

S4 Offices

OF1 Office development

S5 Retailing

RE2 Retail links

S6 Culture, Visitors and the Night -time Economy

CV2 Provision of Visitor Facilities

CV5 Public Art



S7 Smart Infrastructure and Utilities  
S8 Design  
DE1 Sustainability requirements  
DE2 New development  
DE3 Public realm  
DE5 Terraces and viewing galleries  
DE6 Shopfronts  
DE8 Daylight and sunlight  
DE9 Lighting  
S9 Vehicular transport and servicing  
VT1 The impacts of development on transport  
VT2 Freight and servicing  
Policy VT3 Vehicle Parking  
S10 Active travel and healthy streets  
AT1 Pedestrian movement  
AT2 Active travel including cycling  
AT3 Cycle parking  
S11 Historic environment  
HE1 Managing change to heritage assets  
HE2 Ancient monuments and archaeology  
HE3 Setting of the Tower of London World Heritage Site  
S13 Protected Views  
S14 Open spaces and green infrastructure  
OS1 Protection and Provision of Open Spaces  
OS2 City greening  
OS3 Biodiversity  
OS4 Trees  
S15 Climate resilience and flood risk  
CR1 Overheating and Urban Heat Island effect  
CR3 Sustainable drainage systems (SuDS)  
S16 Circular economy and waste  
CE1 Zero Waste City  
S21 City Cluster  
S27 Planning contributions

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

Air Quality SPD (July 2017);

Archaeology and Development Guidance SPD (July 2017);

City Lighting Strategy (October 2018);

City Transport Strategy (May 2019);

City Waste Strategy 2013-2020 (January 2014);

Protected Views SPD (January 2012);

City of London's Wind Microclimate Guidelines (2019);

Planning Obligations SPD (July 2014);

Open Space Strategy (2016);

Office Use SPD (2015);

City Public Realm (2016);

Cultural Strategy 2018 – 2022 (2018).

Fleet Street Conservation Area Character Summary and Management Strategy SPD 2015

Whitefriars Conservation Area Character Summary and Management Strategy SPD 2016

St Paul's Cathedral Conservation Area Character Summary and Management Strategy SPD 2013

Temples Conservation Area Character Summary

### **Other**

Tower of London World Heritage Site Management Plan

## Relevant Local Plan Policies

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

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

#### ***DM1.1 Protection of office accommodation***

To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable office use and there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons:

- a) prejudicing the primary business function of the City;
- b) jeopardising the future assembly and delivery of large office development sites;
- c) removing existing stock for which there is demand in the office market or long term viable need;
- d) introducing uses that adversely affect the existing beneficial mix of commercial uses.

#### ***DM1.2 Protection of large office sites***

To promote the assembly and development of sites for large office schemes in appropriate locations. The City Corporation will:

- a) assist developers in identifying large sites where large floorplate buildings may be appropriate;
- b) invoke compulsory purchase powers, where appropriate and necessary, to assemble large sites;
- c) ensure that where large sites are developed with smaller buildings, the design and mix of uses provides flexibility for potential future site re-amalgamation;
- d) resist development and land uses in and around potential large sites that would jeopardise their future assembly, development and operation, unless there is no realistic prospect of the site coming forward for redevelopment during the Plan period.

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

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

- a) new accommodation suitable for small and medium sized businesses or occupiers;

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

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

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

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

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

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

- 1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.
- 2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:
  - a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply (TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
  - b) reasonable gas and water supply considering the need to conserve natural resources;
  - c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
  - d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
  - e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

- 3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.
- 4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

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

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

#### ***DM3.1 Self-containment in mixed uses***

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

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

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

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

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

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

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

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

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

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

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

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

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f)the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;

- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

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

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

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

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

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

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

- a) the predominant use of the space, surrounding buildings and adjacent spaces;

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

### ***DM10.5 Shopfronts***

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

- a) respect the quality and architectural contribution of any existing shopfront;
- b) respect the relationship between the shopfront, the building and its context;
- c) use high quality and sympathetic materials;
- d) include signage only in appropriate locations and in proportion to the shopfront;
- e) consider the impact of the installation of louvres, plant and access to refuse storage;
- f) incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
- g) not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
- h) resist external shutters and consider other measures required for security;
- i) consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
- j) be designed to allow access by users, for example, incorporating level entrances and adequate door widths.



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

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

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

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

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

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

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).

4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

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

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

#### ***DM15.8 Contaminated land***

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

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

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

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

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

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

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

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.
2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:
  - a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
  - b) the shortest practicable routes between relevant points.
3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.
6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

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

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

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

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

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

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are

provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.

4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

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

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

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

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.

2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

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

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

a) reuse of existing structures;



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

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

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

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

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
  - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
  - b) the benefits of the development outweigh the flood risk to future occupants;
  - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.
2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:
  - a) all sites within the City Flood Risk Area as shown on the Policies Map; and
  - b) all major development elsewhere in the City.
3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.
4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.
5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

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

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

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

### ***DM18.3 Flood protection and climate***

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

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

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

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

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.
2. New open space should:
  - a) be publicly accessible where feasible; this may be achieved through a legal agreement;
  - b) provide a high quality environment;

- c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
- d) have regard to biodiversity and the creation of green corridors;
- e) have regard to acoustic design to minimise noise and create tranquil spaces.

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

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

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

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

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

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

### ***DM20.3 Retail uses elsewhere***

To resist the loss of isolated and small groups of retail units outside the PSCs and Retail Links that form an active retail frontage, particularly A1 units near residential areas, unless it is demonstrated that they are no longer needed.

