

Memo



To Assistant Director (Development Management)
Department of the Built Environment
Email: plncomments@cityoflondon.gov.uk

From Ms Hazel Austin
Environmental Health Officer
Department of Markets and Consumer Protection
Telephone 020 7332 3590
Email hazel.austin@cityoflondon.gov.uk

Date 19 January 2021

Our Ref WK202100362

Your Ref PT_CL/20/00997/FULEIA & 20/00998/LBC

Subject Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars St 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 department acknowledges receipt for the above pre application and has the following comments and observations to make:

No music audible outside the premises:

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.

Roof Terrace Hours:

The roof terraces in buildings as follows:

Court Building on level 6 & 7

Police building on level 9

Commercial building on levels 4, 6 & 9

hereby permitted shall not be used or accessed between the hours of 22.00 on one day and 08.00 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.

Roof Terrace Music:

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.

Promoted Events:

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.

Control of noise:

(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.

Demolition:

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

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

Construction:

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

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

Noise from use Class E affecting offices:

The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation

shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

Fumes from Use Class E affecting offices or residential:

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 Class E use. 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 Class E use takes place.

REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

Noise and vibration from mechanical systems or other plant:

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.

Contaminated Land:

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.

Sewer Vent Condition (to be used where existing sewer vent is being removed or capped and/or where sewerage pumping arrangements are being introduced)

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

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

Ventilation and extraction equipment:

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: 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

Regards

Hazel Austin
Environmental Health Officer
Pollution Team

Dept. of Markets & Consumer Protection
City of London, PO Box 270,
Guildhall, London, EC2P 2EJ

Tel: 020 7332 3590
Mob: 077 709 66721

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email plncomments@cityoflondon.gov.uk



From Stefanie Hughes
Air Quality Officer
Telephone 0207 332 3541
Email Stefanie.hughes@cityoflondon.gov.uk

Date 20/01/2021

Your Ref 20/00997/FULEIA

Subject: Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars St 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

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.

Should the development be approved please attach the following condition:

M26F 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.

REASON:

REASON: 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.

- M32 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.

The condition above has been amended slightly from the standard condition document to include reference the up to date guidance (amendments in red)

From: [NATS Safeguarding](#)
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 20/00997/FULEIA [SG30411]
Date: 20 January 2021 16:40:18
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

Our Ref: SG30411

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS

NATS Safeguarding

E: natssafeguarding@nats.co.uk

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



From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 11 January 2021 16:35
To: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Subject: Planning Application Consultation: 20/00997/FULEIA

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

Dear Sir/Madam

Please see attached consultation for Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars St London, EC4Y .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Catherine Evans

Department of the Built Environment

City of London

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From: [DD - Airport Safeguarding/BAA](#)
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 20/00997/FULEIA
Date: 22 January 2021 11:52:02
Attachments: [image001.png](#)

Classification: Public

Dear Catherine Evans

We have now assessed the below application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development. However, we would like to make the following observation:

Construction Aviation Warning Lights

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.

Kind regards

Lawrence Melkowski

Aerodrome Safeguarding Specialist
Airside Operations

Heathrow

Heathrow Airport Limited

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

m: +44 (0)7736 119025

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

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: 11 January 2021 16:35

To: DD - Airport Safeguarding/BAA <safeguarding@heathrow.com>

Subject: Planning Application Consultation: 20/00997/FULEIA

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Dear Sir/Madam

Please see attached consultation for Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars St London, EC4Y .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Catherine Evans

Department of the Built Environment

City of London

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Chief Planning Officer and Development Director
Department of the Built Environment
City of London
PO Box 270,
Guildhall,
London EC2P 2EJ

24 December 2020

Dear Sirs,

Planning Application 20/00997/FULEIA – The Salisbury Square Development, London, EC4

We write on behalf of our clients, the owners of 8 Salisbury Square, in respect of the above site and planning application. Although we understand that the application has been submitted, validated and given the above reference number, as yet no application documents appear on the LPA's web site. Our client's property will adjoin the southern-most block of the proposed scheme.

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.

These concerns are as follows:

1. Timescale

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.

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.

2. Building line

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 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.

3. 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.

4. 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.

5. 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. We hope that this will be possible and that we can meet you early in the new year to discuss these issues in greater detail. In the meantime, should you have any queries or would like to discuss matters further, please do not hesitate to contact us

Yours sincerely,

Greg Dowden
Planning Director

ST BRIDE'S CHURCH

22/01/2021

20/00997/FULEIA, 'Land Bounded by Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars St London, EC4Y'

Dear Catherine Evans

Thank you for the invitation to make observations on application reference 20/00997/FULEIA, 'Land Bounded by Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars St London, EC4Y'.

As communicated to Gary Webb (Stakeholder & Communications, City of London Corporation) and Eric Parry (of Eric Parry Architects) during our initial conversations of 3rd August 2020 and 5th November 2020, our concerns relate primarily to the following:

1. Vehicular access and parking provision
2. Impact of extra traffic and pedestrian visitors in the locality
3. Disabled Access
4. Importance of ongoing liaison
5. Scheduling of Demolition & Construction works & Noise

Having reviewed the documents made publicly available on the City of London portal, our observations related to these concerns are as follows:

1. Vehicular access & Parking provision

- 1.1 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.
- 1.2 It is noted that the intention, referenced within both the Transport Assessment, Framework Travel Plan, as well as Chapter 5 of the EIA (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'.

St Bride's Church
Fleet Street
London EC4Y 8AU



+44 (0)20 7427 0133
stbrides.com
stb@stbrides.com

ST BRIDE'S CHURCH

- 1.3 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.
- 1.4 St Bride's remains supportive of improvements to permeability and access by foot locally but stresses the importance of continued and unincumbered access to the Church by and for hearses, wedding cars, deliveries, contractors and disabled/ infirm at all times.
- 1.5 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.
- 2. Impact of additional traffic and pedestrian visitors in the locality**
- 2.1 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).
- 2.2 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.
- 2.3 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.
- 2.4 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 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.

St Bride's Church
Fleet Street
London EC4Y 8AU



+44 (0)20 7427 0133
stbrides.com
stb@stbrides.com

ST BRIDE'S CHURCH

3. Disabled Access

- 3.1 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.
- 3.2 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.
- 3.3 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.

4. Importance of ongoing liaison

- 4.1 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.
- 4.2 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.
- 4.3 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 CHURCH

- 4.4 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.

5. Scheduling of Demolition & Construction works & Noise

- 5.1 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.
- 5.2 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'.
- 5.3 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.
- 5.4 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 (18.1.11), 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'.
- 5.5 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 CHURCH

- 5.6 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.
- 5.7 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 this approach be upheld by Condition, should the City resolve to grant permission.

22.1.21

St Bride's Church
Fleet Street
London EC4Y 8AU



+44 (0)20 7427 0133
stbrides.com
stb@stbrides.com

LPA Ref: 20/00997/FULEIA

London City Airport Ref: 2021/LCY/010

Date: 25/01/2021

Dear Catherine Evans,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found not to conflict with London City Airport's current safeguarding criteria.

LPA Reference	20/00997/FULEIA
Proposal	<p> 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</p>

	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
Location	Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars St London, EC4Y
Borough	City of London
Case Officer	Catherine Evans
Maximum Proposed Height AOD	68m

Observation:

London City Airport suggests that any construction cranes participating in the project should be advised to the CAA AROPS team who will consult with the relevant aerodrome stakeholders.

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

If you need guidance, templates, documents or have any queries please contact safeguarding@londoncityairport.com

Kind regards,
Szilvia Turcsik
Technical Operations Coordinator

Date: 26 January 2021
Our ref: 339973
Your ref: 20/00997/FULEIA



Ms Catherine Evans
Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

PLNComments@cityoflondon.gov.uk

Dear Ms Evans

Planning consultation: 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.

Location: Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars St London, EC4Y

Thank you for your consultation on the above dated 11 January 2021 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on “Development in or likely to affect a Site of Special Scientific Interest” (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk

Yours sincerely

Sally Ireland
Consultations Team

Annex - Generic advice on natural environment impacts and opportunities

Sites of Special Scientific Interest (SSSIs)

Local authorities have responsibilities for the conservation of SSSIs under s28G of the Wildlife & Countryside Act 1981 (as amended). The National Planning Policy Framework (paragraph 175c) states that development likely to have an adverse effect on SSSIs should not normally be permitted. Natural England's SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the Natural England Open Data Geoportal.

Biodiversity duty

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

Protected Species

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

Local sites and priority habitats and species

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

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. The list of priority habitats and species can be found here². Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forestry Commission have produced standing advice for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

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

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

Protected landscapes

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

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

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

Landscape

Paragraph 170 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#). Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra [*Construction Code of Practice for the Sustainable Use of Soils on Construction Sites*](#), and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure.

Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

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

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

Environmental enhancement

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

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

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

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

Catherine Evans
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2021/132786/01-L01
Your ref: 20/00997/FULEIA
Date: 26 January 2021

Dear Catherine

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 remodeling 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.

Land bounded by Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars St London, EC4Y.

Thank you for contacting us regarding the above application.

The proposed development falls within Flood Zone 2, which is land defined in the planning practice guidance as being at risk of flooding.

We have produced a series of standard comments for local planning authorities and planning applicants to refer to on 'lower risk' development proposals. These comments replace direct case-by-case consultation with us. This proposal falls within this category.

These standard comments are known as Flood Risk Standing Advice (FRSA). They can be viewed at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#when-to-follow-standing-advice>.

Cont/d..



INVESTOR IN PEOPLE



We recommend that you view our standing advice in full before making a decision on this application. We do not need to be consulted.

Final Comments

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

Yours sincerely,

George Lloyd
Planning Advisor

Direct dial:

Direct e-mail: HNL SustainablePlaces@environment-agency.gov.uk



Your ref: 20/00997/FULEIA
My ref: 21/00222/OBS

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

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

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

28 January 2021

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

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

SCHEDULE

Application No.: 21/00222/OBS

Application Date:

Date Received: 11.01.2021

Date Amended: 11.01.2021

Plan Nos: Letter from City of London dated 11 January 2021.

Address: Fleetbank House, Fleet Street, Whitefriars Street, Salisbury Court And, Primrose Hill, City Of London, London

Proposal: 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.

Yours faithfully



Deirdra Armsby
Director of Place Shaping and Town Planning

Note:

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



Note:

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





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

Sent by email: PLNComments@cityoflondon.gov.uk

29 January 2021

Our ref: 20 12 14

Dear Catherine Evans

20/00997/FULEIA - Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars St London, EC4Y

The Twentieth Century Society has been notified of the above application part of which seeks permission to demolish nos. 72-78 Fleet Street (Chronicle House) and 80-81 Fleet Street (Barclays Bank). We objected to the issuing of a Certificate of Immunity (COI) from listing these two buildings in summer 2020 and argued that they satisfy the criteria for addition to the National Heritage List for England (NHLE). Chronicle House and Barclays Bank are Non-Designated Heritage Assets (NDHAs) and valuable contributors to the Fleet Street Conservation Area, and we therefore strongly object to their proposed demolition.

Background

London's Fleet Street has an impressive collection of early 20th-century buildings, most of which were built for the newspaper industry. The collective value of such buildings is recognised through the designation of the Fleet Street Conservation Area.

Chronicle House (nos. 72-78 Fleet Street) was built in 1923-24 to the designs of Herbert Owen Ellis—who is also credited with the design of the Grade II listed late 19th-century Carmelite House, built for the Daily Mail on Fleet Street—and William Lee Clarke. Chronicle House is an impressive 6 storey building of cast concrete, decorated with classical ornament, including giant pilasters, and retaining its original metal casement windows. Ellis and Clarke later collaborated with Sir Owen Williams and built The Daily Express Building at 120-129 Fleet Street which is Grade II*. Barclays Bank (nos. 80-81 Fleet Street) is an ornate 7 storey building clad in grey granite and white Portland stone. It was constructed in 1921-4 to the designs of C. J. Dawson and H. W. Allardyce. Dawson also designed the Grade II listed late 19th-century Rippleside Cemetery Chapel in Barking and the Grade II early 20th-century Barking Park War Memorial, and Dawson and Allardyce built the Grade II Ilford War Memorial Hall in the 1920s.

Policy

In relation to the Historic Environment and Development in Conservation Areas, the City of London's Local Plan (2015) outlines the City's intention of

Preserving and enhancing the distinctive character and appearance of the City's conservation areas
(Core Strategic Policy CS12: Historic Environment)

The Local Plan also states that

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. (Policy DM 12.2 Development in conservation areas)

Paragraphs 192 and 193 of the National Planning Policy Framework or NPPF (February 2019) are relevant to this application:

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 [...] c) the desirability of new development making a positive contribution to local character and distinctiveness (paragraph 192) 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 (paragraph 193)

Paragraph 197 of the NPPF relating to Non-Designated Heritage Assets (NDHAs) should also be noted:

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 (paragraph 197)

Comments

The Society believes that Barclays Bank and Chronicle House are strong contributors to a group of high quality yet stylistically 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, 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.

Summary

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.

I hope that these comments are of use to you. Please do not hesitate to contact me if you have any queries.

Yours sincerely,

The Twentieth Century Society
70 Cowcross Street, London EC1M 6EJ
coco@c20society.org.uk 020 7250 3857
www.c20society.org.uk

Coco Whittaker

Caseworker

Twentieth Century Society

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

Memo

To Assistant Director (Development Management)
Department of the Built Environment

From Lead Local Flood Authority
Department of the Built Environment

Telephone 020 7332 1949

Email tim.munday@cityoflondon.gov.uk



Date 1 February 2021

Our Ref DS/SUDS21/0002

Your Ref PT_CL/20/00997/FULEIA

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

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has reviewed the Flood Risk Assessment and Drainage Strategy Report Revision 00 for the above application and would recommend the following conditions should the application be approved:

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: green roofs, attenuation systems, rainwater pipework, flow control devices and intelligent management system, rainwater harvesting systems, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 9.9 litres per second from the total development, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 380m³;
- (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.
- (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

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.

Begum, Shupi

From: Richard Snowdon <RSnowdon@innertemple.org.uk>
Sent: 02 February 2021 14:28
To: PLN - Comments
Subject: Comment on Planning Application 20/00997/FULEIA

I write on behalf of the Honourable Society of the Inner Temple.

We have carefully considered the above planning application, and the supporting information. The Society supports the application, but would wish to comment on the wider implications for the local area, and, specifically, the impact of the proposed development on the local road network.

The application site lies to the north-east of the Temple in an area that has, in recent years, been subject to a number of local road initiatives. The most notable of these has been the installation of two primary cycle superhighway routes which intersect at Blackfriars. These have had the impact of reducing the access to the Temple estate and a loss of direct access to the Victoria Embankment. This may also pose problems for the proposed development as road access will be dependent on traffic levels in Fleet Street. The reopening of a route to the Embankment will allow efficient access and egress for Police and Court vehicles, rather than via the narrow local roads which are subject to high levels of congestion.

Prior to submission of this application, the Inner Temple and the City's Highways officers were in discussion with TfL to consider alterations to, and simplification of, the currently congested road layout on New Bridge Street. These discussions were halted due to this impending application and an impact assessment relating to the application site. We would very much welcome further discussion on this and a wider consideration of future traffic movements in the locality.

We are 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. Police response could therefore be hampered by a lack of multiple routes from the complex. It is therefore 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.

These are in line with our previous discussions with the City and TfL.



Richard Snowdon FRICS

ADDRESS

Surveyor's Department
3rd Floor
6 King's Bench Walk
Inner Temple
London, EC4Y 7DR

Director of Properties & Surveyor

TELEPHONE

020 7797 8203

ONLINE

innertemple.org.uk

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Historic England

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

Direct Dial: [REDACTED]

Our ref: P01350890

5 February 2021

Dear Ms Evans

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

**LAND BOUNDED BY FLEET STREET, SALISBURY COURT, SALISBURY
SQUARE, PRIMROSE HILL & WHITEFRIARS ST LONDON, EC4Y
Application No. 20/00997/FULEIA**

Thank you for your letter of 11 January 2021 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

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.

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 formally object to the application on the basis of what we considered to be unjustified harm to heritage significance.

Historic England Advice



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

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.

Significance of Fleet Street conservation area

The development site is within Fleet Street Conservation Area. Historically this part of London was an early suburb located just west of the medieval City. It was an area favoured by religious orders such as the Knights Templars and Whitefriars, and noted for its inns located along the processional route between Westminster and St. Paul's Cathedral. From the 16th century, the area was associated with the legal profession, which in turn led to a demand for printing and publishing.

Fleet Street and its surroundings were mostly destroyed during the Great Fire of 1666, but subsequently rebuilt on the historic street layout. The area emerged after the Great Fire as a literary hub associated with figures such as Pepys and Johnson, and was known for its coffeehouses and taverns. Gradually residential and smaller scale buildings were replaced by larger commercial buildings such as banks. After Fleet Street was widened in 1830, it developed into a centre for newspaper publishing. Small scale buildings along Fleet Street were replaced by larger buildings with purpose-built printing works located to the rear.

Fleet Street was synonymous with the nation's press and journalism trade until the latter half of the 20th century. Second World War bombing damaged areas to the north and south of Fleet Street and began the gradual decline of the area's newspaper industry, but it was not until the 1980s that the last vestiges of the industry relocated to purpose-built facilities in Wapping. Since then the area has been characterised predominantly by banks and commercial offices located within redeveloped sites or within older buildings formally associated with the newspaper trade.

The significance of the conservation area is described in detail in the City of London's Fleet Street Conservation Area Character Summary and Management Strategy SPD, and we concur with its findings.

In summary, the document confirms that Fleet Street is one of the City's most characterful historic areas. It retains elements of all of the historic phases of development described above, resulting in its characteristically complex and rich variety of buildings, and the fine-grained medieval pattern of alleyways and small plot sizes is still recognisable despite road widening and the introduction of larger buildings during the 19th and 20th centuries.

Of particular note at the development site is Salisbury Square, the form and location of which can be traced back to the medieval period as the former Great Court of the Bishop of Salisbury's palace. In addition to the well-preserved street pattern, the area retains a pleasing mix of architectural styles from narrow fronted 17th century taverns like the Tipperary to gleaming 1920s newspaper headquarters like the Daily Express building.



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

Telephone 020 7973 3700
HistoricEngland.org.uk



Significance of the buildings currently on the site

The site proposed for development is currently occupied by a mixture of modern post-war and historic pre-war buildings. The post-war buildings are of no historic or architectural interest, although the reconstructed Georgian house at No. 1 Salisbury Square makes a positive contribution to the conservation area.

The largest of the post-war office buildings, Fleetbank House, is located outside the conservation area. The redevelopment of these large buildings would be welcome in principle. However, the site also contains six historic unlisted buildings that contribute to the significance of the conservation area. These are described in more detail below.

Nos. 72-78 Fleet Street (Chronicle House) was designed as an office building for the newspaper trade by *Hebert, Ellis & Clarke* in the 1920s in a stripped back classical style in Portland stone. Next to this building on the corner plot to Salisbury Court is Nos. 80-81 Fleet Street, a neo-Baroque former bank building in Portland stone designed in the 1920s by the architects *C.J. Dawson, Son and Allardyce*. This building is attached to the Grade II listed building at Nos. 2-7 Salisbury Court, which is proposed for retention as part of the development.

Further along Salisbury Court, south of the listed building at Nos. 2-7, is No. 8 Salisbury Court, which is a narrow five storey former warehouse dating from the late 19th or early 20th century. This building is attached to No. 1 Salisbury Square, a Queen Anne/early Georgian domestic house reconstructed in the 1960s after war damage that continues to illustrate the type of buildings that surrounded Salisbury Square in the 18th and 19th century.

The fabric of the building is modern, but it is a faithful reconstruction of the war-damaged original on this site, and continues to make a positive contribution to the conservation area for its association with the area's earlier history as a residential suburb. The building also forms an important component of the ancient open space that became Salisbury Square.

The west side of the development site is formed by Whitefriars Street, which contains two historic unlisted buildings of merit. Nos. 36-38 Whitefriars Street is a narrow-fronted, early 20th century red brick office building in a plain classical style. Adjoining this building to the south is No. 35 Whitefriars Street, a Queen Anne style public house designed by *B. Wilkinson* as the Coach & Horses in 1895-97. Its richly designed Victorian façade is largely intact. It is notable that the City of London extended the conservation area boundaries in 2007 to include both buildings.

Overall, the six buildings described above contribute strongly to the significance of this part of the conservation area through their historic architecture and variety, and for their associations with the history and development of the area during the 19th and

early 20th centuries.

The Proposals and their Impact

The proposals, which have been designed by Eric Parry Architects, are for the comprehensive redevelopment of the site (apart from the Grade II listed Nos. 2-7 Salisbury Court), and the erection of three large buildings to accommodate a court, the City of London Police headquarters and commercial offices.

The proposed replacement buildings consist of a series of three large blocks. The buildings are arranged in accordance with a masterplan with the court building stretching from Whitefriars Street to Salisbury Court along Fleet Street. South of this is the police headquarters block, which fronts onto an enlarged Salisbury Square. The commercial block is situated further to the south. New east/west routes are envisaged between the blocks, linking to a further new lane to St. Bride's Church (St. Bride's Avenue).

The architecture of the courts building is rooted in classical proportions, with a central portico and symmetrical composition. The base of the building comprises six storeys with a further two storeys set back at roof level. The overall height is 53m. Materials are Portland limestone with a granite base. Metal windows are set behind deep limestone reveals. The proposed new courts building would be attached to the retained Grade II listed building at Nos. 2-7 Salisbury Court (proposed for A3 use).

The proposed police headquarters building is located directly south of the courts building, on the site of Fleetbank House and outside the boundaries of the conservation area. The architecture of this building takes a different approach from that of the courts building. It is the tallest in the group at 63m (ten storeys), and based on a rigid grid of large openings framed in weathered steel with ceramic spandrels around the windows. A large open ground floor fronts onto an enlarged and re-landscaped Salisbury Square.

The size of the square is proposed to be increased through the demolition of the replica Queen Anne/Georgian house at No. 1 Salisbury Square and the narrow late 19th or early 20th century warehouse at No. 8 Salisbury Court. This would also necessitate the creation of an exposed southern elevation to the Grade II listed building at Nos. 2-7 Salisbury Court, as this building was historically attached to No. 8.

Further south, and outside the conservation area, is the proposed commercial block, which reduces in height to 47m in order to preserve the view of the tower of St. Bride's Church from Waterloo Bridge. The building is comprised of a double height ground floor with seven storeys of office accommodation above. Materials are unglazed terracotta and polished concrete.



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Telephone 020 7973 3700
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The impact of the proposals described above on the significance of designated heritage assets relates to Fleet Street Conservation Area. In addition to the harm caused to the conservation area by the loss of six buildings which contribute to the significance of that area, 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.

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.

The development would have a major impact on the character and appearance of this part of the conservation area.

When considering this impact in the context of the significance of the Fleet Street Conservation Area as a whole (as you are required to do by the NPPF), it is relevant that it is on a relatively small part. However, this part is evocative of the whole conservation area and makes an important contribution to its overall significance. Whilst the proposals would cause a moderate degree of harm to that overall significance, we regard this harm as very serious.

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.

Relevant policy

Section 72 of the Act requires Local Planning Authorities to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

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

Paragraph 193 states that when considering the impact of a proposed development on a heritage asset (which includes its setting), local planning authorities should give 'great weight' to preserving the asset's significance. Any harm or loss should require clear and convincing justification (paragraph 194).



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

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

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

Historic England position

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.

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.

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).

Such harm requires clear and convincing justification, and should be 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).

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,



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

Telephone 020 7973 3700
HistoricEngland.org.uk



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.

Recommendation

Historic England objects to the application on heritage grounds.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

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

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

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

Yours sincerely

Michael Dunn

Principal Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



Historic England



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

Telephone 020 7973 3700
HistoricEngland.org.uk



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City of London Conservation Area Advisory Committee

Department of the Built Environment,
Corporation of London,
P.O. Box 270,
Guildhall,
London EC2P 2EJ

9th February 2021

Dear Sir/Madam,

At its meeting on 4th February 2021 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

**C.11 20/00997/FULEIA - Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars St, London EC4Y
Whitefriars & Fleet Street Conservation Area/Castle Baynard Ward. No Ward Club rep.**

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). This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Copies of a CD containing the Environmental Statement may be obtained from Edward Kitchen at Gerald Eve LLP at EKitchen@geraldev.com.

In arriving at its decision, the Committee had considered the very detailed presentation by the architects and acknowledged that, other than the Fleet Street range, most of the site under consideration was outside the Conservation Area. The demolition of 69 Fleet Street was considered to be a potential enhancement to the Conservation Area, as was the setting of the Lutyens-designed 85 Fleet Street and the opening up of an east/west axis which allowed new views of the Grade 1 St Bride's Church, Fleet Street. The Committee noted that the proposal involved a departure from one or more policies of the development plan in force in the area and that the other unlisted buildings proposed for demolition had been given immunity from listing indicating that English Heritage had been involved. The Committee was pleased to see that the listed and attractive Queen Anne-style 2 – 7 Salisbury Court was to be sensitively restored and repurposed.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,

Mrs. Julie Fox
Secretary

Adjei, William

From: PLN - Comments
Subject: FW: Comments on Planning Application 20/00997/FULEIA

From: Dan Langan
Sent: 16 February 2021 11:48
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Comments on Planning Application 20/00997/FULEIA

I write as a resident of Wine Office Court, off Fleet Street, in response to the proposals set out in Planning Application 20/00997/FULEIA, summarised in a letter dated 19 January 2021.

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.

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.

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 nighttime hours, and strongly support St Bride's in their request that this approach be upheld by Condition, should the City resolve to grant permission.

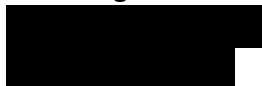
I have a general comment in addition. Although I can see the desirability of retail space behind the Court and Police buildings, I would question the need for additional office space. Presumably, the plans were originally proposed prior to the completion of Brexit, COVID-19, the estimated 10% exodus 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.

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.

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.

Kind regards

Dan Langan



From: [Hegarty, Patrick](#)
To: [PLN - Comments](#)
Subject: 20/00997/FULEIA - Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars St London, EC4Y
Date: 16 February 2021 19:06:16

Dear Catherine,

Thank you for the opportunity to comment on this application.

In general, we welcome these proposals which include high quality planting opportunities and a commitment to greening the public realm and the buildings. In particular we welcome the enlarged public realm of Salisbury Square and the extent of carefully designed planting across the site.

Existing trees – There are four existing trees in Salisbury Square which are subject to statutory protection as they are within the Fleet Street Conservation Area. In addition, there are five trees on the Whitefriars Street elevation of the site. Whilst none are significant specimens, they collectively contribute to a significant mass of greening. It is important that the comprehensive redevelopment of the site responds by contributing a greater canopy of greening than will be lost. The proposals show a range of planting including re-landscaping of Salisbury Square, green walls and roof gardens.

We have specific issues which need to be addressed.

We do not agree with putting the narrow water feature troughs in the North Passage between the Courts building and the Police building. These add little amenity and would have high maintenance requirements. They would have little or no biodiversity value and would have to be regularly treated with chemicals. The integrating of water features and vents is potentially a risk regarding leaks and split responsibilities. Perhaps seating would offer greater amenity in this location.

There are changes we would require to the details of the works associated with the planting in the public realm to bring it in line with our detailing in the City's Technical Manual, (presuming the public realm is to be maintained by the Open Spaces Department and planting associated with the buildings such as green walls, climbers and podium garden to be maintained as part of the building maintenance). I emphasise these are details, such as the specification for tree planting pits in paved areas and tree sizes. – We would insist on the top of the tree root ball depth being planted at approximately ground level with resulting changes to the support and detailing of the paving around the tree. (Conflicting with Drg.674.02.110) Also, there is a preponderance of multi stemmed trees in the planting in Salisbury Square and the opportunity should be taken to introduce single stemmed trees which can eventually provide more stature (given the removal of existing mature trees) and greater carbon capture in future years.

UGF - Is the applicant including trees and planting not on their building but on public open space, within their calculation, albeit within the red line of the application?

We would discourage the addition of beehives to the roof terraces as, counterintuitively this can be bad for wildlife in the city, as introduced bees compete for forage with existing and native bees.

Specialist advice should be taken on the feasibility, plant selection and maintenance requirements for the proposed heliostat wintergarden/Podium Garden.

Regards

Patrick

Patrick Hegarty

Technical Manager

Open Spaces Department

City of London Corporation

Tel: 07956 435 811

Email: patrick.hegarty@cityoflondon.gov.uk

Address PO Box 270, Guildhall, London, EC2P 2EJ

THE VICTORIAN SOCIETY

The champion for Victorian and Edwardian architecture

Ms Catherine Evans
The Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Your reference: 20/00997/FULEIA,
20/00996/LBC, & 20/00998/LBC
Our reference: 163343, 163344, &
163345

PLNComments@cityoflondon.gov.uk
catherine.evans@cityoflondon.gov.uk

2 February 2021

Dear Ms Evans,

RE: Land Bounded by Fleet Street, Whitefriars Street and Salisbury Court, London, EC4Y 8AA (2–7 Salisbury Court: Grade II, *Alexander Peebles*, 1878; *Waithman Obelisk*: Grade II, 1833); a) Demolition of existing buildings ... ; b) Part demolition of 2-7 Salisbury Court (Grade II) and carrying out of works including remodelling at roof level, formation of new façade to south elevation, part new façade 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 ... 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

Thank you for notifying the Victorian Society of this application. We **object** to the proposals and would like to offer our comments.

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.

Significance

Although we do not want to offer our own exhaustive account of the significance of the site and its buildings, we think your authority should bear in mind the following:

i) Conservation Area and COIs. We were consulted by Historic England about the applications for Certificates of Immunity from Listing (COIs) for the buildings on the site that fall within our remit (1837–1914). We agreed with the inspector's conclusions that none of the buildings met the criteria for

Patron
HRH The Duke of Gloucester KG, GCVO
President
Griff Rhys Jones
Chair
Professor Hilary Grainger

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The Lord Howarth of Newport CBE
Sir Simon Jenkins
Fiona MacCarthy OBE

1 Priory Gardens, London W4 1TT
Telephone 020 8994 1019
admin@victoriansociety.org.uk
victoriansociety.org.uk

statutory designation. We must remind your authority, however, that this does not mean that the buildings make no contribution to the historic environment, or that they are necessarily not worthy of retention in whole or in part. Almost all the buildings on the site both have significance in themselves and make a contribution to the significance of the Fleet Street Conservation Area. Many of these buildings also make a clear contribution to the setting of listed buildings nearby.

The former bank at 80–81 Fleet Street is of particularly high quality, and its significance should be considered carefully. We were not consulted about the COI application for this building because it falls out of our remit; whilst we defer to the opinion of Historic England about its listability, we must emphasise that it is nonetheless a fine, solid expression of a rather Edwardian classicism — it looks old-fashioned for its mid-20s date — and that it makes a positive contribution not only to the character of the Fleet Street Conservation Area.

ii) Scale and Grain. Setting aside the detailed architectural qualities of the existing buildings on the site, it is important to note that many of them play a vital role in sustaining the characteristic scales and grain of the city-scape. This part of Fleet Street has largely escaped the huge inflation of scale that characterises the built environment in other parts of the City. Its buildings are relatively narrow, and although many step up as they step back, their typical height at the pavement line is relatively modest. The impression is of small- to mid-scale buildings which respond to the constraints of their historically narrow plots. The existing buildings contribute to this impression, especially those on Salisbury Court and the two historic buildings on Whitefriars Street. Even the buildings on Fleet Street itself maintain a clear articulation of the block into three; their strong vertical articulation adds to the impression of relative narrowness, even in buildings of some width.

iii) The setting of 2–7 Salisbury Court. 2–7 Salisbury Court is the surviving part of a fine range of buildings by Alexander Peebles. The significance of these buildings in themselves is dealt with well in the application, and I will write about the proposals below. It is important to note here, however, that the setting of these buildings does make a positive contribution to their significance, and that harm to this setting must be assessed and taken into account.