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

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

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

1. The amenity of existing residents within identified residential areas will be protected by:
  - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;

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

## **SCHEDULE**

**APPLICATION: 20/00997/FULEIA**

**Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street, London, EC4Y**

**a) Demolition of existing buildings, comprising 69-71 Fleet Street, 72-78 Fleet Street (Chronicle House), 80-81 Fleet Street, 8 Salisbury Court, 1 Salisbury Square, 35 Whitefriars Street (Hack and Hop public house), 36-38 Whitefriars Street, and 2-6 Salisbury Square (Fleetbank House); b) Part demolition of 2-7 Salisbury Court (Grade II) and carrying out of works including remodelling at roof level, formation of new facade to south elevation, part new facade to west elevation and new core and part new floors. Part replacement fenestration, new plant and other works associated with change of use to drinking establishment with expanded food provision (sui generis); c) Erection of three new buildings: 1). A combined court building (Class F1), 2). A police headquarters building (sui generis), and 3). A commercial building including offices, retail and cycle hub (Class E); d) Creation of shared basement for emergency response vehicles, parking, mechanical, electrical and plumbing (MEP), and ancillary functions associated with the three new buildings, with ingress and egress from Whitefriars Street; e) Public realm and highway works, including enlarged Salisbury Square, landscaping, access and servicing arrangements, new pedestrian routes, hostile vehicle mitigation (HVM) measures, and bicycle and vehicle parking; f) Dismantling, relocation and reconstruction of Grade II listed Waithman obelisk within Salisbury Square; g) Other associated and ancillary works and structures. This application has been submitted alongside two applications for listed building consent (20/00996/LBC and 20/00998/LBC). (Full Proposal can be viewed here: [https://www.planning2.cityoflondon.gov.uk/online-applications/files/D884AE456F4EE5B5985AB871870383F3/pdf/20\\_00997\\_FULEIA-FULL\\_APPLICATION\\_PROPOSAL-494132.pdf](https://www.planning2.cityoflondon.gov.uk/online-applications/files/D884AE456F4EE5B5985AB871870383F3/pdf/20_00997_FULEIA-FULL_APPLICATION_PROPOSAL-494132.pdf))**

## **CONDITIONS**

- 1** The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
**REASON:** To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2** In this condition "Local Procurement Charter" means the document entitled "Local Procurement Charter for City Developers" (published in February 2011) and associated guidance adopted by the City Corporation in January 2011 together with any amendments or revisions thereto.

(A) A Local Procurement Strategy shall be submitted to and approved in writing by the Local Planning Authority prior to any works commencing. The submitted strategy shall include:

- (a) details of initiatives to identify local procurement opportunities relating to the construction of the development and how the tender process will be used to achieve the targets below;
- (b) details of initiatives to reach a 10% target for local procurement from Local SME's and how the tender process will be used to achieve the targets;
- (c) the timings and arrangements for the implementation of such initiatives; and
- (d) suitable mechanisms for the monitoring of the effectiveness of such initiatives to maximise opportunities for local SMEs to access contracts for goods and services pursuant to the Local Procurement Charter at least bi annually.

(B) Monitoring reports shall be submitted to the Local Planning Authority at least bi-annually to assess:

- a) The performance by all contractors and subcontractors in achieving the 10% Local SME procurement spend target identified in the Local Procurement Charter and associated guidance and benchmark that performance against the approved Local Procurement Strategy and the overall estimated construction procurement spend on all goods and services
- b) all Local SMEs which are sent a tender enquiry or a tender invitation, and all contractors and sub-contractors detailing: the date, the goods and services tendered for and the outcome and value of the tender;
- c) all Local SME suppliers of goods and services which are used by the Owner and all contractors and sub-contractors together with: the value and type of the goods and services procured (irrespective of whether or not these goods and services were procured pursuant to a tender).

(C) In the event that the Monitoring Reports submitted pursuant to Part B above demonstrate that targets are not being achieved a revised Local Procurement Strategy incorporating revisions requested by the LPA shall be submitted to and approved by the LPA.

(D) A final report shall be submitted to the Local Planning Authority no later than one month after occupation of the development:

- (a) Assessing the overall performance in achieving the 10% Local SME procurement spend target identified in the Local Procurement Charter and benchmarking that performance against the approved Local Procurement Strategy and the actual total construction procurement spend on all goods and services;
- (b) Providing details of all Local SMEs which were used to procure goods and services together with the total spend on goods and services procured from Local SMEs, such details to include the name and contact details of the appropriate person(s) within the Local SME

(E) The Development shall be carried out in accordance with the approved Local Procurement Strategy and the Local Procurement Charter as may be revised under Part C above until the development is occupied.

REASON: To manage the impact of development in accordance with policy CS4 of the Local Plan.

- 3 In this condition "Neighbouring London Boroughs" means the London Boroughs of Camden, Hackney, Islington, Lambeth, the Royal Borough of Kensington and Chelsea, Southwark, Tower Hamlets Wandsworth and the City of Westminster;
- A. A Local Training Skills and Job Brokerage (Demolition) Strategy shall be submitted to and approved in writing by the Local Planning Authority prior to any works commencing. The submitted strategy shall include details of:
- a. the advertising of all vacancies relating to the demolition works within the City of London and the Neighbouring London Boroughs via local job brokerage and employment support agencies;
  - b. identifying in advance skills needs which could be met through local training providers and shall provide a plan for meeting such needs;
  - c. measures to meet a target of 20% of the total workforce on the site being resident in the City and Neighbouring London Boroughs;
  - d. the proposed target of apprenticeships to be generated on the Site and recruited from the City and Neighbouring London Boroughs;
  - e. providing appropriate training to ensure effective transition from unemployment to work;
  - f. undertaking at least two community benefit and/or education projects per year of construction activity; and
  - g. providing information on the timing and implementation of these initiatives and suitable monitoring mechanisms.

B. The development shall be carried out in accordance with the approved Local Training Skills and Job Brokerage (Demolition) Strategy.

REASON: To manage the impact of development in accordance with policy CS4 of the Local Plan.

- 4 In this condition "Neighbouring London Boroughs" means the London Boroughs of Camden, Hackney, Islington, Lambeth, the Royal Borough of Kensington and Chelsea, Southwark, Tower Hamlets Wandsworth and the City of Westminster;
- A. A Local Training Skills and Job Brokerage (Construction) Strategy shall be submitted to and approved in writing by the Local Planning Authority prior to any works commencing. The submitted strategy shall include details of:

- a. advertising of all vacancies relating to the construction works within the City of London and the Neighbouring London Boroughs via local job brokerage and employment support agencies;
- b. identifying in advance skills needs which could be met through local training providers and provide a plan for meeting such needs;
- c. measures to meet a target of 20% of the total workforce on the site being resident in the City and Neighbouring London Boroughs;
- d. proposed target of apprenticeships to be generated on the site and recruited from the City and Neighbouring London Boroughs;
- e. providing appropriate training to ensure effective transition from unemployment to work;
- f. undertaking at least two community benefit and/or education projects per year of construction activity; and
- g. providing information on the timing and implementation of these initiatives and suitable monitoring mechanisms.

B. The development shall be carried out in accordance with the approved Local Training Skills and Job Brokerage (Construction) Strategy.

REASON: To manage the impact of development in accordance with policy CS4 of the Local Plan.

- 5 Prior to the commencement of the development an update to the approved Circular Economy Strategy shall be submitted to and approved in writing by the Local Planning Authority, to reaffirm the proposed strategy or demonstrate improvements, and that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.  
REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: Publication London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction starts.
- 6 Prior to the commencement of the development a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the GLA at [ZeroCarbonPlanning@london.gov.uk](mailto:ZeroCarbonPlanning@london.gov.uk) and the Local Planning Authority, demonstrating that the Whole Life Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's aspirational benchmarks set out in the GLA's Whole Life-Cycle



Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life cycle of the development.

REASON : To ensure that the GLA and the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: Publication London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

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

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

- 8 Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.

REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy

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

- 9 Archaeological Evaluation and geotechnical investigation shall be carried out to compile archaeological records in accordance with an Addendum to the Written Scheme of Investigation for Archaeological Evaluation Phase 2, to be submitted to and approved in writing by the Local Planning Authority before any commencement of the Phase 2 archaeological evaluation work.  
REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.
- 10 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.  
REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.
- 11 No works except demolition to basement slab level shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.  
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 12 Prior to works hereby affected details of incorporating natural ventilation into the design of the building envelope and the services system of the Commercial Building shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.  
REASON: To comply with Local Plan Policy DM 15.5 (Climate change resilience and adaptation) and to demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.
- 13 Prior to the commencement of development, an updated Energy Assessment demonstrating the improvements in carbon emission

savings from the building is required to be submitted to and approved by the Local Planning Authority.

REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policies of the Local Plan: CS15, DM15.1, DM15.2. and of the Publication London Plan: SI 2.

- 14 Prior to the commencement of the development a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.

REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

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- 16 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan:

DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

- 17 Prior to the commencement of development, the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

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

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

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and in the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

- 19 All commemorative plaques on the existing buildings shall be carefully removed prior to demolition commencing, stored for the duration of building works, reinstated and retained on the Fleet Street elevation of the new building, for the life of the building in accordance with detailed specifications including fixing details which shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the works affected thereby.

REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.1.

- 20 The sculpture of TP O'Connor and accompanying plaque shall be carefully removed prior to demolition commencing, stored for the duration of building works, reinstated on 2-7 Salisbury Court and retained for the life of the building in accordance with detailed specifications including fixing details which shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the works affected thereby.  
REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.1.
- 21 No development other than demolition shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.  
REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- No cranes shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of those cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport.  
REASON: To ensure that the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport or London City Airport through penetration of the regulated airspace.
- 22 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's

Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

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

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

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and in the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

- 24 Before any works including demolition are begun details of the utility connection requirements of the development (or relevant part thereof) including all proposed service connections, communal entry chambers, the proposed service provider and the anticipated volume of units required for the development and a programme for the ordering and completion of service connections from the utility providers shall be submitted to the local planning authority for approval in writing. No service connections shall be ordered in connection with the development unless in accordance with the final programme approved pursuant to this condition.

REASON: To ensure that the utilities infrastructure arising from the development are met in accordance with policy CS2 of the Local Plan.

- 25 Before any works including demolition are begun a scheme of highway improvement works necessary to serve the development shall be submitted to and approved in writing by the local highways authority. Unless agreed otherwise all works are to be carried out by the City Corporation's Highway contractors. The scheme of highway works shall include such works to the public highway and related structures (including supporting structures not forming part of the public highway) as may be considered necessary by the City Corporation to make the development acceptable in planning terms including but not limited to:

- (a) Improvements to crossings, the footways and carriageways surrounding the site
  - (b) The introduction of southbound access on Whitefriars Street for rapid response vehicles leaving the site
  - (c) The realignment of kerb lines and alterations to kerbside restrictions to minimise potential obstructions on the access to the site, and any necessary alterations to mitigate the impact of carriageway widening
  - (d) The introduction of pedestrian priority measures and improvements to cycling infrastructure along Salisbury Court and Dorset Rise
  - (e) The extension and enhancement of Salisbury Square, including additional planting
  - (f) The introduction of security measures on the highway on Fleet Street and Salisbury Square
  - (g) The relocation of the bus stop on Fleet Street
  - (h) The relocation of the police checkpoint and layby on Fleet Street
  - (i) The widening of the footway along the southern Fleet Street footway within the vicinity of the site, if this proves feasible subject to the Healthy Streets Plan and discussions around the ring of steel infrastructure on Fleet Street
  - (j) The planting of street trees
- and the works shall be carried out at the Developer's expense at no cost to the City Corporation as Highway Authority.

REASON: To provide for the necessary changes to the public highway required to provide for the development in the interests of highway and pedestrian safety and to preserve the amenity of the area in accordance with the requirements of policies [x]

- 26 Notwithstanding the details shown on the approved plans, details of the following shall be submitted to and approved by the Local Planning Authority prior to the commencement of construction:

- o The steps on the northern part of Salisbury Square, adjacent to 2-7 Salisbury Court, which shall have even height risers when ascending or descending with handrails as necessary;
- o Seating adjacent to Waithman's Obelisk; and
- o The location, species, and tree pit details for trees on Fleet Street.

REASON: To ensure that the design is acceptable and the development is accessible in accordance with the following policies of the Local Plan: DM10.1 and DM10.4.

- 27 The development shall incorporate such measures as are necessary within the site to resist structural damage and to protect the approved new public realm within the site, arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.

REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 28 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems including blue roofs, rainwater pipework, flow control devices, pumps, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 1.7 litres per second from no more than one distinct outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 100m<sup>3</sup>;

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

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

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

- 29 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in



conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

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

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

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

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

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

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

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

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- 35 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority

and all works pursuant to this consent shall be carried out in accordance with the approved details:

a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;

b) details including a photographic survey and description of joinery including window and door details that are:

i) to be retained for re-use in the new building;

ii) to be replicated in the new building;

iii) are to be discarded;

c) submission of a schedule and drawings of all joinery, conservation and repair method statement, including windows, doors and shopfront at a scale of 1:1, 1:15 or 1:10 as appropriate ;

d) submission of a method statement for cleaning including sample panels, which are to be assessed on site ;

e) a method statement for any conservation and repair of the retained fabric, including sample panels to be assessed on site;

f) details of all new material samples including masonry, bricks and all roof tiles and roof coverings to match existing ;

g) details of all new decorative panels and carved details including samples, which are to be assessed on site;

h) details of the proposed roof gables including junctions with the existing retained elevation and new structure including roof;

i) details of all junctions with the Court building;

j) detail of all junctions with the Harrow Public House

j) details of all junctions with the adjoining development;

k) construction details of new south elevation including all decorative details at a scale of 1:10 or as agreed;

l) details of the internal fit out for all public areas including lower ground, ground and first floors;

m) details of the integration of plant, flues, ductwork, fire escapes, all services including any external manifestations and other excrescences at roof level;

n) details of the external lighting;

o) details of the internal lighting for all public areas including lower ground, ground and first floors;

p) details of all decorative metal work including railings;

q) details of the rainwater goods and hopper heads;

r) details of new external signage.

REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

- 36 Prior to the commencement of relevant works a Public Art Strategy for the Fleet Street elevation of the Court building shall be submitted to and approved in writing by the Local Planning Authority. The approved Public Art shall be installed 6 months prior to occupation and remain in situ for the lifetime of the development. The development shall be implemented in accordance with the approved details.

REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.1.

- 37 Prior to the commencement of relevant works details of new commemorative plaques on 2-7 Salisbury Court, including location, materials and fixing details, shall be submitted to and approved in writing by the Local Planning Authority. The approved commemorative plaques shall be installed 6 months prior to occupation and remain in situ for the lifetime of the building. The development shall be implemented in accordance with the approved details

REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.1.

Before any works thereby affected are begun the following details in respect of the Court building shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) particulars and samples of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces, soffits
- (b) details of the proposed new facades including details of a typical window (glazed and metal screen) bay, sills, glazing bars, oriel bay, hanging window bay, louvered door, utilities access, of the development for each facade and fenestration;
- (c) typical masonry details, including jointing and any necessary expansion/movement joints;
- (d) details of ground and first floor elevations including all entrances, vitrines and information boards;
- (e) details of masonry engravings and ornamentation
- (f) details of sunken courtyards
- (g) full details of the Garden Terrace, including all elevations, entrances, fenestration, planters, seating, lighting, wind mitigation measures, the walkway, soffit, drainage, irrigation and any infrastructure required to deliver programming and varied uses
- (h) details of soffits, hand rails and balustrades,
- (i) details of junctions with adjoining premises and listed building;
- (j) details of the integration of window cleaning equipment and any enclosure thereof, plant, flues, and other excrescences at roof level including within the plant room;
- (k) details of the integration of M&E in all external and semi-external public elevations in the podium from ground to garden level

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

- 38 Before any works thereby affected are begun the following details in respect of the Police building shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and samples of the materials to be used on all external and internal faces of the building and surface treatments in areas where the public would have access, including internal ground entrances and foyers, signage, lighting, jointing and integrated drainage
  - (b) details of the proposed new facades and roofs including details of typical bays of the development for each façade, louvered door, utilities access, glazed entrance
  - (c) details of key junction types and junctions across the building including: interface with public realm level changes ; roof and facade interfaces; façade and lightwell garden, basement plant and plant room with public highway
  - (d) details of ground and first floor elevations including all entrances, information boards;
  - (e) full details of the heliostat winter garden, elevations, light wells, fenestration, planters, lighting, soffit, drainage, irrigation and any infrastructure required to deliver programming and varied uses;
  - (f) full details of the Garden Terrace, including all elevations, handrails, balustrades, planters, seating, lighting, drainage, irrigation and any infrastructure required to deliver programming and varied uses
  - (g) details of the integration of window cleaning equipment and any enclosure thereof, plant, flues, and other excrescences at roof level including within the plant room;
  - (h) details of the integration of M&E in all external and semi-external public elevations in the podium from ground to garden level;
  - (i) details of all ground floor service entrances
  - (j) details of the 'Conservatory' planting - details (including glazing) and maintenance

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

- 39 Before any retail units are occupied the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) Detailed design of shopfronts

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM10.5, DM10.8, DM12.1, DM12.2 and DM15.7.

- 40 No part of the roof areas on the Commercial building except those shown as roof terraces on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.  
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 41 Before any works thereby affected are begun the following details in respect of the Commercial building shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and samples of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces, including details of compliance with approved Circular Economy Strategy;
  - (b) details of the proposed new facades and roofs including details of typical bays of the development for each façade, ram pressed terracotta panels, columns and fenestration;
  - (c) details of canopies including soffits, jointing and integrated drainage and lighting;
  - (d) details of key junction types and junctions across the building including: public passage between the Harrow public House and the proposed development; interface with public realm level changes ; roof and facade interfaces; interfaces to include any expansion/movement joints
  - (e) details of junctions with adjoining premises;
  - (f) details of ground and first floor elevations including all entrances, gates, information boards;
  - (g) full details of the Garden Terrace, including all elevations, handrails, balustrades, planters, seating, lighting, drainage, irrigation and any infrastructure required to deliver programming and varied uses
  - (h) full details of the Cycling Hub entrance and lobby external and internal design including; all elevations; entrances, fenestration; lighting; signage; and any infrastructure required to deliver the proposed use;
  - (i) details of the integration of window cleaning equipment and any enclosure thereof, plant, flues, and other excrescences at roof level including within the plant room;
  - (j) details of the integration of M&E in all external and semi-external public elevations in the podium from ground to garden level;
  - (k) details of all ground floor service entrances
- REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

- 42 Before the works thereby affected are begun, sample panels of the ram pressed terracotta panels on the Commercial building shall be built, inspected on site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details.  
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

Prior to occupation of the development details of a signage and interpretation strategy for Salisbury Square to include the history of Salisbury Square, Robert Waithman and the Obelisk to Robert Waithman, and the newspaper industry, to include location, materials and fixing details.

REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.1.

- 43 Unless otherwise agreed in writing with the Local Planning Authority, a Conservation and Management Plan for the Obelisk to Robert Waithman shall be submitted to and approved in writing by prior to the intended date of Completion ( before practical completion ?) to include:
- a) a draft for review and comments, to include a maintenance and conservation regime
  - b) submission of final document following review and comments
- REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

- 44 An assessment of opportunities for intensifying urban greening on the ground and on the proposed buildings, as well as details of the quality and maintenance of the proposed urban greening measures shall be submitted and approved in writing by the Local Planning Authority, to include:
- a) Irrigation;
  - b) Provision for harvesting rainwater run-off from road to supplement irrigation;
  - c) Spot heights for ground levels around planting pits;
  - d) Soil;
  - e) Planting pit size and construction;
  - f) Tree guards;

- g) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted, root development and contribution to enhance biodiversity;
- h) Details of all soft landscaping including species and contribution to enhance biodiversity;
- i) Seating; and
- j) Paving materials including engraved materials showing the historic line of Salisbury Square

to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced.