Most strikingly, the buildings to either side of 2–7 Salisbury Court contribute to its significance by giving it a context in which its design makes sense. To the south, 8 Salisbury Court and the side elevation of 1 Salisbury Square emphasise the narrow plot widths which Peebles' range both mimics, with its strong vertical emphases, and transcends, with its coherent, unified, and originally symmetrical design across the whole length of its façade. To the north, the return elevation of 80–81 Fleet Street marks a large transition in scale, but negotiates this transition with some tact. Whereas the absolute height difference between the two buildings is large, the difference in the cornice line is barely two full storeys; although the styles and materials of the two buildings are different, they share a language of vertical divisions, heavy mouldings, and applied ornament. The transition between the two is made deliberately neater by a single bay at the scale of 2–7 Salisbury Court but in the style of 80–81 Fleet Street. This bay has been entirely omitted from the existing elevations (specifically, it is absent from drawing FSE-EPA-MP-ZZ-EL-A-000320). The context the adjacent buildings give to 2–7 Salisbury Court thus makes legible both the historic grain to which the listed buildings were a response, and the later developments to which it, in turn, offered a challenge.

iv) Waithman memorial. By date of construction (1833) this memorial is out of our remit; however, it formed the centre-piece for Ludgate Circus for more than a century and we consider it an important piece of the Victorian cityscape. The Planning Heritage Statement gives a good account of Waithman's significance, and a thorough bibliography. He was an important parliamentarian and an outspoken and persistent supporter of reform, and he campaigned tirelessly for rights and protections which we now consider fundamental. His friends and contemporaries considered him worthy of the honour of an extremely public monument; although it has been moved twice, and, in its current position, is much less prominent than it was historically, Waithman's obelisk is still a centre-piece of sorts. Designed to be the focal point of a key crossroads in the City, some of its significance relates to its central position in a public space.

Harm

Bearing in mind those aspects of significance emphasised above, we offer the following comments.

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 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.

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.

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.

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 decontextualising 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 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.

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.

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.

Advice

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 prevailing scales and grain of the Fleet Street conservation area.

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.

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.

Policy

We must remind your authority of the NPPF, paragraph 194, which 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.' In this case the principle of providing a new centre for the City of London Police and a new court building for financial cases has clear public benefits attached and is beyond our remit to question. It is the chosen design approach, however, that will cause harm to significance, and this remains insufficiently justified.

We would also like to remind your authority of the following pertinent parts of your own planning policies, as stated in the City of London Local Plan (2015).

— Core Strategic Policy CS10: Design:

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

1. Ensuring that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.

...

5. Ensuring that new development respects and maintains the City's characteristic network of streets and alleyways. (p. 91)

— Development Management Policy DM10.1 elaborates further that new development should

avoid harm to the townscape and public realm, by ensuring that ... 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. (p. 92)

— Core Strategic Policy CS12: Historic Environment:

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, by:

1. Safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses.

2. Preserving and enhancing the distinctive character and appearance of the City's conservation areas, while allowing sympathetic development within them. (p. 108)

— Development Management Policy DM 12.1: Managing change affecting all heritage assets and spaces:

1. To sustain and enhance heritage assets, their settings and significance.

...

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings. (p. 109)

Finally, Development Management Policy DM 12.2 asserts that 'development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area' and that 'the loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.'

The current proposals are in conflict with all of the above policies, and we therefore urge your authority to withhold consent and seek major revisions. I would be very grateful if you could keep me up to date with any revisions to the proposals, and if you could inform me of your decision in due course.

Yours sincerely,

Tom Taylor

Conservation Adviser

From: [Evans, Catherine](#)
To: [DBE - PLN Support](#)
Subject: FW: Planning application consultation (20/00997/FULEIA)
Date: 23 February 2021 17:35:47
Attachments: [image001.png](#)
[image002.png](#)



COVID 19: CITY STREETS

We have made some temporary changes to Square Mile streets to enable social distancing and provide more space for walking and cycling.

Complete our survey to tell us what you think.



BEECH STREET ZERO EMISSIONS SCHEME

We have introduced temporary changes on Beech Street, Bridgewater and Golden Lane with the aim of reducing air pollution.

Complete our survey to have your say on these changes.

From: Jeremy B <jeremy91282@cpni.gov.uk>
Sent: 23 February 2021 17:35
To: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>
Cc: Bush, Beverley <Beverley.Bush@cityoflondon.gov.uk>
Subject: RE: Planning application consultation (20/00997/FULEIA)

Dear Catherine,

Thank you for your email and invitation to comment. It is not within our usual remit to comment on planning applications and, therefore, I will not be commenting.

Best regards

Jeremy

From: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>

Sent: 23 February 2021 17:26

To: Jeremy B <jeremy91282@cpni.gov.uk>

Cc: Bush, Beverley <Beverley.Bush@cityoflondon.gov.uk>

Subject: Planning application consultation (20/00997/FULEIA)

Dear Jeremy,

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

I am writing regarding the above planning application.

I would be grateful if you could contact me by 1st March 2021 if you are intending to comment on the application.

Best wishes,
Catherine

Catherine Evans

Senior Planning Officer

Department of the Built Environment

City of London

020 7332 1352

07842 601194

www.cityoflondon.gov.uk



COVID 19: CITY STREETS

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Chief Planning Officer and Development Director
Department of the Built Environment
City of London
PO Box 270,
Guildhall,
London EC2P 2EJ
For the attention of Catherine Evans

17 February 2021

Dear Ms Evans,

Salisbury Square Redevelopment Planning Application 20_00997_FULEIA_

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.

I hope that this update is helpful. In the meantime, should you have any queries or would like to discuss matters further, please do not hesitate to contact me.

Yours sincerely

Greg Dowden

This note summarises key details in the Circular Economy Statement submitted to the City of London Planning Authority as part of the Salisbury Square Development planning application (reference '20/00997/FULEIA') in relation to different elements of the Proposed Development. The key elements of the Proposed Development include the new buildings (Court Building, Police Building and Commercial Building), refurbished building (Listed Building and the public realm).

Key strategic approach / commitment	Court Building	Police Building	Commercial Building	Listed Building	Public Realm
Substructure	<ul style="list-style-type: none">Minimising material with piling solution that allows the use of a single piles.		<ul style="list-style-type: none">The void of the existing basement of Fleetbank House will form part of the basement for the Commercial Building, benefitting from less excavation.	<ul style="list-style-type: none">The existing 2-7 Salisbury Court basement will be retained as the basement for the refurbished building, avoiding the need for excavation.	<ul style="list-style-type: none">Reuse of materials of the existing buildings without downcycling them.There is an intention (subject to confirming feasibility and performance testing) to reclaim the Portland stone, limestone and marble façades without downcycling the materials for on-site and/or off-site, for external public paving and leftover bits of cladding or excess stone crushed and used as an aggregate in terrazzo mix for planters.
	<ul style="list-style-type: none">Use of recycled aggregates for the substructure.Use of 70% GGBS cement replacement to all the vertical structures (columns, walls, core), firm secant piles and concrete blinding and 50% GGBS cement replacement to all other concrete elements.			Not applicable.	
Superstructure: façade	<ul style="list-style-type: none">Durable materials have been used for the cladding of the Proposed Development to eliminate the need of replacement. This will reduce the demand for raw materials to replace the façade during the life of the building.	<ul style="list-style-type: none">Use of unitised façade system for the Commercial and the Police Buildings.		<ul style="list-style-type: none">Retaining the east elevation and part of the west elevation.	Not applicable.
Superstructure: structural systems	<ul style="list-style-type: none">Use of 70% GGBS cement replacement to all the vertical structures (columns, walls, core), firm secant piles and concrete blinding and 50% GGBS cement replacement to all other concrete elements.Standardising ceiling heights to minimise the used material and explore the possibilities of creating an adaptable building structure. The proposed floor to ceiling heights are:<ul style="list-style-type: none">Police Building: 2,775 mm;Court Building: 3,700 mm;Commercial Building: 2,800 mm.			<ul style="list-style-type: none">Reuse of metal columns.	
	<ul style="list-style-type: none">The grid for the Court Building varies due to the building's specialist requirements.	<ul style="list-style-type: none">There are standardised structural grids for the Police Building (12mx12m) and the Commercial Building (6mx12m), which provide large and flexible spaces.			
Services	<ul style="list-style-type: none">The ventilation requirements of the Court and Police Buildings will be designed with additional capacity to allow for future needs.		-	<ul style="list-style-type: none">The risers have been sized to provide additional mechanical ventilation.	
	<ul style="list-style-type: none">Capability for heating plant to be replaced by cooling plant.The risers have been sized to provide additional mechanical ventilation.				
Demolition Waste	<ul style="list-style-type: none">A Pre-refurbishment and demolition audit has been undertaken, to identify the opportunities to reclaim and recycle components and materials. According to the Pre-refurbishment and demolition audit the key demolition products are concrete (almost 70% by weight), brick, stone and metal. There is an intention to reclaim the Portland stone, limestone and marble façades without downcycling the materials for on-site and/or off-site. Requirements for the Demolition Contractor have been produced for the implementation of the recommendations for reclamation and reuse of materials from the buildings as identified in the Pre-refurbishment and demolition audit.				
Excavation Waste	<ul style="list-style-type: none">In collaboration with the demolition contractors, it is intended that, in line with the new draft London Plan policy, 95% of non-hazardous waste is diverted from landfill.			Not applicable.	<ul style="list-style-type: none">This is in accordance with the targets for the Court Building, Police Building and Commercial Building.
Construction Waste	<ul style="list-style-type: none">Effective segregation of these materials will lead to a potential recycling or recovery rate of at least 95%, in line with the draft new London Plan, Policy SI 7 'Reducing waste and supporting the circular economy.'				
Municipal Waste	<ul style="list-style-type: none">An Operational Waste Management Plan (OWMP) has been prepared. Waste facilities are integrated into the design of the buildings of the Proposed Development, and allow for the separate storage and collection of recyclable materials, including residual waste, mixed recyclables, organics, paper/card and glass.A minimum of 65% of municipal waste generated by the Proposed Development will be diverted from landfill for reuse, recycling or recovery in line with the draft new London Plan, Policy SI 7 'Reducing waste and supporting the circular economy.' Refer to the Operational Recycling & Waste Management Strategy for further details.				
End-of-Life	<ul style="list-style-type: none">In line with Circular Economy principles, the main priority is to extend the lifetime of the buildings through careful design and specification through the measures listed above. A 'Disassembly Guide' will be developed 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.				
Procurement	<ul style="list-style-type: none">A Sustainable Procurement Plan has been produced prior to RIBA 2 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.				



February 19th 2021

Planning Application Consultation: 20/00997/FULEIA New Combined Court Fleet Street and Police Station - Salisbury Square

Dear Ms Evans

I write to comment on the proposed planning application referenced above.

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.

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.

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.

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.

Church services and events are highly sensitive to disruption from noisy building works, the key times for the Church are all day Sunday (for 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.

I propose that the following conditions be imposed if planning permission is granted:

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 applicant should consult with the church to ensure disruption is minimised and provide a contact for the church to use if problems do arise.

The new buildings must use consolidated deliveries as a planning condition to minimise traffic entering the area during peak times after development is complete.

Noisy construction work on Sundays and Saturday afternoons should not be permitted.

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.

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.

Yours sincerely

A solid black rectangular box used to redact the signature of Graham Packham.

Graham Packham CC

Ward Member Castle Baynard

Begum, Shupi

From: BCTAdmin@thameswater.co.uk
Sent: 26 February 2021 14:20
To: Pln - CC - Development Dc
Subject: 3rd Party Planning Application - 20/00997/FULEIA- updated

Corporation of London
Department of Planning & Transportation
PO Box 270
Guildhall
London
EC2P 2EJ

Our DTS Ref: 64437
Your Ref: 20/00997/FULEIA- updated

26 February 2021

Dear Sir/Madam

Re: FLEETBANK HOUSE 2-6, SALISBURY SQUARE, LONDON, -, EC4Y 8JX

Waste Comments

Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

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.

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. "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 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%7Cad557ecb8bbe4e5fd0c708d8da61b624%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637499460484979979%7CUnknown%7CTWFpbGZsb3d8eyJWljoIMC4wLjAwMDAiLCJQIjoiV2luMzliLjBjBTIiLCJ6Ijoi6IklhaWwWlCjXVCI6Mn0%3D%7C1000&data=HMUON6boIS7i%2FWwrOIORvsdKJeQ2hukAAHhYZHIH1Hs%3D&reserved=0>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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%7Cad557ecb8bbe4e5fd0c708d8da61b624%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637499460484979979%7CUnknown%7CTWFpbGZsb3d8eyJWljoIMC4wLjAwMDAiLCJQIjoiV2luMzliLjBjBTIiLCJ6Ijoi6IklhaWwWlCjXVCI6Mn0%3D%7C1000&data=HMUON6boIS7i%2FWwrOIORvsdKJeQ2hukAAHhYZHIH1Hs%3D&reserved=0>.

Water Comments

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. 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.

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%7Cad557ecb8bbe4e5fd0c708d8da61b624%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637499460484979979%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCI6Mn0%3D%7C1000&sd=HMUON6boIS7i%2FWwrOIORvsdKJeQ2hukAAHhYZHIH1Hs%3D&reserved=0>

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://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%7Cad557ecb8bbe4e5fd0c708d8da61b624%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637499460484979979%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikl1haWwiLCJXVCI6Mn0%3D%7C1000&sd=HMUON6boIS7i%2FWwrOIORvsdKJeQ2hukAAHhYZHIH1Hs%3D&reserved=0>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Yours faithfully

Development Planning Department

Development Planning,

Thames Water,

Maple Lodge STW,

Denham Way,

Rickmansworth,

WD3 9SQ

Tel:020 3577 9998

Email: devcon.team@thameswater.co.uk

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VCI6Mn0%3D%7C1000&data=T2hE65uH4CG%2F7ZofjK5hFYUqdBAXh%2BOaemjKvORWW0U%3D&reserved=0 , follow us on twitter
<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.twitter.com%2Fthameswater&data=04%7C01%7C%7Cad557ecb8bbe4e5fd0c708d8da61b624%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637499460484979979%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C1000&data=GLGWzKmil7YzKMhRgQ4aYjW8%2F2vz0du4JLhm4BBSILU%3D&reserved=0> or find us on
<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.facebook.com%2Fthameswater&data=04%7C01%7C%7Cad557ecb8bbe4e5fd0c708d8da61b624%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637499460484979979%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCi6Mn0%3D%7C1000&data=U6EfoI7NT%2B2i7wmZjDfuFNacYnFbk%2BFscYRjAvU9o%3D&reserved=0>. We're happy to help you 24/7.

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SOUTHWARK COUNCIL

LBS Registered Number: 21/OB/0008

Date of issue of this decision: 02/03/2021



www.southwark.gov.uk

LBS Reg. No.: 21/OB/0008
Your Ref No.:

Date of Issue of Decision: 02/03/2021

Applicant Ms C Evans
 City of London

With reference to your consultation on the following development:

Observations to the City of London on planning application
20/00997/FULEIA for:

- 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

DECISION NOTICE

LBS Registered Number: 21/OB/0008

Date of issue of this decision: 02/03/2021



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Waithman obelisk within
Salisbury Square;
g) Other associated and ancillary works and structures.

At Land Bounded By Fleet Street, Salisbury Court, Salisbury Square,
Primrose Hill & Whitefriars St London, EC4Y

In accordance with your letter received on 20 January 2021 and supporting documents.

The Council's formal response is

1. "No formal objection is raised to the proposed development but the Council wishes to make the following comments:

Design:

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.

Transport:

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:

- 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.
- The evaluation of the impact on highway/public transport and pedestrian/cyclist conditions should include improvement measures where deficiencies are identified.
- Measures to assist the mobility-impaired pedestrians/cyclists and the cycle parking provision should meet the New London Plan standard.