45 All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.  
REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

46 All terraces shall be treated in accordance with a landscaping scheme to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within 5 years of completion of the development shall be replaced with trees and shrubs of similar size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.  
REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

47 Details of the position and size of the green/blue roof(s), the type of planting and the contribution of the green/blue roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.  
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in

accordance with the following policies of the Local Plan: DM18.2, DM19.2.

- 48 Details of the position and size of the green walls(s), the type of planting, irrigation and the contribution of the green wall(s) to biodiversity shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development.  
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 49 Before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.  
REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.
- 50 Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.  
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036.
- 51 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the retail uses (Class E and sui generis) and any Class E (office) kitchens. Flues must terminate at roof



level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the said use takes place and retained for the life of the building.

REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

- 52 No cooking shall take place within any Class E or sui generis use hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

- 53 All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3.

- 54 The proposed office development sharing a party wall element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter. A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

- 55 No development shall be occupied until confirmation has been provided that either:- 1. Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All wastewater network upgrades

required to accommodate the additional flows from the development have been completed.

REASON: Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents.

- 56 No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.

- 57 Once the building construction is completed and prior to the development being occupied (or, if earlier, prior to the development being handed over to a new owner or proposed occupier) a post-completion report shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.

REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the Publication London Plan.

- 58 Prior to occupation of any of the buildings hereby permitted the following details relating to signage shall be submitted to and approved in writing by the Local Planning Authority and all signage placed on the development site shall be in accordance with the approved details:

(a) A Signage Strategy for the retail unit within the development shall be submitted;

(b) A Signage Strategy relating to the cycle hub shall be submitted and this strategy shall make provision for clear signs to be placed in prominent positions on the development site, including signage indicating the access point for cycle hub; and

c) A Signage Strategy for 2-7 Salisbury Court;

d) A Signage Strategy for the Police Building;

e) A Signage Strategy for the Court Building;

f) A Signage Strategy for the Commercial Building

All signage relating to cycle hub (as approved in the signage strategy) must be erected and in place on the development site prior to occupation of the building.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM10.5, DM10.8, DM12.1, DM12.2 and DM15.7.

- 59 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
- (b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.
- (c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 60 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

- 61 Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.

REASONS: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.

- 62 Prior to occupation of the Court Building details and location of a 'Changing Places' facility within the Court Building and Police Building shall be submitted to and approved in writing by the Local Planning Authority. The facility shall remain in place for the lifetime of the building. The development shall be implemented in accordance with the approved details.  
REASON: To ensure that public buildings have 'Changing Places' facility, in accordance with the following policy of the London Plan policy S6.
- 63 Prior to the installation of the bollards on Primrose Hill, the applicant must submit a bollard operation management plan to the local planning authority for approval (in consultation with the owner of 8 Salisbury Square). Such management plan shall set out how the bollards will operate and must include commitments that:
- o the bollards shall be manned by security officers at all times when they are in the 'up' position; and
  - o any vehicle with a reason to access Primrose Hill to the north of the bollards shall be permitted entry.
- The bollards shall not be installed until such time as the management plan has been approved by the local planning authority. The bollards shall thereafter be operated in accordance with the approved management plan or such amended management plan as is approved by the local planning authority (in consultation with the owner of 8 Salisbury Square) for the life of the development.  
REASON: To ensure the management of servicing vehicles does not unduly impact on the highway in accordance with the following policy of the Local Plan: DM3.4.
- 64 Within two years of implementation a scheme of works to the highway required as part of the development shall be submitted to and approved in writing by the Local Planning Authority . The scope of the scheme of works would include but not be limited to;
- Improvements to the footways surrounding the site
  - The introduction of southbound access on Whitefriars Street for rapid response vehicles leaving the site
  - The realignment of kerb lines and alterations to kerbside restrictions to minimise potential obstructions on the access to the site, and any necessary alterations to mitigate the impact of carriageway widening
  - The introduction of pedestrian priority measures and improvements to cycling infrastructure along Salisbury Court and Dorset Rise
  - The extension and enhancement of Salisbury Square, including additional planting
  - The introduction of security measures on the highway on Fleet Street and Salisbury Square
  - The relocation of the bus stop on Fleet Street

- The relocation of the police checkpoint and layby on Fleet Street

- The widening of the footway along the southern Fleet Street footway within the vicinity of the site, if this proves feasible subject to the Healthy Streets Plan and discussions around the ring of steel infrastructure on Fleet Street.

The development shall be implemented in accordance with the approved scheme of works.

REASON: To carry out changes to the highway required by the development.

65 Prior to the installation of the drinking fountain on Salisbury Square, the applicant must submit a maintenance plan to the local planning authority for approval. The drinking fountain shall not be installed until such time as the maintenance plan has been approved by the local planning authority. The drinking fountain shall thereafter be operated in accordance with the approved maintenance plan or such amended management plan as is approved by the local planning authority for the life of the development.

REASON: In the interests of public health.

66 Prior to the installation of the lift on the Southern Passage, the applicant must submit detail on the specification of the proposed lift to the local planning authority for approval. The lift shall not be installed until such time as specification has been approved by the local planning authority.

REASON: To ensure that the southern passage remains accessible for the lifetime of the development in accordance with the following policies of the Local Plan: DM10.1 and DM10.4.

67 Prior to the installation of the lift on the Southern Passage, the applicant must submit a maintenance plan to the local planning authority for approval. The lift shall not be installed until such time as the maintenance plan has been approved by the local planning authority. The lift shall thereafter be operated in accordance with the approved maintenance plan or such amended management plan as is approved by the local planning authority for the life of the development.

REASON: To ensure that the southern passage remains accessible for the lifetime of the development in accordance with the following policies of the Local Plan: DM10.1 and DM10.4.

68 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.

REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.

- 69 A post construction BREEAM assessment for each of the 3 new buildings and the listed building demonstrating that a target rating of 'Outstanding' has been achieved (or, if first agreed by the local planning authority a minimum rating of 'Excellent' has been achieved) shall be submitted as soon as practicable after practical completion. In the event that the local planning authority is asked to agree a minimum rating of "Excellent" it must be first demonstrated to the satisfaction of the local planning authority that all reasonable endeavours have been used to achieve an "Outstanding' rating. The details shall thereafter be retained.  
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.
- 70 Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority and the GLA at: ZeroCarbonPlanning@london.gov.uk. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.  
REASON: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the Publication London Plan.
- 71 Within 6 months of completion details must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.  
REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.
- 72 For the use of the Court Building, permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the Court building sufficient to accommodate a minimum of 21 long stay pedal cycle spaces. The cycle parking provided on the site must remain ancillary to the use of the Court building and must be available at all times throughout the life of the building for the sole use of the

occupiers thereof and their visitors without charge to the individual end users of the parking.