The following should also be secured:

DECISION NOTICE

LBS Registered Number: 21/OB/0008

Date of issue of this decision: 02/03/2021



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- Construction management plan;
- Delivery and service management plan and;
- Car parking management plan detailing the provision of adequate disabled car parking spaces even if no other car parking provision is proposed.

Signed: *Simon Bevan*

Director of Planning

Site address: Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars St London, EC4Y

Reference: 21/OB/0008

Planning Division
Southwark Council
Chief Executive Department
PO Box 64529 London SE1 5LX

Planning.applications@southwark.gov.uk ;

WLC Memo: GLA Consultation

Case details

Date of first review:	01/03/2021
	Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street
Case Name:	
Case Number:	2021/0155
Case Officer:	Andrew Payne
London Borough:	City of London
Application Type (Outline/Hybrid/Detailed):	Detailed
Applicant:	City of London Corporation
Energy Consultant:	AECOM
Document Title:	Whole Life-Cycle Carbon Assessment
Document Date:	Dec-20

Development proposals

Use	Floorspace (m2)/Number of units
F1 (court facility)	14,556
Sui generis (police)	17,067
E (commercial)	11,357
Sui generis (listed drink, food)	1,145
Shared	4,121

- 1 **London Plan** : The Mayor has published his new London Plan which includes new carbon, energy and heat risk policies (See Policies SI 2, SI 3 and SI 4).

- 2 **Guidance** Applicants should follow the GLA 'Whole Life-Cycle Carbon Assessments Guidance - draft for consultation' 2020 and the GLA WLC assessment template (<https://consult.london.gov.uk/whole-life-cycle-carbon-assessments>) which should be completed in full. These documents set out the information that should be provided within the Whole Life-Cycle Carbon Assessments to be submitted at Stage 1.

Applicants should ensure they are familiar with the new guidance in preparation for submitting their planning application.

- 3 The following comments summarise key points for you to be aware of in progressing your responses for Whole Life-Cycle Carbon Assessment principles at the detailed planning stage, but you should refer to the guidance for full details.

General compliance comments

- 4 The applicant has provided all information within the project details section of the template under the Detailed planning stage, in line with the GLA Whole Life-Cycle Carbon Assessment guidance document.
- 5 The assessment method stated does conform with BS EN 15978 and 'RICS Professional Statement and guidance, Whole Life carbon assessment for the built environment' (RICS PS) as set out in the GLA Whole Life-Cycle Carbon Assessment guidance document.
- 6 The assessment has been with a reference study period of 60 years.

- 7 The software tool used is as per the list of suitable software tools in Appendix 1 of the GLA Whole Life-Cycle Carbon Assessment guidance document and does align with the software tool used at the outline planning stage.

- 8 The source of carbon data for materials and products, and EPD database stated within the assessment does come from acceptable sources as set out in the GLA Whole Life-Cycle Carbon Assessment guidance document.

Estimated WLC emissions (Assessment 1)

- 9 The applicant has provided results that cover all of the main lifecycle module groups (A1-A5, B1-B5, B6-B6, C1-C4 and D).

- 10 The applicant **has not** provided results that fall within the WLC benchmarks and has reasonably explained the reasons for any divergences from the WLC benchmark. **The applicant should explore further carbon reduction options and submit updated results.**

- 11 The applicant **has not** completed the assessment 1 template table completely and all results **do not seem** within a reasonable range. Please could the applicant clarify the following: **Assessment 1 module D for the court building does not seem correct in the template but looks reasonable in the report. The applicant should complete the template for the Listed Building based on a site specific assessment.**

Estimated WLC emissions (Assessment 2)

- 12 The applicant has provided results for assessment 2 which account for decarbonisation for both embodied carbon emissions (not including module A1-A5) and for operational carbon (B6).

- 13 The applicant has completed the assessment 2 template table completely and all results do seem within a reasonable range.

Key action and further opportunities to reduce whole life-cycle carbon emissions

- 14 The applicant has provided details of the site opportunities and any constraints in reducing WLC emissions
- 15 The applicant has provided an estimation of the WLC reduction (kgCO₂e/m² GIA) for all actions and further potential opportunities stated within the template.

Material Quantity, assumptions and end of life scenarios

- 16 The applicant has completed the material quantity and end of life scenarios table in full
- 17 All material types and quantities have been provided for all the applicable building element categories and align with the Assessment 1 and Assessment 2 tables.
- 18 Assumptions made with respect to maintenance, repair and replacement cycles (Module B) have been stated.
- 19 Assumptions made with respect to maintenance, repair and replacement cycles (Module B) have been based on bespoke building assumptions rather than default figures such as those found in the RICS PS.
- 20 Material 'end of life' scenarios (Module C) has been filled out for all applicable significant materials and does align with the projects separate Circular Economy Statement
- 21 The applicant has provided and estimated mass (kg) of reusable and recyclable materials for each building element category

GREATER **LONDON** AUTHORITY

Circular Economy: GLA Consultation

Case Details

1	Development Name	Land Bounded by Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street
2	Applicant	City of London Corporation
3	Case Officer	Andrew Payne
4	London Borough	City of London

Planning Application: Proposal

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

Planning Application: Uses - Floorspace

1	F1 (court facility)	14,556	m ²
2	Sui generis (police)	17,067	m ²
3	E (commercial)	11,357	m ²
4	Sui generis (listed drinking, food)	1,145	m ²
5	Shared	4,121	m ²

GLA STAGE 1

Document Information

1	Date of Review	01.03.21	Date of Applicant's Response	
2	Document Title	Detailed Circular Economy Statement		
3	Author	AECOM		
4	Document Date	Dec-20		

GLA Stage 1 Comments

Applicant's Stage 1 Response

No	Title	Description	Action Required	Description
0	Overall Commitment	It is welcomed that the applicant has submitted a Circular Economy Statement in advance of the Plan being formally adopted.	Nothing further is required	
1	Description of the Development	The applicant has provided description of the development and has provided the proposed gross internal floor area (GIA).	Nothing further is required	
2	Strategic Approach	The applicant has summarised the Strategic Approach to the project in Table 1 and has provided a supporting narrative in the statement.	Nothing further is required	
3	Key commitments	The applicant has summarised the Key Circular Economy Commitments in Table 2 and has provided a supporting narrative in the Statement.	Nothing further is required	
4	Bill of Materials	The applicant has provided a Bill of Materials including kg/m ² for the proposed new development and has confirmed that reused or recycled content will be 20 per cent.	Nothing further is required	
5	Recycling and Waste Reporting	The applicant has completed the Recycling and Waste Reporting table and has committed to achieving the policy targets of reusing/ recycling/ recovering 95 per cent of construction and demolition waste, and putting 95 per cent of excavation waste to beneficial use.	Nothing further is required	
5	Recycling and Waste Reporting	The applicant has provided a notification of the likely destination of all waste streams (beyond the Materials Recycling Facility). The applicant has not provided a written confirmation that the destination landfill(s) has/have the capacity to receive waste.	Nothing further is required	This information will become available after the demolition contractor and lead contractor are appointed and the project team will ensure that the demolition contractor and lead contractor provide this information once they are appointed.
5	Recycling and Waste Reporting	The applicant has undertaken a Pre-Demolition Audit to identify components of the building that can be retained / reused.	Nothing further is required	
6	Operational waste	The Applicant has demonstrated how much operational waste the proposal is expected to generate.	Nothing further is required	
6	Operational waste	The Applicant has shown that waste will be managed in accordance with the waste hierarchy.	Nothing further is required	
6	Operational waste	The development is designed with adequate, flexible, and easily accessible storage space.	Nothing further is required	
6	Operational waste	The development supports the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass).	Nothing further is required	
6	Operational waste	The development supports the separate collection of food waste.	Nothing further is required	
6	Operational waste	The Applicant shows how [operational] performance will be monitored and reported.	Nothing further is required	

GLA Consultation - Circular Economy

6	Operational waste	The Applicant makes a commitment to ensure that there is zero biodegradable or recyclable waste to landfill by 2026.	Nothing further is required	
6	Operational waste	The Applicant has included a commitment to meet or exceed the municipal waste recycling target of 65 per cent by 2030. This is demonstrated by waste arisings tonnage and composition.	Nothing further is required	
6	Operational waste	The Applicant shows that a 75% recycling rate for businesses by 2030.	Nothing further is required	
7	Plans for implementation	The applicant has provided Plans for Implementation including specific plans for achieving short- and medium-term targets and commitments; and the programme / method for achieving longer-term targets.	Nothing further is required	
8	End-of-life strategy	The applicant has provided a brief End-of-Life Strategy for how the building materials, components and products will be disassembled and reused at the end of their useful life.	Nothing further is required	
9	Appendices	The applicant has provided appendices or as a cross reference to some of the supporting information.	Nothing further is required	
10	Post Completion Report	<p>The applicant is required to submit a Post Completion Report to the relevant local authority and the GLA at ce&wastestatement@london.gov.uk.</p> <p>It is required that the Post Completion Report sets out the predicted and actual performance against all numerical targets, and provides updated versions of Tables 1 and 2, the Recycling and Waste Reporting form and Bill of Materials.</p>	Nothing further is required	City of London (CoL) Corporation, as the Applicant to provide a Post Completion Report to the Greater London Authority.

From: [Evans, Catherine](#)
To: [DBE - PLN Support](#)
Subject: FW: SSD - plaques
Date: 10 March 2021 16:57:57
Attachments: [image001.png](#)
[image002.png](#)
[FSE-EPA-CT-ZZ-EL-A-051384.pdf](#)
[D220 East elevation, repairs and materials as proposed.pdf](#)

From: Stubbs, Kathryn <Kathryn.Stubbs@cityoflondon.gov.uk>
Sent: 09 March 2021 13:41
To: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>; Bush, Beverley <Beverley.Bush@cityoflondon.gov.uk>; Parker, Joanna <Joanna.Parker@cityoflondon.gov.uk>; Raw, Ruby <Ruby.Raw@cityoflondon.gov.uk>
Subject: FW: SSD - plaques

I don't have any comments on the proposed plaque and TP O'Connor locations. The details of dismantling, storage and fixing can be dealt with by the standard condition.

Kathryn

Kathryn Stubbs
Head of Archaeology and the Historic Environment
Department of the Built Environment
City of London

020 7332 1447
www.cityoflondon.gov.uk

From: Jeremy Randall <JRandall@geraldeva.com>
Sent: 08 March 2021 19:36
To: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>
Cc: Bush, Beverley <Beverley.Bush@cityoflondon.gov.uk>; Stubbs, Kathryn <Kathryn.Stubbs@cityoflondon.gov.uk>; Parker, Joanna <Joanna.Parker@cityoflondon.gov.uk>; Raw, Ruby <Ruby.Raw@cityoflondon.gov.uk>; Edward Kitchen <ekitchen@geraldeva.com>; Sophie Hardy <SHardy@geraldeva.com>
Subject: SSD - plaques

Catherine,

Further to recent discussions, please find attached a new EPA drawing and an updated RGA drawing which highlight the proposed locations for the plaques and the TP O'Connor bust found on the existing buildings.

The plaque and bust on 2-7 Salisbury Court are highlighted by the annotations M2 and M3. The plaques on the Court building are hopefully clear.

If these locations are agreeable, we will look to formally submit these drawings now, with the suggestion that details of storage and fixings etc can be secured by planning condition.

Kind regards,

Jeremy

Jeremy Randall
Partner

Tel. [+44 207 333 6328](tel:+442073336328)
Mobile. [+44 776 861 7235](tel:+447768617235)
JRandall@geraldeve.com

Gerald Eve LLP
72 Welbeck Street
London W1G 0AY
www.geraldeve.com



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Energy Memo: GLA Consultation

Case details

Date of first review:	09/03/2021
Case Name:	Salisbury Square, Primrose Hill & Whitefriars Street, London, EC4Y
Case Number:	2021/0155
Case Officer:	Andrew Payne
London Borough:	City of London
Application Type (Outline/Hybrid/Detailed):	
Applicant:	City of London Corporation
Energy Consultant:	AECOM
Document Title:	Salisbury Square Development
Document Date:	Dec-20

Development proposals

Use	Floorspace/Number of units
Court building (F1)	12,863 m2
Police HQ (Sui generis)	12,134 m2
Commercial	10,197 m2
Pub (Refurbishment)	905 m2

Compliance Schedule - Applicant to provide references in cells D7-D20 and values within cells D23-32. GLA Energy Officers to populate all other cells.

Required Information	Status	Document reference/location - to be provided by applicant	GLA Comment Reference
Energy Statement	Received but items still outstanding		
Confirmation of carbon emission factors used	Received and nothing further required		
GLA carbon emission reporting spreadsheet v1.2	Received and nothing further required		
Details of energy efficiency measures	Received but items still outstanding		
Supporting Modelling Outputs (BRUKLs/DER Worksheets)	Received and nothing further required		
Compliant overheating mitigation strategy	Received but items still outstanding		
Completed GHA overheating tool	N/A		
Details of heating strategy	Received but items still outstanding		
Futureproofed DHN connection drawings	Not yet received - applicant to submit and provide reference --->		
Site heat network drawings	Not yet received - applicant to submit and provide reference --->		
Roof Layout detailing PV proposal	Received and nothing further required		
Draft S106 wording of carbon offset (from borough)	Not yet received - applicant to submit and provide reference --->		
Whole life-cycle assessment	Received and nothing further required		
Be Seen monitoring commitment	Received but items still outstanding		

Required Metrics	Status	Stage 1 Value	Final Value	GLA Comment Reference
Domestic carbon emissions	N/A			
Non-domestic carbon emissions	Received and nothing further required			
Carbon offset payment amount	Not located in submission - applicant to populate Stage 1 value --->			
KWp renewable generation capacity	Received and nothing further required			
kWh annual renewable energy generation	Received and nothing further required			
Sqm of proposed PV array	Received and nothing further required			
Calculated SCOP of heat pumps	Received but items still outstanding			
Heat fraction provided by heat pumps	Received but items still outstanding			
Flow/Return temperatures proposed	Received and nothing further required			
Distribution loss assumption	Received but items still outstanding			

Detailed Comments - Applicant MUST provide detailed responses to the below items

Comment No.	GLA Stage 1 Date: 09/03/2021	Applicant's Stage 1 response Date:	GLA Post Stage 1 response Date:	Applicant's Post Stage 1 response Date:
General compliance comments				

- 1
- The energy strategy is generally compliant with the London Plan policies however, the applicant is required to submit the additional information, which has been requested below.
- 2
- The applicant has submitted the GLA's Carbon Emission Reporting spreadsheet, which has been developed to allow the use of the updated SAP 10 emission factors alongside the SAP 2012 emission factors. The applicant has provided two separe spreadsheets: i)for new buildings, ii)for the refurbished building.

Be Lean

- 3
- Based on the information provided, the non-domestic element of the proposed development is estimated to achieve a reduction of 117.2 tonnes per annum (18%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development. The refurbished building (pub) is estimated to achieve 10.8 tonnes per annum (19%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development.
- The applicant should clarify which energy efficiency measures have been considered for each building and provide an overview of their Be Lean strategy.

Overheating

- The applicant has noted that noise and air quality issues are a concern, considering the location by a busy central London main road. Mechanical ventilation and cooling has been proposed for the design of the buildings.
- 4
- The area weighted average (MJ/m²) and total (MJ/year) cooling demand for the actual and notional building has been provided and the applicant has demonstrated that the actual building's cooling demand is lower than the notional.
- The applicant is required to investigate and adopt further passive measures (in line with the Cooling Hierarchy - i.e. external shading) to avoid the risk of overheating now and in future climate. The applicant should provide more details on their approach to reducing the need for mechanical cooling.

Be Clean

	<p>The applicant has contacted the Citigen network operator and checked if the the proposed Citigen DHN could serve the site in the future. It was concluded that Citigen did not have any current plans to extent the network to the Salisbury Square site and due to the high costs that would be associated with this extension, it would not be able to justify the business case for this at present, or in the near future. For this reason, connection to this network was discounted.</p> <p>The applicant has also contacted the The City of London Planning Authority to confirm other opportunities for connection to heat network and it was confirmed that the Heat Networks Delivery Unit (HNDU) Study is being considered which may extend to the vicinity of the development. However, due to complexity, cost and timescale, this option has been deemed unviable.</p> <p>The applicant investigated the availability of local secondary heat sources. Two nearby potential sources were identified – the River Thames, located to the south of the site and nearby trunk sewers. Due to technical constraints, these option has been deemed unviable for the proposed development.</p> <p>The applicant has noted that the evidence of active two-way correspondence with the network operator and the local authority officer was included in Appendix D. However, Appendix D appears to be blank. In attached files, an email exchange with the City of London Planning Authority has been provided. The applicant should provide the evidence of their correspondence with all relevant parties as detailed in the main body of the report and the appendices. The applicant has noted that "Building or site-scale scale heating systems are proposed for each part of the site" while stating that a single energy centre will be serving the office, court and police station. The applicant should clarify if they propose a site-wide heat network supplied by a centralised energy centre and which uses will be connected to it. The applicant should confirm that all buildings will be connected to the heat network. A drawing showing the route of the heat network linking all buildings on the site should be provided alongside a drawing indicating the floor area, internal layout and location of the energy centre.</p> <p>The applicant has provided a commitment that the development is designed to allow future connection to a district heating network.</p> <p>The applicant has provided a drawing which shows the location of plate heat exchanger. A drawing demonstrating how the site is to be future-proofed for a connection to a district heating network should be provided. This should include a single point of connection to the district heating network.</p>
Be Green	
7	<p>A detailed roof layout has been provided demonstrating that the roof's potential for a PV installation has been maximised. The on-site savings from renewable energy technologies should be maximised regardless of the London Plan targets having been met. The estimated total area of the proposed PV array is approximately 515 m2 with 73.4 kWp capacity and 90,938 kWh annual energy generation.</p> <p>Heat pumps are being proposed in the form of a GHSP/ASHP system - ASHP serving the police station hot water demand, and GSHP serving all the space heating load and 40% of the cooling loads to the new buildings. ASHPs will also be serving heating and cooling to the refurbished building. The Turbocor chillers are proposed to meet the remaining cooling loads. The applicant has provided the following details:</p> <p>a. An estimate of the heating and/or cooling energy (MWh/annum) the heat pumps would provide to the development and the percentage of contribution to the site's heat loads. The applicant has demonstrated how the heat fraction from heat pump technologies has been maximised.</p> <p>b. Details of the Seasonal Coefficient of Performance (SCOP) and/or Seasonal Energy Efficiency ratio (SEER).</p> <p>The applicant has noted that the heat distribution temperatures (for space heat and hot water) and the distribution loss factor were included in Appendix G. However, this information is not available in the energy statement. Therefore, the applicant should provide additional information on the efficiencies modelled (how these are calculated), including the distribution losses assumed for the heating and cooling systems in the building. Further information should be submitted on the limitations associated with a single heat pump system supplying all buildings on site.</p>
Whole Life-Cycle Carbon Assessment	
9	<p>The applicant has submitted a WLC assessment which will be reviewed separately; comments will be provided. The WLC assessment should be presented separately in excel using the GLA's WLC assessment template and should follow the GLA WLC guidance. The template and guidance are available here: https://consult.london.gov.uk/whole-life-cycle-carbon-assessments. Applicants will also be conditioned to submit a post-construction assessment to report on the development's actual WLC emissions.</p>
Be Seen' Energy Monitoring	
10	<p>The applicant has indicated that an energy metering strategy will be developed to ensure that the Building Management System (BMS) has the capability to allow for this reporting requirements to meet the final step in the energy hierarchy under the new London Plan.</p> <p>A commitment should be provided that the development will be designed to enable post construction monitoring and that the information set out in the 'be seen' guidance is submitted to the GLA's portal at the appropriate reporting stages. This will be secured through suitable legal wording. The first submission of the planning stage data should be provided to the GLA through the Be Seen reporting spreadsheet within four weeks of planning approval or during planning determination.</p>
Other points	
11	<p>The applicant should confirm the carbon shortfall in tonnes CO2 and the associated carbon offset payment that will be made to the borough in light of the London Plan 2021 being adopted. The new carbon price is £95/tonne CO2 and there is a net zero carbon target for both domestic and non-domestic uses. This should be reflected in the response and the discussions with the local authority.</p>
Move resolved comments under this section	

Non-domestic - new

SAP 10	Total residual regulated CO ₂ emissions	Regulated CO ₂ emissions reductions	
	(tonnes per annum)	(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building Regulations	667.2		
Energy Efficiency	550	117.2	18%
CHP	550	0	0%
Renewable energy	343	207	31%
Total		324.2	49%

Carbon offsetting

	Shortfall (tonnes per annum)	Shortfall (£)
Domestic	0	0
Non-domestic	343	977550
Total	343	977550

Non-domestic - refurbished

SAP 10	Total residual regulated CO ₂ emissions	Regulated CO ₂ emissions reductions	
	(tonnes per annum)	(tonnes per annum)	(per cent)
Baseline i.e. 2013 Building Regulations	57.9		
Energy Efficiency	47.1	10.8	19%
CHP	47.1	0	0%
Renewable energy	21.3	25.8	45%
Total		36.6	63%

From: [DD - Airport Safeguarding/BAA](#)
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 20/00997/FULEIA
Date: 17 March 2021 11:24:45
Attachments: [image001.png](#)

Classification: Public

Dear Catherine Evans

We have now assessed the revised application below against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development. However, we would like to make the following observation:

Construction Aviation Warning Lights

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.

Kind regards

Lawrence Melkowski

Aerodrome Safeguarding Specialist
Airside Operations

Heathrow

Heathrow Airport Limited

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

m: +44 (0)7736 119025

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

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 15 March 2021 14:42
To: DD - Airport Safeguarding/BAA <safeguarding@heathrow.com>
Subject: Planning Application Consultation: 20/00997/FULEIA

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Dear Sir/Madam

Please see attached consultation for Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street, London, EC4Y .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Catherine Evans

Department of the Built Environment

City of London

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From: [NATS Safeguarding](#)
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 20/00997/FULEIA [SG30411]
Date: 18 March 2021 11:13:02
Attachments: [image005.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image015.png](#)
[image016.png](#)

Our Ref: SG30411

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

NATS

NATS Safeguarding

E: natssafeguarding@nats.co.uk

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



From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 15 March 2021 14:42
To: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Subject: Planning Application Consultation: 20/00997/FULEIA

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

Dear Sir/Madam

Please see attached consultation for Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street, London, EC4Y .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Catherine Evans

Department of the Built Environment

City of London

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Devlia, Neel

From: HNL Sustainable Places <HNLsustainablePlaces@environment-agency.gov.uk>
Sent: 19 March 2021 09:04
To: PLN - Comments
Subject: RE: Planning Application Consultation: 20/00997/FULEIA
Attachments: 132786.pdf

Hi Neel,

Thanks for outlining that. I can confirm we have no further response to make in addition to our previous response NE/2021/132786/01 dated 26 January.

Thanks

George Lloyd

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

From: PLN - Comments [mailto:PLNComments@cityoflondon.gov.uk]
Sent: 18 March 2021 14:13
To: HNL Sustainable Places <HNLsustainablePlaces@environment-agency.gov.uk>
Subject: RE: Planning Application Consultation: 20/00997/FULEIA
Importance: High

Dear George,

The full application proposal incorporates the following reason:

RECONSULTATION DUE TO SUBMISSION OF DETAILS OF REVISED SERVICING ARRANGEMENT FOR 8 SALISBURY COURT; ADDENDUM TO THE DESIGN AND ACCESS STATEMENT; AND ADDENDUM TO THE ENVIRONMENTAL STATEMENT COMPRISING AN UPDATE TO THE TRANSPORT ASSESSMENT AND THERMAL COMFORT ASSESSMENT.

I hope this clarifies.

Kind Regards

Neel Devlia

Senior Planning Administrator

Department of the Built Environment

City of London Corporation

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Due to Covid-19 the City Corporation Development Division will be minimising face to face meetings and participating digitally in meetings wherever possible.

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

From: HNL Sustainable Places <HNLsustainablePlaces@environment-agency.gov.uk>
Sent: 16 March 2021 14:01
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: RE: Planning Application Consultation: 20/00997/FULEIA

Good afternoon,

I responded to a consultation for a planning application with reference 20/00997/FULEIA on the 26th January (Our reference: NE/2021/132786/01). Please can you confirm if anything about this application has changed and requires us to look at it again?

Kind regards

George Lloyd

Planning Advisor, Hertfordshire and North London Sustainable Places Environment Agency | 2 Marsham Street, 3rd floor, London, SW1P 4DF

HNLSustainablePlaces@environment-agency.gov.uk

External : +44 2030 254843 | Mobile: +44 7880 475898

Pronouns : he/him (why is this here ?)

Does Your Proposal Have Environmental Issues or Opportunities? Speak To Us Early!

If you're planning a new development, we want to work with you to make the process as smooth as possible. We offer a bespoke advice service where you will be assigned a project manager who will be a single point of contact for you at the EA, giving you detailed specialist advice. This early engagement can significantly reduce uncertainty and delays to your project. More information can be found on our website here.

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

From: PLNComments@cityoflondon.gov.uk [mailto:PLNComments@cityoflondon.gov.uk]

Sent: 15 March 2021 14:43

To: HNL Sustainable Places <HNLSustainablePlaces@environment-agency.gov.uk>

Subject: Planning Application Consultation: 20/00997/FULEIA

Dear Sir/Madam

Please see attached consultation for Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street, London, EC4Y .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Catherine Evans

Department of the Built Environment

City of London

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Ms Catherine Evans
Department of the Built Environment
City of London
PO Box 270,
Guildhall,
London EC2P 2EJ

By email to: PLNComments@cityoflondon.gov.uk & catherine.evans@cityoflondon.gov.uk

Our reference: 21027

16th March 2021

Dear Ms Evans,

Planning application: 20/00997/FULEIA and listed building consent applications 20/00996/LBC and 20/00998/LBC - 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) | Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street, London, EC4Y

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.

The House of Commons Briefing Paper (Number 00930, 11 July 2016) pertaining to calling in planning applications states that: *'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.'* We consider the applications should be called in for the following reasons:

Strategic nature of the proposals

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 & Access Statement (DAS) states a key ambition of the proposals is to *'reinforce the UK's reputation'* in the arenas of law and justice. The new courts building, the largest of the three proposed, is described as a *"national asset for the HMCTS"* that will *"reinforce the UK's reputation as a world-leading legal centre"* 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' *"fulfilment of its national policing obligations"* and its *"national role in preventing and investigating fraud."*

Protection of the historic environment

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 benefits.

"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."

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.

Policy appraisal

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 *"the distinctive character and appearance of the City's conservation areas"* (Core Strategic Policy CS12: Historic Environment)

The Local Plan also states that *"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"* (Policy DM 12.2 Development in conservation areas).

Strategic Policy S11 in the City's emerging Local Plan 2036 (Proposed Submission Draft: March 2021) which states that: *"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."* Policy HE1 'Managing Change to Heritage Assets' also restates Policy DM 12.2 outlined above.

The National Planning Policy Framework (NPPF, 2019) 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"* (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.

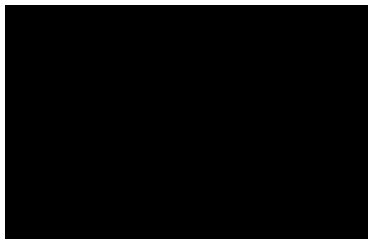
National Planning Policy Guidance PPS5 similarly states there is a presumption in favour of conserving heritage assets when assessing planning applications.

Conclusion

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.

I would be grateful if you would keep me informed of any further decisions on consultations regarding this application.

Yours sincerely,



Benedict Oakley
Conservation Officer

Comments for Planning Application 20/00997/FULEIA

Application Summary

Application Number: 20/00997/FULEIA

Address: Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street, London, EC4Y

Proposal: 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)

Case Officer: Catherine Evans

Customer Details

Name: Ms Rachael Smith

Address: [REDACTED]

Comment Details

Commenter Type: Other

Stance: Customer made comments in support of the Planning Application

Comment Reasons:

Comment: 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.

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.

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.

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.

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 FS

Memo

To Assistant Director (Development Management)
Department of the Built Environment

From Access Team
Department of the Built Environment

Telephone 020 7332 1995

Email lydia.morley@cityoflondon.gov.uk



Date 22 March 2021

Our Ref 20/00997/FULEIA

Subject Land Bounded By Fleet Street, Salisbury Court, Salisbury Square,
Primrose Hill & Whitefriars St London, EC4Y

The Access Team has assessed the planning application to ensure that the proposal meets the highest standards of accessibility and inclusive design required by London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and City Plan 2036 Intend to Submit Policy HL1.

COURT BUILDING

1. Some details have been redacted due to security reasons, therefore it is not possible to assess the whole building or the access routes and sanitary provisions for each segregated user group e.g. judiciary, HMCTS staff, custody, jury and public. However, a comprehensive Access Strategy by David Bonnett Associates has been provided.

Horizontal circulation

2. It is important to ensure that all external doors to be used by the general public have a minimum 1000mm effective clear width, as it appears that the Salisbury Court entrance is narrower than this. Internal doors should have a minimum 800mm effective clear width (single leaf or one leaf of a double leaf door), however a Second Floor Consultation Room has approximately 680mm effective clear width for one leaf of a double leaf door. Refer to ADM Volume 2 Table 2 and 2.13b for details.
3. The Access Strategy states that “security barriers between the reception and main core will feature at least one barrier in each location with a minimum clear-opening width of 1000mm”, however there are concerns that the Ground Floor plan does not reflect this and narrower barriers may be proposed.
4. The landings at the foot and head of a ramp should be a minimum 1200mm long and clear of any obstructions or door swings (Approved

Document K 2.13a), however this is not proposed in several locations due to door swings.

5. Several internal lobbies are undersized. They should be large enough so that a wheelchair user, with or without a companion, can move clear of one door before attempting to open the second door, and a minimum of 1570mm clear space between the door swings is required (Approved Document M Volume 2 3.15 and 3.16).
6. The Access Strategy shows that a platform lift would be provided on the Ground Floor near the cycle lift, however the Ground Floor plan only shows stepped access. This should be amended accordingly.
7. On the Fifth Floor, there are two Consultation Rooms and one Hearing Room which only have stepped access from the northern access route. This is also the case for one room on the Fourth Floor and several rooms on the Ground Floor in east of the building. It is noted that step-free access is available via other doors however due to segregation of users and public/private zoning. It is assumed that the step-free routes would not be accessible to all, which is not deemed acceptable within a new, purpose-built Court Building.
8. On the Seventh Floor roof terrace, rooflights are located in the centre of a terrace. It is not clearly apparent whether they would be flush with the adjacent paving surface or can be travelled across but, even if they are, there is a risk that they could either be slippery or be perceived as slippery and not be desirable to travel across. Also if they have a translucent surface, it could be disorientating for partially sighted people and people with sensory/ neurological processing difficulties. Narrow access routes, approximately 900mm wide are proposed to the north and south of the rooflights and a minimum 1200mm wide access route is recommended.
9. Spacious corridors and wide doorways, with doors that are automated with push button or pressure pad operated, should be provided to the cycle parking area (London Cycling Design Standards 8.2.1).

Sanitary facilities

10. The Access Strategy states that a “Changing Places toilet will be provided subject to further investigation as to the most appropriate location”, however it has not been shown on the plans. Due to the large dimensions of a Changing Places facility, at least 3m wide and 4m long, it is important that it is shown on the plans to demonstrate the feasibility of its provision.

11. Several wheelchair-accessible WC facilities are undersized as they should be a minimum 1500x2200mm (Approved Document M Volume 2 Diagram 18).
12. It is good practice for a cubicle for ambulant disabled people to be provided within each set of unisex self-contained cubicles, refer to BS8300- 2:2018 18.5.1 and Figure 39 for more details.
13. The provision of a wheelchair-accessible WC and shower facility on the Lower Ground Floor is welcomed however it is recommended that the WC pan and shower seat have the same transfer direction. Please refer to Approved Document M Volume 2 Diagram 24 for layout guidance.