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

- 73 A minimum of 3 showers and 21 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the Court building in accordance with the approved plans.  
REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 74 For the use of the Police Building, permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 140 long stay pedal cycle spaces. The cycle parking provided on the site must remain ancillary to the use of the Police building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.  
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.
- 75 A minimum of 14 showers and 140 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the Police building in accordance with the approved plans.  
REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 76 For the use of the Commercial Building, permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 158 long stay pedal cycle spaces. The cycle parking provided on the site must remain ancillary to the use of the Commercial building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.  
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.

- 77 A minimum of 16 showers and 158 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the Commercial building for the use of occupiers of the building in accordance with the approved plans.  
REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 78 For the use of the retail unit, permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the retail unit sufficient to accommodate a minimum of 2 long stay pedal cycle spaces. The cycle parking provided on the site must remain ancillary to the use of the retail unit and must be available at all times throughout the life of the units for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.  
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.
- 79 A minimum of 1 shower and 2 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the retail unit for the use of occupiers of the unit in accordance with the approved plans.  
REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 80 For the use of the Public House, permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the Public House sufficient to accommodate a minimum of 7 long stay pedal cycle spaces. The cycle parking provided on the site must remain ancillary to the use of the Public House and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.  
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.
- 81 A minimum of 1 shower and 2 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the Public House for the use of occupiers of the building in accordance with the approved plans.  
REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.



- 82 A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.  
REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy T5 cycling, emerging City Plan policy 6.3.24.
- 83 Prior to the occupation of the development, the applicant must submit a cycle hub management plan to the local planning authority for approval. Such management plan shall set out how the hub will be managed and must include commitments that:
- o The hub will remain free to use for members of the public in perpetuity
- The hub shall thereafter be operated in accordance with the approved management plan or such amended management plan as is approved by the local planning authority for the life of the development.  
REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 84 A clear unobstructed minimum headroom of 5m must be maintained for the life of the building in the refuse skip collection area as shown on the approved drawings and a clear unobstructed minimum headroom of 4.75m must be provided and maintained over the remaining areas and access ways.  
REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with the following policy of the Local Plan: DM16.5.
- 85 Details of a Delivery and Servicing Management Plan demonstrating the arrangements for control of the arrival and departure of vehicles servicing the premises shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. The building facilities shall thereafter be operated in accordance with the approved Delivery and Servicing Management Plan (or any amended Servicing Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the building. The Delivery and Servicing Management Plan must make provision for;
- No servicing by motorised vehicles of the Court, Police or Commercial buildings between then hours of 0700 - 1900 on any day
  - No servicing by motorised vehicles of the Public House or Retail Unit between the hours of 0700 - 1000, 1200 - 1400 and 1600 - 1900 on any day
  - All servicing of the courts, police and commercial buildings to take place within the basement servicing area, except for case file deliveries to the court building

- All vehicles arriving at the basement servicing area must come from an off-site consolidation centre
- There shall be no more than 80 delivery and servicing vehicles to all of the proposed buildings in total over any 24 hour period

REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: DM16.1.

- 86 The loading and unloading areas at basement level must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.  
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.
- 87 Facilities must be provided and maintained for the life of the development so that vehicles may enter and leave the building by driving in a forward direction.  
REASON: To ensure satisfactory servicing facilities and in the interests of public safety in accordance with the following policy of the Local Plan: DM16.5.
- 88 The threshold of all vehicular and pedestrian access points shall be at the same level as the rear of the adjoining footway.  
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
- 89 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of each of the buildings for the use of all the occupiers.  
REASON: To ensure the satisfactory servicing of the buildings in accordance with the following policy of the Local Plan: DM17.1.
- 90 The archaeological evaluation shall be carried out in accordance with the 'Written Scheme of Investigation for an Archaeological Evaluation', dated 02/09/2020, hereby approved, in order to compile archaeological records.  
REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.
- 91 No plant or telecommunications equipment shall be installed on the exterior of the building, including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.  
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

- 92 The pass doors shown adjacent to or near the to the main entrances on the drawings hereby approved shall remain unlocked and available for use at all times when the adjacent revolving doors are unlocked.

REASON: In order to ensure that disabled people are not discriminated against and to comply with the following policy of the Local Plan: DM10.8.

- 93 Provision shall be made for disabled people to obtain access to the Court Building, Police Building and Commercial Building via all entrances without the need to negotiate steps and provision shall be made for disabled people to obtain access to 2-7 Salisbury Court without the need to negotiate steps. This access shall be maintained for the life of the building.

REASON: To ensure that disabled people are able to use the building in accordance with the following policy of the Local Plan: DM10.8.

- 94 The terraces hereby permitted at the following locations:

- Court Building - levels 5, 6 and 7;
- Police Building - level 9; and
- Commercial Building - levels 4, 6 and 9

shall not be used or accessed between the hours of 22.00 hrs on one day and 08.00 hrs on the following day, and not at any time on Sundays or Bank Holidays, other than in the case of emergency.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 95 No amplified or other music shall be played on the roof terraces.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 96 No live or recorded music that can be heard outside the premises shall be played.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 97 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 98 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.

REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

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

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

- 100 The areas shown on the approved drawings as public house use (Class Sui Generis) (including external terrace on Salisbury Square), shall be used for this purposes only and for no other purpose (including any other purpose in Sui Generis) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument amending or revoking and re-enacting that Order with or without modification.