POLICE HEADQUARTERS

14. Some details have been redacted due to security reasons therefore it is not possible to assess the whole building. However, the comprehensive Access Strategy by David Bonnett Associates is welcomed.

Horizontal circulation

15. The outward opening doors for the Police Station entrance and cycle entrance project more than 100mm from the building frontage and would therefore require hazard protection (refer to Approved Document K 10.2 for details).
16. The internal lobby from the public Police Station reception appears to be undersized. It should be large enough so that a wheelchair user, with or without a companion, can move clear of one door before attempting to open the second door, and a minimum of 1570mm clear space between the door swings is required (Approved Document M Volume 2 3.15 and 3.16).
17. Spacious corridors and wide doorways, with doors that are automated with push button or pressure pad operated, should be provided to the cycle parking area (London Cycling Design Standards 8.2.1). It is also recommended that access to the cycle storage should involve no more than two sets of doors, however four sets of doors are proposed on the access route to the cycle lift on the ground floor.

Sanitary facilities

18. It is recommended that a wheelchair-accessible WC is located as close to the entrance of a building as possible (Approved Document M Volume 2 5.10a). This may already be proposed but not shown on the redacted plans.

19. There is limited information provided on the Basement 2 plan, however it is recommended that a wheelchair-accessible WC and shower facility should be provided (refer to Approved Document M Volume 2 Diagram 24 for details).
20. It is recommended that a choice of wheelchair-accessible WC layouts, suitable for left-hand and right-hand transfer, are alternated between floors as this caters for people who are paralysed or have limited mobility on one side or the other.
21. It is good practice for a cubicle for ambulant disabled people to be provided within each set of unisex self-contained cubicles, refer to BS8300- 2:2018 18.5.1 and Figure 39 for more details.

Cycle facilities

22. It is noted in the Transport Assessment that 7 cycle storage spaces for larger cycles are proposed which will meet the required 5% of overall provision (London Cycling Design Standards 8.2.1). However, it is not clearly apparent where these are proposed.

COMMERCIAL BUILDING

Horizontal circulation

23. It is important to ensure that all external doors to be used by the general public have a minimum 1000mm effective clear width (single leaf or one leaf of a double leaf door), refer to ADM Volume 2 Table 2 and 2.13b for details. The retail entrances (Ground Floor and First Floor) and cycle entrances appear to be too narrow.
24. The First Floor Retail entrance is located very close to the top of a staircase and tactile paving may need to be travelled across to gain access, neither of which good practice.
25. Although the outward opening entrance doors to the First Floor retail unit and cycle facilities are recessed from the building frontage, it is recommended that hazard protection due to the close proximity of the entrances.
26. It is recommended that the bottom end of the vertical pull handle should be positioned between 700-1000mm above floor level (BS8300- 2:2018 Figure 5). Lower protruding features can cause injury to a wheelchair user or damage to their wheelchair.
27. Spacious corridors and wide doorways, with doors that are automated with push button or pressure pad operated, should be provided to the cycle parking area (London Cycling Design Standards 8.2.1). It is also recommended that access to the cycle storage should involve no

more than two sets of doors, however this is exceeded to the retail cycle storage on the ground floor.

Vertical circulation

28. The proposed platform lift between the ground and first floor of the retail unit is welcomed, however it is noted that no step-free access to the lower area of the ground floor unit is proposed. It is important that future tenants are made aware that service providers have an anticipatory duty under the Equality Act 2010 to make reasonable adjustments to ensure that disabled people can access services at a standard that is as close as possible to that offered to the wider public.

Sanitary facilities

29. It is good practice for a cubicle for ambulant disabled people to be provided within each set of unisex self-contained cubicles, refer to BS8300- 2:2018 18.5.1 and Figure 39 for more details.
30. A variety of left-hand and right-hand transfer wheelchair-accessible WC facilities are proposed however it would be better practice for these to alternate between floors.
31. The provision of a wheelchair-accessible WC and shower facility for retail staff on the Ground Floor is welcomed however it is recommended that the WC pan and shower seat have the same transfer direction. Please refer to Approved Document M Volume 2 Diagram 24 for layout guidance.

Cycle facilities

32. It is noted in the Transport Assessment that 5 cycle storage spaces for larger cycles are proposed in the Cycle Hub and 8 in the commercial cycle facilities, both of which meets the required 5% of overall provision (London Cycling Design Standards 8.2.1). However, the spaces proposed are approximately 900x2240mm. The proposed larger cycle space in the Courts Building is approximately 1200x2300mm and this is preferable as larger cycles such as tricycles, handcycles and recumbent cycles can be up to 1.2m wide.
33. The access to the Cycle Hub and commercial cycle facilities is accessible although disappointingly not inclusive. 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. Step-free routes would be limited to Salisbury Square and via the North Passage.

2-7 SALISBURY COURT

34. It is recommended that the external doors on the new Salisbury Square façade should have a minimum 1000mm effective clear width, and the external door on the retained Salisbury Court façade a minimum 775mm effective clear width (single leaf door or one leaf of a double leaf door). Refer to ADM Volume 2 Table 2 and 2.13b for details.
35. It is recommended that vision panels are provided in the Salisbury Court entrance doors in order for people to be able to see people approaching from the opposite direction and prevent collision (Approved Document M Volume 2 2.12 and Approved Document K 10.1).
36. It is pleasing that a wheelchair-access WC facility is proposed on each public floor, however they all have right-hand transfer layouts. It is noted there are space constraints however it is recommended that at least one left-hand transfer facility is provided.
37. The lobbies to the WC facilities and by the stepped entrance are too small. They should be large enough so that a wheelchair user, with or without a companion, can move clear of one door before attempting to open the second door, and a minimum of 1570mm clear space between the door swings is required (Approved Document M Volume 2 3.15 and 3.16).
38. Consideration should be given to the feasibility of handrails and contrast step nosings at the stepped entrance and fire escape.

PUBLIC REALM

39. The two proposed trees on Fleet Street are located centrally in the pavement and would create an obstruction. It is recommended that they are removed from the proposal.
40. A raised carriageway is proposed adjacent to Salisbury Square and although they can be beneficial to some people with mobility impairments, they can have a detrimental effect on people who are blind or partially sighted. The removal of a kerb, and subsequent clear definition of the carriageway and footway, can impact the ability for people to navigate safely along the street. It is noted that the pavement and carriageway would have a visual contrast, however consideration should also be given to tactile delineation.
41. There is also concern that when the designated disabled parking bays are occupied a pinch point would be created, and the presence of

southbound vehicles could increase the likelihood of cyclists travelling along the pavement. Some disabled people are fearful and intimidated by the presence of cyclists in the same space and will avoid such places if they do not feel safe or comfortable.

42. Blister tactile paving is proposed by St. Bride's Avenue and St. Bride's Passage however it does not align fully with or extend the full width of the passageways. The hazard warning paving should be amended to ensure pedestrians using the passageways are aware of the presence of the carriageway.
43. Blister tactile paving should also be extended to the full width of the raised table on the Whitefriars Street and Fleet Street junction.
44. Bollards should be at least 1000mm high, visually contrast with the background and have at least 1200mm effective clear width between them. It is also desirable to incorporate a 150mm deep contrasting strip at the top of low-level bollards. (BS8300-1:2018 8.2.1.2)
45. On the Fleet Street and Salisbury Court junction, the bollards do not have the same offsets from the Salisbury Court kerb line. There is concern that this could obstruct, particularly the bollard located more centrally in the pavement, on the rear of the tactile paving.
46. Feathered steps can be a trip hazard and should be avoided where possible. "Tapered risers should not be used as people who are blind or partially sighted require an even height riser when ascending or descending. On sites where steps abut a slope, the interface between the slope and the steps should not form part of an access route. In addition, the point at which the tread meets the slope should be clearly identified" (BS8300-1:2018 9.1.2). Due to the angle of the steps, it narrows the access route and cuts across the desire line between Salisbury Court and the north passage. There is a risk that this would increase the chance of people tripping/falling on the feathered step(s).
47. It is unclear whether tactile paving is proposed for the tapered steps but this should be provided, along with contrast step nosing and handrails, in order to highlight the presence of the steps.
48. The width of the staircase adjacent to 2-7 Salisbury Court is not consistent between the landscape plans (approximately 650mm wide) and architecture ground floor plan (approximately 1185mm wide). It is recommended that staircase should be a minimum 1200mm wide and have contrast step nosing, handrails on both sides and tactile paving (Approved Document M Volume 2 1.33c/f/i/o).
49. The slip resistance of the granite cladding from Fleetbank House should be checked to assess whether it would be a suitable paving material in

- all weather conditions. It would also need to provide a firm, level paving surface with similar frictional qualities to the adjacent surfacing.
50. Consideration should be given to providing a variety of seating and appropriate accessible space should be allowed for wheelchair users to be integrated within the general seating provision. Back and arm supports as well as a variety of seat heights should be considered (BS8300-1:2018 10.7). This is applicable to the public realm and the roof terraces across the whole development.
51. It is recommended that a 1500x1500mm level landing is provided outside the platform lift.
52. Due to the location of the cycle storage entrances, volume of cycle stands and their distance from the carriageway, there is a risk of conflict between cyclists and pedestrians. Consideration should be given to how cyclists could be encouraged to dismount when leaving the carriageway (unless the cycle is used as a mobility aid).
53. The proposed water features in the North Passage are high and would not be suitable for wheelchair users, people of short stature and children to interact with and could be an oppressive feature. There is also concern that the vents could blow air into their faces and create an uncomfortable environment.
54. It is noted that a new alley is proposed adjacent to The Harrow public house. It is disappointing that only stepped access is proposed, and confirmation is required whether the provision of step-free access was investigated. There is concern that it is narrower than the minimum 1200mm required for an access route and steps (although 1500-2000mm is preferred to allow for passing points).

PARKING FACILITIES

55. London Plan 2021 Policy T6.5 states that all developments should be car-free except for at least one on or off-street disabled persons parking bay. Two off-street accessible parking bays are proposed in the Courts Building however as these would only be available for the judiciary, and not the wider users of the Courts e.g. general HMCTS employees, it would be good practice for an on-street accessible parking bay to also be provided. Two on-street designated disabled parking bays are proposed on Salisbury Square and it is noted there is potential to introduce another if the existing doctor's parking bay were to be converted. The introduction of a third on-street designated disabled parking bay would be welcomed.

56. It is noted from the Transport Assessment that the existing designated disabled parking bay at the north of Whitefriars Street would be retained, however confirmation is required as it is not shown on the landscape plans.

57. Due to the proposed widening of the Whitefriars Street carriageway to the south of the site to support rapid response vehicles, it is noted that car and motorcycle parking adjacent to the Police and Commercial Buildings will be removed. Confirmation is required whether the existing designated disabled parking bay will be retained.

The Access Team promotes good practice standards of inclusive design and encourages early consideration of accessibility in the design process so that a truly inclusive environment can be achieved that everyone will be able to visit, use and enjoy.

Yours sincerely

Lydia Morley

Access Advisor

From: [Evans, Catherine](#)
To: [DBE - PLN Support](#)
Subject: FW: Fleet Street Estate/Salisbury Square Development (20/00997/FULEIA)
Date: 24 March 2021 09:13:57
Attachments: [image004.png](#)
[image005.png](#)

From: Pundsack, Mark <Mark.Pundsack@cityoflondon.gov.uk>
Sent: 19 March 2021 16:30
To: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>
Cc: Bush, Beverley <Beverley.Bush@cityoflondon.gov.uk>
Subject: RE: Fleet Street Estate/Salisbury Square Development (20/00997/FULEIA)

Catherine,

I have reviewed the fire safety strategy for the fleet street estate project.

The project team have 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 at Planning Stage.

Regards

Mark Pundsack CEng MRICS AIFireE FISTructE
Assistant District Surveyor



District Surveyor's Office
Department of the Built Environment
City of London Corporation

T: 020 7332 1953
M: 07930 543 486

<https://www.cityoflondon.gov.uk/services/business-standards/building-control>

From: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>
Sent: 16 March 2021 16:55
To: Pundsack, Mark <Mark.Pundsack@cityoflondon.gov.uk>
Cc: Bush, Beverley <Beverley.Bush@cityoflondon.gov.uk>
Subject: Fleet Street Estate/Salisbury Square Development (20/00997/FULEIA)

Hi Mark,

Tim Munday has given me your name as the best contact on Fire Statements.

The attached Fire Statement has been submitted for the planning application for the Fleet Street Estate (also known as the Salisbury Square Development). This is the development to provide the new Court and Police HQ. Please could you have a look at it for us?

Best wishes,
Catherine

Catherine Evans

Senior Planning Officer

Department of the Built Environment

City of London

020 7332 1352

07842 601194

www.cityoflondon.gov.uk



COVID 19: CITY STREETS

We have made some temporary changes to Square Mile streets to enable social distancing and provide more space for walking and cycling.

Complete our survey to tell us what you think.



BEECH STREET ZERO EMISSIONS SCHEME

We have introduced temporary changes on Beech Street, Bridgewater and Golden Lane with the aim of reducing air pollution.

Complete our survey to have your say on these changes.

GREATER **LONDON** AUTHORITY

Good Growth

Catherine Evans
Senior Planning Officer
Department of the Built Environment
City of London
PO Box 270, Guildhall
London EC2P 2EJ

Our ref: 2021/0155/S1

Your ref: 20/00997/FULEIA

Date: 29 March 2021

By Email

Dear Catherine

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

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

Local Planning Authority reference: 20/00997/FULEIA

I refer to the copy of the above planning application, which was received from you on 08 February 2021. On 29 March 2021 the Mayor considered a report on this proposal, reference 2021/0155/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not yet comply with the London Plan for the reasons set out in paragraph 71 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations. The environmental information made available to date has been taken into consideration in formulating these comments.

If your Corporation subsequently resolves to approve the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Corporation under Article 6 to refuse the application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority

proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

If your Corporation resolves to refuse permission it need not consult the Mayor again (pursuant to Article 5(2) of the Order), and your Corporation may therefore proceed to determine the application without further referral to the Mayor. However, you should still send a copy of the decision notice to the Mayor, pursuant to Article 5 (3) of the Order.

Please note that the Transport for London case officer for this application is Deborah Ewenla, email v_DeborahEwenla@tfl.gov.uk.

Yours sincerely



John Finlayson

Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
Lucinda Turner, TfL
Sophie Hardy, Gerald Eve LLP, 72 Welbeck Street, London W1G 0AY

**Land bounded by Fleet Street, Salisbury Court,
Salisbury Square, Primrose Hill & Whitefriars Street****Local Planning Authority: City of London**
local planning authority reference: 20/00997/FULEIA**Strategic planning application stage 1 referral**

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

The proposal

Demolition of existing buildings and part demolition and renovation of 2-7 Salisbury Court (Grade II); erection of 3 new buildings (a combined court building, police headquarters and commercial building); carrying out of public realm and highway works; dismantling, relocation and reconstruction of the Grade II listed Waithman obelisk within Salisbury Square; and, other associated and ancillary works and structures.

The applicant

The applicant is the **City of London Corporation** and the architects are **Eric Parry Architects** and **Richard Griffiths Architects**.

Strategic issues summary

Principle of development: 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 Policies S1, SD4 and SD5 and Good Growth Objective GG1 (paragraphs 16-18).

Heritage, strategic views and urban design: 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 (paragraphs 19-45).

Transport: 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 (paragraphs 46-58).

Sustainable development: 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 (paragraphs 59-65).

Recommendation

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.

Context

1. On 08 February 2021, the Mayor of London received documents from City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Corporation with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Category of the Schedule to the Order 2008:
 - **Category 3E(xi):** Development which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and comprises or includes the provision of more than 2,500 square metres of non-residential floorspace.
3. Once the City of London Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; or, allow the Corporation to determine it itself.
4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
5. The Mayor of London's statement on this case will be made available on the GLA website: www.london.gov.uk.