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

- 101 The development shall provide:  
18,843sq.m Court building (sui generis)  
20,641sqm Police Station (sui generis)  
11,783 sqm office building (Class E)  
256sq.m retail use (Class E)  
1,138sq.m public house (sui generis)  
281sqm cycle hub (Class E )  
1,786 sqm public realm

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

- 102 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: FSE-EPA-MP-ZZ-PL-A-007000

Rev P00, FSE-EPA-MP-ZZ-PL-A-007001 Rev P00, FSE-EPA-MP-ZZ-PL-A-007002 Rev P00, FSE-EPA-MP-B2-PL-A-000070 Rev P01, FSE-EPA-MP-B1-PL-A-000080 Rev P01, FSE-EPA-MP-LG-PL-A-000090 Rev P01, FSE-EPA-MP-GF-PL-A-000100 Rev P01, FSE-EPA-MP-01-PL-A-000110 Rev P01, FSE-EPA-MP-02-PL-A-000120 Rev P01, FSE-EPA-MP-03-PL-A-000130 Rev P01, FSE-EPA-MP-04-PL-A-000140 Rev P01, FSE-EPA-MP-05-PL-A-000150 Rev P01, FSE-EPA-MP-06-PL-A-000160 Rev P01, FSE-EPA-MP-07-PL-A-000170 Rev P01, FSE-EPA-MP-08-PL-A-000180 Rev P01, FSE-EPA-MP-09-PL-A-000190 Rev P01, FSE-EPA-MP-ZZ-EL-A-000300 Rev P01, FSE-EPA-MP-ZZ-EL-A-000320 Rev P01, FSE-EPA-MP-ZZ-EL-A-000360 Rev P01, FSE-EPA-MP-ZZ-SE-A-000400 Rev P01, FSE-EPA-MP-ZZ-SE-A-000410 Rev P01, FSE-EPA-MP-ZZ-SE-A-000420 Rev P01, FSE-EPA-MP-ZZ-SE-A-000430 Rev P01, SU01 Rev P01, SU02 Rev P01, SU03 Rev P01, SU04 Rev P01, SU05 Rev P01, SU06 Rev P01, SU07 Rev P01, SU08 Rev P01, SU11 Rev P01, SU12 Rev P01, SU20 Rev P01, SU21 Rev P01, FSE-EPA-MP-B2-PL-A-050807 Rev P01, FSE-EPA-MP-B1-PL-A-050808 Rev P01, FSE-EPA-MP-LG-PL-A-050809 Rev P01, FSE-EPA-MP-GF-PL-A-050810 Rev P01, FSE-EPA-MP-01-PL-A-050811 Rev P01, FSE-EPA-MP-02-PL-A-050812 Rev P01, FSE-EPA-MP-03-PL-A-050813 Rev P01, FSE-EPA-MP-04-PL-A-050814 Rev P01, FSE-EPA-MP-05-PL-A-050815 Rev P01, FSE-EPA-MP-06-PL-A-050816 Rev P01, FSE-EPA-MP-07-PL-A-050817 Rev P01, FSE-EPA-MP-08-PL-A-050818 Rev P01, FSE-EPA-MP-09-PL-A-050819 Rev P01, FSE-EPA-MP-ZZ-EL-A-050830 Rev P01, FSE-EPA-MP-ZZ-EL-A-050832 Rev P01, FSE-EPA-MP-ZZ-EL-A-050836 Rev P01, FSE-EPA-MP-ZZ-SE-A-050840 Rev P01, FSE-EPA-MP-ZZ-SE-A-050841 Rev P01, FSE-EPA-MP-ZZ-SE-A-050842 Rev P01, FSE-EPA-MP-ZZ-SE-A-050843 Rev P01, D101 Rev P01, D102 Rev P01, D103 Rev P01, D104 Rev P01, D105 Rev P01, D106 Rev P01, D107 Rev P01, D108 Rev P01, D109 Rev P01, D110 Rev P01, D111 Rev P01, D112 Rev P01, FSE-EPA-MP-B2-PL-A-050070 Rev P01, FSE-EPA-MP-B1-PL-A-050080 Rev P01, FSE-EPA-MP-LG-PL-A-050090 Rev P02, FSE-EPA-MP-GF-PL-A-050100 Rev P03, FSE-EPA-MP-01-PL-A-050110 Rev P02, FSE-EPA-MP-RF-PL-A-050210 Rev P03, FSE-EPA-MP-ZZ-EL-A-050300 Rev P01, FSE-EPA-MP-ZZ-EL-A-050320 Rev P01, FSE-EPA-MP-ZZ-EL-A-050360 Rev P02, FSE-EPA-MP-ZZ-SE-A-050400 Rev P02, FSE-EPA-MP-ZZ-SE-A-050420 Rev P01, FSE-EPA-MP-GF-PL-A-050610 Rev P01, FSE-EPA-CT-LG-PL-A-051090 Rev P01, FSE-EPA-CT-GF-PL-A-051100 Rev P01, FSE-EPA-CT-01-PL-A-051110 Rev P01, FSE-EPA-CT-02-PL-A-051120 Rev P01, FSE-EPA-CT-03-PL-A-051130 Rev P01, FSE-EPA-CT-04-PL-A-051140 Rev P01, FSE-EPA-CT-05-PL-A-051150 Rev P01, FSE-EPA-CT-06-PL-A-051160 Rev P01, FSE-EPA-CT-07-PL-A-051170 Rev P02, FSE-EPA-CT-RF-PL-A-051210 Rev P02, FSE-EPA-CT-ZZ-EL-A-051300 Rev P01, FSE-EPA-CT-ZZ-EL-A-051320 Rev P01, FSE-EPA-CT-ZZ-EL-A-051340 Rev P01, FSE-EPA-CT-ZZ-EL-A-051360 Rev P01, FSE-EPA-CT-ZZ-EL-A-051382 Rev P01, FSE-EPA-CT-ZZ-SE-A-051400 Rev P01, FSE-EPA-CT-ZZ-SE-A-051410 Rev P01, FSE-EPA-CT-ZZ-DT-A-051600 Rev P01, FSE-EPA-CT-ZZ-DT-A-051601 Rev P01, FSE-EPA-CT-ZZ-DT-A-051640

Rev P01, FSE-EPA-CT-ZZ-DT-A-051641 Rev P01, FSE-EPA-CT-ZZ-DT-A-051660 Rev P01, FSE-EPA-CT-GF-DT-A-051800 Rev P01, FSE-EPA-CT-01-DT-A-051801 Rev P01, FSE-EPA-CT-ZZ-DT-A-051815 Rev P01, FSE-EPA-CT-ZZ-DT-A-051831 Rev P01, FSE-EPA-CT-ZZ-DT-A-051833 Rev P01, FSE-EPA-CT-03-DT-A-051853 Rev P01, FSE-EPA-CT-ZZ-DT-A-051903 Rev P01, 674.CT.02.001 Rev P01, 674.CT.02.002 Rev P01, 674.CT.02.003 Rev P02, FSE-EPA-PB-B2-PL-A-052070 Rev P01, FSE-EPA-PB-B1-PL-A-052080 Rev P01, FSE-EPA-PB-LG-PL-A-052090 Rev P01, FSE-EPA-PB-LG-PL-A-052091 Rev P01, FSE-EPA-PB-GF-PL-A-052100 Rev P01, FSE-EPA-PB-01-PL-A-052110 Rev P01, FSE-EPA-PB-02-PL-A-052120 Rev P01, FSE-EPA-PB-03-PL-A-052130 Rev P01, FSE-EPA-PB-04-PL-A-052140 Rev P01, FSE-EPA-PB-05-PL-A-052150 Rev P01, FSE-EPA-PB-06-PL-A-052160 Rev P01, FSE-EPA-PB-07-PL-A-052170 Rev P01, FSE-EPA-PB-08-PL-A-052180 Rev P01, FSE-EPA-PB-09-PL-A-052190 Rev P01, FSE-EPA-PB-10-PL-A-052200 Rev P01, FSE-EPA-PB-RF-PL-A-052210 Rev P01, FSE-EPA-PB-ZZ-EL-A-052300 Rev P01, FSE-EPA-PB-ZZ-EL-A-052320 Rev P01, FSE-EPA-PB-ZZ-EL-A-052340 Rev P01, FSE-EPA-PB-ZZ-EL-A-052360 Rev P01, FSE-EPA-PB-ZZ-SE-A-052400 Rev P01, FSE-EPA-PB-ZZ-SE-A-052410 Rev P01, FSE-EPA-PB-ZZ-DT-A-052720 Rev P01, FSE-EPA-PB-GF-DT-A-052721 Rev P01, FSE-EPA-PB-ZZ-DT-A-052760 Rev P01, FSE-EPA-PB-GF-DT-A-052761 Rev P01, FSE-EPA-PB-ZZ-DT-A-052820 Rev P01, FSE-EPA-PB-ZZ-DT-A-052823 Rev P01, FSE-EPA-PB-ZZ-DT-A-052844 Rev P01, FSE-EPA-PB-ZZ-DT-A-052846 Rev P01, 674.PL.02.001 Rev P01, 674.PL.02.002 Rev P01, FSE-EPA-OF-B2-PL-A-054070 Rev P01, FSE-EPA-OF-B1-PL-A-054080 Rev P02, FSE-EPA-OF-GF-PL-A-054100 Rev P02, FSE-EPA-OF-01-PL-A-054110 Rev P02, FSE-EPA-OF-02-PL-A-054120 Rev P01, FSE-EPA-OF-03-PL-A-054130 Rev P01, FSE-EPA-OF-04-PL-A-054140 Rev P01, FSE-EPA-OF-05-PL-A-054150 Rev P01, FSE-EPA-OF-06-PL-A-054160 Rev P01, FSE-EPA-OF-07-PL-A-054170 Rev P01, FSE-EPA-OF-08-PL-A-054180 Rev P01, FSE-EPA-OF-09-PL-A-054190 Rev P02, FSE-EPA-OF-ZZ-EL-A-054300 Rev P01, FSE-EPA-OF-ZZ-EL-A-054320 Rev P02, FSE-EPA-OF-ZZ-EL-A-054340 Rev P02, FSE-EPA-OF-ZZ-EL-A-054360 Rev P02, FSE-EPA-OF-ZZ-SE-A-054400 Rev P01, FSE-EPA-OF-ZZ-DT-A-054700 Rev P01, FSE-EPA-OF-ZZ-DT-A-054710 Rev P01, FSE-EPA-OF-ZZ-DT-A-054720 Rev P01, FSE-EPA-OF-ZZ-DT-A-054730 Rev P02, FSE-EPA-OF-ZZ-DT-A-054740 Rev P03, FSE-EPA-OF-ZZ-DT-A-054800 Rev P01, FSE-EPA-OF-ZZ-DT-A-054810 Rev P01, FSE-EPA-OF-ZZ-DT-A-054830 Rev P01, 674.OF.02.001 Rev P01, 674.OF.02.002 Rev P01, 674.OF.02.003 Rev P02, D01 Rev P01, D02 Rev P01, D03 Rev P01, D04 Rev P01, D05 Rev P01, D06 Rev P01, D11 Rev P01, D12 Rev P01, D20 Rev P01, D21 Rev P01, D22 Rev P01, D220 Rev P01, D221 Rev P01, D222 Rev P01, 674.02.001 Rev P03, 674.02.001P Rev P03, 674.02.006 Rev P02, 674.02.007 Rev P01, 674.02.008 Rev P02, 674.02.009 Rev P01, 674.02.010 Rev P01, 674.02.011 Rev P02, 674.02.012 Rev P03, 674.02.102 Rev P01, 674.02.104 Rev P01, 674.02.106 Rev P01, 674.02.110 Rev P01,

674.02.121 Rev P02, 674.02.123 Rev P01, 674.02.124 Rev P01, 674.02.126 Rev P00 and 674.02.203 Rev P00.

REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

## INFORMATIVES

- 1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:  
  
detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;  
  
a full pre application advice service has been offered;  
  
where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.
- 2 Heathrow Airport advises the applicant that if a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib, if a tower crane.
- 3 London City Airport advises that the applicant should contact the CAA AROPS team regarding cranes, who will consult with the relevant aerodrome stakeholders.
- 4 The grant of approval under the Town and Country Planning Acts does not overcome the need to also obtain any licences and consents which may be required by other legislation.
- 5 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 6 There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or

inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7C64ec40bf6c174206ca3108d8f4208f48%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637527767994577202%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C1000&sdata=BBRK2gWVqf02YnXR0YwIMHEvUW2ecw4AqPp%2F%2Bck%2FwfU%3D&reserved=0>

- 7 The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7C64ec40bf6c174206ca3108d8f4208f48%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637527767994587197%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C1000&sdata=XLi3LaFuPdOFdREihFNZPKz8zQA4EG8uAts9zoLYG3M%3D&reserved=0>. Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)

- 8 There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7C2cae1663cfbc4276060908d8c452fe54%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637475208016508784%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6lk1haWwiLCJXVCi6Mn0%3D%7C1000&sdata=D3LZeCanKIT73SNfk30AKOB6UK%2BHCUKqLgWpcUrqE%2Bc%3D&reserved=0>



- 9 The applicant is advised to liaise with neighbours, including St Brides Church when preparing the Demolition Environmental Management Plan, Construction Environmental Management Plan, Demolition Logistics Plan and Construction Logistics Plan.
- 10 No doors, gates or windows at ground floor level shall open over the public highway.