Site description

6. The 1.06-hectares application site is within the Central Activities Zone (CAZ) and the City of London's Square Mile. The site is bound by Fleet Street to the north, Whitefriars Street to the west and Salisbury Court to the east. On the site's southern boundary are 8 Salisbury Square (an office building), Primrose Hill and the Grade II listed The Harrow Public House.
7. There are currently nine properties on the site - eight have been granted Certificate of Immunity from listing status and 2-7 Salisbury Court is Grade II listed. The small publicly accessible Salisbury Square and the Grade II listed Obelisk in centre (Waithman Obelisk), also forms part of the application site.
8. The northern and north-easternmost parts of the site are within the Fleet Street Conservation Area (CA) and a very small part of the site is in the Whitefriars Conservation Area immediately to the southwest. Temple Conservation Area is further to the west and St Paul's Cathedral Conservation Area is further east of the site. A number of listed buildings are also in proximity, including: the Grade I listed Church of St Bride's; Grade II* The Daily Express Building; and, Grade II 19 Salisbury Court, Remains of Former Whitefriars Convent, Tipperary Public House, 143 & 144 Fleet Street, Mersey House and the Daily Telegraph Building.
9. Although not falling within any of the protected vistas set out in the London View Management Framework (LVMF), the proposal would be visible in several designated LVMF River Prospect views. Locally, the site is not located within the St Paul's Heights Area.

Details of this proposal

10. The City Corporation is seeking permission to redevelop the application site by demolishing the existing buildings located at: 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 and erecting the following buildings:
 - a 7-storey (plus ground floor and two basement levels) building for Her Majesty's Courts & Tribunals Service (HMCTS) that would house 8 Crown Courts, 5 Magistrates Courts and 5 Civil Courts, and would replace the existing Civil Court, the Mayor's and City of London Court and City of London Magistrates' Court;
 - a 10-storey (plus ground, lower ground and two basement levels) building, which would become the City of London Police Headquarters; and,
 - a 9-storey commercial building, with seven floors of office accommodation, retail space at ground and lower ground levels and a publicly accessible cycle hub (with 125 spaces) in the second basement level.
11. In addition to the above, the Grade II listed 2-7 Salisbury Court would be partially demolished and renovated, 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 and its changed to a drinking establishment.

Case history

12. GLA officers held a pre-application "in principle" planning meeting with the applicant on this scheme in October 2020. The advice note issued by GLA officers supported the proposed land uses given the site's location within the City of London and the Central Activities Zone (CAZ). In addition, no strategic objection to the site incorporating appropriately designed taller buildings was raised but it was noted that the scheme's scale and design must respond to and reflect the site's location, prominence and visibility in any LVMF and locally important views. GLA officers' advice highlighted the sensitivity of the setting and the importance of addressing this in the design of the development. Compliance with the Mayor's Healthy Streets objectives and London Plan policies on cycle parking provision, inclusive access, fire safety and sustainability was also emphasised in the note.

Strategic planning issues and relevant policies and guidance

13. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the City of London Local Plan 2015 and the London Plan 2021.
14. The following are also relevant material considerations:
 - The National Planning Policy Framework and National Planning Practice Guidance; and,
 - Draft City Plan 2036 Proposed Submission (August 2020).
15. The relevant issues, corresponding strategic policies and guidance, are as follows:
 - Good Growth *London Plan;*
 - World City role *London Plan;*

- Central Activities Zone *London Plan;*
- Culture *London Plan; Mayor's Cultural Strategy; Culture and Night-Time Economy SPG;*
- Social infrastructure *London Plan; Social Infrastructure SPG;*
- Heritage & urban design *London Plan; Character and Context SPG;*
- Strategic views *London Plan; LVMF SPG;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy; and,*
- Transport and parking *London Plan; the Mayor's Transport Strategy.*

Principle of development – Social infrastructure in the CAZ

16. Good Growth Objective GG1 of the London Plan sets the tone for the Mayor's concept of good growth of which diversity, equality and inclusiveness are key pillars. GG1 further emphasises the need for access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities in order to engender active participation and social integration and tackle social isolation. London Plan Policy S1 therefore supports the provision of social infrastructure as part of development proposals, including criminal justice, policing and emergency facilities.
17. The application site is within the Central Activities Zone (CAZ). London Plan Policy SD4 and Policy SD5 establish the strategic priorities and functions of the Central Activities Zone and seek to promote the CAZ as one of the world's most attractive and competitive business locations, whilst supporting its rich mix of local and strategic uses. Policy SD4 identifies the CAZ as a centre of excellence and specialist clusters including functions of state, health, law, retail, night-time and cultural activities.
18. In view of the above, the proposed 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 Policies S1, SD4 and SD5 and Good Growth Objective GG1.

Heritage

19. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to conservation areas, for all planning decisions "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area". Regarding listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses". If it is judged that harm to the heritage asset/s would arise from the proposed development, considerable importance and weight must be attributed to that harm, in order to comply with the statutory duties.

20. 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; irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Paragraph 194 makes clear 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.
21. Paragraph 195 states that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Alternatively, it would have to be demonstrated that the nature of the heritage asset prevents all reasonable uses of the site; and no viable use of the heritage asset can be found in the medium term through appropriate marketing that will enable its conservation; and conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and the harm or loss is outweighed by the benefit of bringing the site back into use. Furthermore, paragraph 196 of the NPPF states that where a development 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. 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.
22. London Plan Policy HC1 emphasises the importance of heritage assets stating that development should conserve heritage assets and avoid harm which also applies to non-designated heritage assets.
23. As stated earlier in this report, parts of the site are within the Fleet Street and Whitefriars Conservation Areas, and Temple Conservation Area and St Paul's Cathedral Conservation Areas are in close proximity to the site. The site itself contains a number of listed buildings, with further listed buildings nearby. The application is supported by a townscape visual impact assessment (TVIA) and a built heritage impact assessment (BHIA). Officers are satisfied that the assessment points in the TVIA form a comprehensive basis from which to assess the proposed scheme's impact on heritage assets and those most likely to be impacted by the proposed development are analysed below.

2-7 Salisbury Court

24. The Grade II listed red brick building was built in 1878 in the Queen Anne Revival style, with shops at ground floor and newspapers, printers and publishers on the other floors. It is understood that the original building has undergone some changes, including the demolition of 1 Salisbury Court, additions and extensions to the roof and removal of loading bay doors. It is further understood that the asset's ornate frontage on to Salisbury Court is its primary significance. The proposal includes the repurposing of this building as a public house, restoration of its street elevation and roof and reconstruction of its modernised interior. Reinstatement of

gables and dormers, a new south elevation to Salisbury Square in a Queen Anne style and removal of modern features are some of the works proposed.

25. To facilitate the construction of the new court building, a part of the building on the northwest is to be removed. Historic party walls between the buildings at 2-3, 4-5 and 6-7 Salisbury Court are also to be removed and walls reinserted between 2-3 and 4-5. This is to create a layout more conducive to the operation of a public house. It is, however, understood that the primary significance of this heritage asset is its ornate elevation and this would not be altered by these changes. When considered in the context of the overall restoration and the benefits from this exercise any harm caused would be less than substantial.
26. In terms of its setting, the demolition of the two buildings to its immediate south--8 Salisbury Court and 1 Salisbury Square—would have some impact, albeit less than substantial.

Waithman Obelisk

27. Constructed in 1833 to honour the former Lord Mayor Robert Waithman MP, the Grade II listed Obelisk sits in the centre of Salisbury Square. Made of grey granite, the structure was relocated to its current location from Bartholomew Close in 1977 after a previous move in 1951 from Fleet Market. The relocation to its current spot was determined to be more appropriate in view of the nearby burial place of Waithman and his wife in St Bride's Church. The application proposes to shift the Obelisk slightly to the south east within the expanded Salisbury Square public space. In its new position, the listed structure would appear more prominently in the Salisbury Square and mark the South Passage, one of the new east-west routes connecting Salisbury Court and Whitefriars Street. The proposed renovation of the 2-7 Salisbury Court and erection of the new buildings would result in a setting similar to that which currently exists. GLA officers therefore conclude that the proposed development would cause no harm to the significance of this listed structure.

Fleet Street Conservation Area

28. As indicated earlier in this report, the northernmost and north-easternmost parts of the site fall within this CA, which was first designated in 1971 and last reviewed in 2007. It is 6.7 hectares and covers an area from the boundary between the Cities of London and Westminster eastwards to include Ludgate Circus and part of the west side of New Bridge Street. Across the CA, building heights range between 3-9 storeys with most being 5-6 storeys in height and the predominant materials are brick and stone, mainly Portland. The eastern end of Fleet Street on the south side, where the application site is situated, is characterised by large modern buildings mixed with Victorian frontages. The demolition of the unlisted buildings would have some impact on the setting of the conservation area, which could be outweighed by the public benefits to be derived from the proposal. It is noted that Historic England (HE) has raised concerns about the loss of 8 Salisbury Court and 1 Salisbury Square (unlisted historic buildings) as unjustified harm to the CA; therefore, whilst GLA officers conclude that some harm would be caused, it is recommended that the applicant work with HE to seek to minimise this harm.
29. GLA officers, however, conclude that the proposed new buildings would cause no harm to the significance of the conservation area, as the new court would maintain the appearance of the Fleet Street façade and its townscape. This is demonstrated in easterly views taken along Fleet Street such as 19C, 9D, 19E and 19F and

westerly views 15D, 17 and 16 set out in the TVIA. These views also demonstrate how the architectural approach to the court building references the adjacent listed Lutyens building at 82-85 Fleet Street and in so doing causes no harm to the significance of this heritage asset.

30. In terms of the police building and commercial building, although taller than the existing Fleetbank House, the two buildings are of a higher architectural quality and their slender appearance relates better to 8 Salisbury Square and the listed 2-7 Salisbury Court.
31. The Grade I listed Church of St Bride's is also within the Fleet Street Conservation Area and is visible in a number of westerly views from Ludgate Hill presented in the TVIA. In Views 15C and 15D it is clear that part of the proposed development would appear in the background of the lower end of the Church's spire causing no harm its significance. From Whitefriars Street in View 24, the positive impact of the creation of the North Passage on the Church is evident as the Church's spire would now be visible from this location.

Whitefriars Conservation Area

32. The Whitefriars Conservation Area is predominantly to the southwest of the application site and a small part of the application site where replacement paving is proposed falls within this CA. Whitefriars Street, which runs between this CA and Fleet Street CA is characterised by a mixture of modern and historic buildings. Though taller, the replacement buildings fronting Whitefriars Street would not cause harm as they would maintain that mixture of modern and historic buildings evident along Whitefriars Street and further south in the CA. This is evident in view 21 of the TVIA (Carmelite Street from the Embankment) taken within the Whitefriars CA. In the existing scenario, Fleetbank House and other modern buildings located on Whitefriars Street and further south on Carmelite Street are visible. The listed 9 Carmelite Street and other historic buildings are also visible. In the proposed view both the police and commercial buildings are visible, with the commercial building prominent in the background and its earthy colour palette blending well with the older brick buildings in this view. The Grade II listed The Harrow Public House is also visible and the colour palette of the proposed commercial building would contrast well with the listed asset, enhancing its appearance.

Conclusion on heritage impact

33. Having analysed the assessments contained in the BHIA and TVIA and having regard to the statutory duties in respect of listed buildings and conservation areas in the Planning (Listed Buildings and Conservation Areas) Act 1990, and the relevant paragraphs in the NPPF in relation to heritage assets, GLA officers conclude that there would be harm caused to 2-7 Salisbury Court and the Fleet Street Conservation Area owing to the proposed demolition. This harm must be given considerable importance and weight. Other nearby heritage assets would not be harmed by the proposed development.
34. As harm has been identified, the scheme does not comply with London Plan Policy HC1. However, in accordance with the NPPF, this harm could, in the view of GLA officers, be clearly and convincingly outweighed by the public benefits of the scheme, which include a new police headquarters, new judicial courts and an expanded public square with high quality east-west routes connecting streets on the southside of Fleet Street.

Strategic views

35. Policy HC4 of the London Plan states that development should not harm strategic views. Further details are provided in the Mayor's LVMF SPG, which provides guidance in relation to London's key views (panoramas, river prospects, townscape views, and linear views) and how they should be protected and managed. A number of visualisations from LVMF River Prospects have been set out, including 13A.1 (Millennium Bridge – close to the Southwark landing); 12A.1 (Southwark Bridge: upstream – at the centre of the bridge); 11A.1 (London Bridge); 16A.1 (The South Bank: Outside Royal National Theatre); 15B.2 (Waterloo Bridge: downstream – at the centre of the bridge); and, 16B.2 (The South Bank: Gabriel's Wharf viewing platform – centre of north-east rail). The visualisations presented in the TVIA demonstrate that the proposal is compliant with the LVMF and London Plan Policy HC4.

Urban design

36. Policies D1 and D2 of the London Plan seek to ensure that new developments are well-designed and compatible with the local character of an area. New buildings and spaces should respond to the form, style and appearance to successfully integrate into the local character of an area, with a positive relationship with the natural environment and respect and enhance the historic environment.

Tall buildings

37. Policy D9 of the London Plan makes clear that tall buildings should only be developed in locations identified in local plans as being suitable for such buildings. Policy D9 further states that Development Plans should define what is a tall building but this should not be less than 6 storeys or 18 metres, measured from ground to the floor level of the uppermost storey. Paragraph 3.14.1 of the City Plan defines a tall building as one which significantly exceeds the height of their general surroundings. In the emerging draft local plan, Policy S12 explicit definition stating that a tall building is one over 75 metres above ordnance datum (AOD). Neither of the buildings proposed would be over 75 metres AOD.

Layout, scale and massing

38. The site layout is simple and legible and is supported. The existing connected T-shape is replaced with a split L-shaped layout, with the court building sitting at the northern end of the site fronting onto Fleet Street. The police and commercial buildings sit immediately south of the court building on the western boundary of the site along Whitefriars Street and oriented towards Salisbury Square in a manner similar to what currently obtains.
39. The shifting of the building line west allows for an enlarged Salisbury Square and this would also lead to significantly improved activation along Whitefriars Street. By providing three separate new buildings, new east-west routes (North Passage and South Passage) are created, which would improve permeability across the southern side of Fleet Street. Both new routes would be well-activated and the South Passage would connect Salisbury Court to Whitefriars Street and Bouverie Street to the west and St Bride's Avenue to the east would be linked by the North Passage.
40. The scheme's approach to height and massing is broadly supported. Overall the proposed scheme would be taller than the existing buildings on and close to the site; notwithstanding this, it would relate well to its surroundings including nearby listed buildings. The height steps up from the court building on Fleet Street to the

police building (the tallest element of the development) and then down for the commercial building given its proximity to the listed The Harrow Public House.

Public realm

41. An expanded public realm, two new routes across the site and the widening of footways on Fleet Street, Whitefriars Street and Salisbury Court are proposed. As stated earlier in this report, the relocated Waithman Obelisk would occupy a prominent location within the public square and aid in identifying the new east-west orientated South Passage route proposed. In addition, the expanded public square would feature increased planting and additional benches and well-overlooked by the police and commercial buildings. The North Passage would be well-activated and short-stay cycle parking, water features and vertical planting provided. Trees, a green wall and a lift would characterise the South Passage. On the Fleet Street frontage, opportunities for public art are proposed. The proposals for the public realm are strongly supported in line with Policy D8 of the London Plan. Nevertheless, consideration should be given to the provision of at least one free drinking water fountain in line with Policy D8 of the London Plan.
42. In view of the proposed police and judicial uses, a number of safety features have been incorporated into the design of the public realm such as hostile vehicle mitigation (HVM) and a blast-proof secure wall. This accords with London Plan Policy D11 and is welcomed.

Appearance

43. The approach to materials is welcomed, especially the use of Portland stone for the court building, which is strongly supported. The Corporation's planning officers should seek to secure a high quality of design through conditions linked to facade details and additional material specification; and the officers should also consider securing the retention of the architect throughout the build project via a Section 106 to ensure continuity and quality of design.

Fire safety

44. In accordance with Policy D12 of the London Plan, fire statements should be submitted with all major development proposals. These should be produced by a third-party independent chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or suitably qualified and competent professional, with the demonstrable experience to address the complexity of the design being proposed. The application is accompanied by a fire strategy prepared by suitably qualified personnel at AECOM, which sets out how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. The measures contained within the statement should be secured by the Corporation via planning condition/s.

Inclusive access

45. London Plan Policy D5 seeks to ensure that proposals achieve the highest standards of accessible and inclusive design. The scheme's access strategy considers people with mobility, visual and cognitive impairments, the deaf, elderly and small children. Access routes, entry points, and movement within the building and across the site have been designed to be accessible in line with Policy D5. In addition, accessible WC are proposed in appropriate numbers and locations across the development for both the occupants' and public's use as well as baby changing

facilities and a changing places toilet. The Corporation should ensure that the surface materials used across the public realm are durable, slip resistant and conducive to wheelchair users and people with walking aids. Seating proposed in the public realm should be of varying heights, with and without back and arm rests.

Transport

Healthy Streets, vision zero and pedestrian comfort levels (PCL)

46. The proposal is supported by a transport assessment (TA) following the latest TfL guidance, including Healthy Streets, and an active travel zone (ATZ) assessment. In accordance with London Plan Policy T2, the TA demonstrates how the proposed development would deliver improvements that support the ten Healthy Streets Indicators. The high priority given to travel by active and sustainable modes is also welcomed. A full Travel Plan should be secured by condition.
47. As set out earlier in this report, the development proposes a range of public realm improvements that are strongly supported. All highway works proposed should be secured and follow design guidance from the TfL Streets toolkit and cycle route quality criteria. Legible London Signs should be incorporated into the Salisbury Square design and existing ones within the site's vicinity should be updated. The applicant should also consider the recommendations of the stage 1 Road Safety Audit (RSA) for the final design and mitigate any safety risks and deliver measures accordingly.
48. In terms of PCL, the proposed hostile vehicle mitigation measures may potentially create pinch points or reduce pedestrian level of service; therefore, the applicant must undertake a pedestrian comfort level assessment to ensure existing pedestrian movements (as well as additional demand) would be accommodated effectively and safely. Additionally, part of the footway on the site's Fleet Street frontage is expected to have PCL downgraded to C+ as the result of the proposal; this needs to be mitigated to a level no worse or better than the existing PCL of B+ or above in line London Plan Policies T2 and D8.

Trip generation, public transport impact and highway works

49. The proposed trip rates and station impact for new travel expected to be generated by the new development are likely to be acceptable in principle. However, this should be confirmed by a full line load impact assessment using TfL's Rail Plan data.
50. The applicant proposes various highway improvements and changes to support the development, including a northbound cycle lane extension and relocation of the on-street parking on the eastern carriageway. A new traffic island on Dorset Rise (south of the site) and Salisbury Court are also proposed. This is supported in accordance with London Plan Policies, T3, T4 and T5. A reduction in the width of footways to enable carriageway widening at the southern end of Whitefriars Street is proposed in order to facilitate rapid response vehicles and provide a secondary point of access to the wider highway network. The safety impact to non-motorized vulnerable road users, especially those using the existing cycle route on Whitefriars Street, should be assessed. The removal of existing on-street parking on Whitefriars Street is welcomed and traffic calming measures and signage around entry/ egress passage points should be maintained to uphold highway safety.
51. Due to the need for enhanced security, the existing Shoe Lane bus stop (Stop H) would need to be relocated to the east of the junction with Salisbury Court. Further

discussion is required between the applicant, City of London and TfL to agree the location and design of the new stop. The works to deliver the relocated bus stop should be secured by legal agreement and all costs covered by the applicant.

Parking and cycling

52. The proposed car-free nature of the development, except for 3 Blue Badge and operational parking spaces, is welcomed in line with London Plan Policy T6. Dorset Rise has been identified as a suitable location for additional on-street Blue Badge provision and this is acceptable. An on-street pickup/drop-off solely for use by disabled persons (managed appropriately to restrict wider public use) is however recommended. The operational vehicle and Blue Badge car parking spaces should all be equipped with active electric vehicle charging points.
53. A total of 328 long-stay cycle parking spaces, a cycle hub with 125 spaces and adequate changing facilities are proposed; this is supported in line with London Plan Policy T5. Notwithstanding this, the provision of parking for operational police cycles is strongly encouraged. In addition, cycle lifts should cater for at least two cycles per lift to reduce wait times. Regarding short-stay parking, 56 spaces are proposed within Salisbury Square public realm and close to building entrances. This provision is less than the minimum standards required by the London Plan and should be revised accordingly. All cycle parking design should accord with London Cycling Design Standards (LCDS) standards in line with London Plan Policy T5; and at least 5% of cycle parking should be suitable for larger and adapted cycles. The detailed design and delivery of all cycle parking should be secured by condition.
54. The proposed cycle improvements would enhance strategic cycling connections and are welcomed in accordance with London Plan Policy T5. New and updated signage for these routes should be secured. The nearest Cycle Hire docking station is located 110 metres away, along Bouverie Street and along with other nearby stations is in high demand and as such the proposal would increase demand for cycle hire in the vicinity. Therefore, a contribution of £220,000 to fund a new docking station of at least 30 docking points is sought. With respect to location, TfL would undertake to discuss and agree with the Corporation. In the absence of a suitable site, the funding sought would be used to increase capacity at existing stations.
55. A parking design and management plan should be secured by condition in accordance with London Plan Policy T6. This plan should include details for the design and management of all operational and Blue Badge parking, including cycle parking that complies with London Plan Policy T5.

Delivery and servicing

56. The proposed off-site consolidation centre is strongly supported in line with London Plan Policy T7. However, delivery and servicing outside proposed hours should be provided; this will require robust estimates on the expected vehicles and demonstrate how the impact on vulnerable road users will be minimised. The e-cargo bike spaces proposed within the Salisbury Square are supported, subject to confirmation of parking details. These spaces should be secured by condition. A full deliveries and servicing plan should be secured by condition.

Construction

57. A full construction logistics plan should be secured by condition and all proposals in this plan should support the Mayor's Vision Zero Action Plan. Construction routes are proposed, which cross the TLRN; therefore, local pedestrians' and cyclists' safety should be considered. Furthermore, construction activities must ensure bus movements and traffic flow on Fleet Street would not be compromised. The number of construction vehicles proposed accessing and egressing onto the TLRN and SRN is concerning. Further discussion on construction routing is therefore welcomed.
58. Proposed construction access/egress routes should be supported by a Stage 1 RSA to determine the safety of vehicle movements in line with the Mayor's Vision Zero agenda. Arrangements should be put in place to maintain the safe and efficient operation of bus services along Fleet Street at all times. The impacts due to construction on the adjacent bus stop and timing and arrangements for its relocation should be agreed with TfL.

Sustainable development

Energy strategy

59. The applicant has submitted an energy assessment in accordance with London Plan Policy SI2. An on-site reduction of 324 tonnes of carbon dioxide per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected for the new build element of the proposal. This is equivalent to an overall saving of 49%. For the refurbished element, a reduction of approximately 37 tonnes of carbon dioxide per year, an overall saving of 63%, is expected. Further information is required in relation to Be Lean, overheating, District Heating Network (DHN) futureproofing, heat pumps and seasonal efficiencies and distribution. Given the shortfall in carbon reduction for the new build, a carbon offset payment is required. In calculating this payment, the new carbon cost should be applied as well as the net zero carbon target for non-residential developments. Full details of the outstanding issues associated with energy have been provided directly to the applicant and Corporation.

Whole Life-cycle Carbon (WLC) assessment

60. The applicant has submitted a WLC assessment as required by London Plan Policy SI2. The assessment is generally supported, with applicant has provided all information within the project details section of the template under the detailed planning stage, in line with the GLA Whole Life-Cycle Carbon Assessment guidance document and the assessment method conforming with BS EN 15978 and 'RICS Professional Statement and guidance, Whole Life carbon assessment for the built environment' (RICS PS). Estimated WLC emissions (Assessment 2), key action and further opportunities to reduce whole life-cycle carbon emissions and material Quantity, assumptions and end of life scenarios have been satisfactorily addressed. Further information, however, relating to the estimated WLC emissions (Assessment 2) is required. Full details of the outstanding issues associated with the WLC assessment have been provided directly to the applicant and Corporation.

Circular economy

61. In accordance with Policy SI7 of the London Plan a circular economy statement has been submitted with the application. Apart from the applicant having to provide a

post-completion report to the GLA, the measures set out in the circular economy statement are acceptable in line with Policy SI7.

Urban greening

62. Policy G5 of the London Plan emphasises the importance of urban greening in development. Acceptable urban greening features include new planting in the public realm, green roofs, green walls and nature-based sustainable drainage. The greening strategy proposed for the development is comprised primarily of extensive and intensive green roofs, green walls and tree planting and the urban greening factor (UGF) score is 0.28. This is slightly below the 0.3 target set for non-residential developments in Policy G5 of the London Plan; however, given the highly urbanised location and the quality of the proposal the greening strategy is acceptable.

Sustainable drainage and flood risk

63. The majority of the application site is located in Flood Zone 1, with a small part in Flood Zone 2. A flood risk assessment (FRA) has been submitted in line with the NPPF and Policy SI12 of the London Plan, which requires development proposals to ensure that flood risk is minimised and mitigated and residual risk addressed. The FRA adequately assesses the risk of flooding from a range of sources. When mitigation measures are considered, the residual flood risk to the site is low. The approach to flood risk management for the proposed development complies with London Plan Policy SI12.
64. In terms of surface water management, rainwater harvesting, green roofs and geo-cellular attenuation tanks are the SuDS measures proposed. Restricted flows will be released into the public sewer through control devices and pumps. This approach is acceptable in line with London Plan Policy SI13.
65. Regarding water efficiency, the sustainability statement states that the development would achieve a water reduction of at least 50% through the utilisation of low flush toilets, low flow showers and wash hand basins. This reduction equates to 4 points under the BREEAM water consumption credit and complies with the requirements of London Plan Policy SI5.

Equality

66. The St. Bride's Church is located close to the application site. Good Growth Objective GG1 highlights the diverse nature of London's population and underscores the importance of building inclusive communities to guarantee equal opportunities for all, through removing barriers to, and protecting and enhancing, facilities and services that meet the needs of specific groups and communities. More generally, the 2010 Equality Act places a duty on public bodies, including the GLA, in the exercise of their functions, to have due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it. This requirement includes removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic and taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it. The Act defines protected characteristics, which includes religion and belief.
67. The application is supported by an equality impact assessment, which considers the St. Bride's Church. This assessment concludes that the impact on the Church

would be neutral. It is understood, however, that St Brides Church has submitted a written representation requesting specific conditions and the applicant has provided a response. GLA officers, mindful of obligations under the Equality Act 2010 as well as the requirements of London Plan Policy D13, expect the requested conditions to be agreed prior to the Mayor's decision-making stage.

Local planning authority's position

68. City Corporation planning officers are currently assessing the application. In due course the Corporation will formally consider the application at a planning committee meeting.

Legal considerations

69. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Corporation must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Corporation under Article 6 of the Order to refuse the application.. There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

70. There are no financial considerations at this stage.

Conclusion

71. London Plan policies on the Central Activities Zone, social infrastructure, heritage, urban design, inclusive access, transport and sustainable development are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- **Principle of development:** 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 Policies S1, SD4 and SD5 and Good Growth Objective GG1.
- **Heritage, strategic views and urban design:** 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.
- **Transport:** 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.

- **Sustainable development:** 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.

For further information, contact GLA Planning Unit (Development Management Team):

Andrew Payne, Senior Strategic Planner (case officer)

email: andrew.payne@london.gov.uk

Lyndon Fothergill, Team Leader – Development Management

email: lyndon.fothergill@london.gov.uk

Allison Flight, Deputy Head of Development Management

email: alison.flight@london.gov.uk

John Finlayson, Head of Development Management

email: john.finlayson@london.gov.uk

Lucinda Turner, Assistant Director of Planning

email: lucinda.turner@london.gov.uk



LPA Ref: 20/00997/FULEIA

London City Airport Ref: 2021/LCY/010

Date: 25/01/2021

Dear Catherine Evans,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found not to conflict with London City Airport's current safeguarding criteria.

LPA Reference	20/00997/FULEIA
Proposal	<p> 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</p>

	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
Location	Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars St London, EC4Y
Borough	City of London
Case Officer	Catherine Evans
Maximum Proposed Height AOD	68m

Observation:

London City Airport suggests that any construction cranes participating in the project should be advised to the CAA AROPS team who will consult with the relevant aerodrome stakeholders.

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

If you need guidance, templates, documents or have any queries please contact safeguarding@londoncityairport.com

Kind regards,
Szilvia Turcsik
Technical Operations Coordinator

Corporation of London
Department of Planning & Transportation
MARCH21
PO Box 270
Guildhall
London
EC2P 2EJ

Our DTS Ref: 64437
Your Ref: 20/00997/FULEIA - Updated

30 March 2021

Dear Sir/Madam

Re: FLEETBANK HOUSE 2-6, SALISBURY SQUARE, LONDON, -, EC4Y 8JX

Waste Comments

Water Comments

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. 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.

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%7C71281c082ea54bfe66d208d8f36e3510%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637527001953455153%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C1000&sdata=dxQCYxn3MD7ENKN0B30glm0QQq3dxlyxBnu0imwfuj8%3D&reserved=0>

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://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%7C71281c082ea54bfe66d208d8f36e3510%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637527001953455153%7CUnknown%7CTWFpbGZsb3d8eyJWlloiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C1000&sdata=dxQCYxn3>

[MD7ENKN0B30gIm0QQg3dxlyxBnu0imwfuj8%3D&reserved=0](#). Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Supplementary Comments

There is no update to the drainage strategy and therefore our comments remain the same as previous.

Yours faithfully

Development Planning Department

Development Planning,

Thames Water,

Maple Lodge STW,

Denham Way,

Rickmansworth,

WD3 9SQ

[Tel:020 3577 9998](tel:02035779998)

Email: devcon.team@thameswater.co.uk

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [REDACTED]
Subject: Re: Potential spam Planning Application Consultation: 20/00997/FULEIA
Date: 29 March 2021 17:15:02

Dear Catherine Evans

Thank you for sharing the updated plans for the Sailsbury Square (et al) development which looks exciting for the area.

In reading the documents I noted in the cultural plan we are referenced (St Bride Foundation), are you able to let me know who was spoken to and when this happened as it is not something I am aware of or recall. I am not sure if the common confusion with ourselves and the Church has been made. We are two separate organisations; we have a history and a working relationship but very separate management and purpose. I'd be happy to speak to some to update any information if this is helpful. If possible, I'd like to make sure our Theatre (Bridewell Theatre) is also included and acknowledged as part of the local cultural offer.

Re the plan development, as we are a little further away, we have no obvious concerns about the finished development (we did question the disabled parking and vehicular access for deliveries, weddings and step free access but have been reassured by speaking to St Bride's Church this will be ok).

However, we do have some concerns and questions about the build phase:

Step free access route via St Brides Passage.

Although our postal address leads to Bride Lane our main circulation area is our 1st floor and uses St Bride's Passage, from Sailsbury Court, as our step free access route for those that require for disability needs but also as a flow for events and weddings (55% of income). After speaking to St Bride's Church, I know that they will have access from Sailsbury Court, but I am looking for reassurance that this access will extend to the entrance to ourselves via St Bride's Passage (next to 10 Sailsbury Court).

Vehicular access from Sailsbury Court (to step free access via St Bride's passage)

As noted above we require those that need to access the Foundation, via our entrance on St Bride's Passage, for Step free access which may include arriving by vehicle. This access is also required Weddings and Deliveries - inc catering daily. Again, I understand from the Church they have reassurances for the vehicular access they require but will this also apply to St Bride Foundation via St Bride's Passage.

Noise/vibrations

As we are that bit further away, I am unsure if the noise and vibrations will have an impact of the Foundation but ask that we are supplied with methods of communicating any issues. We are operational 7 days a week (theatre, weddings, evening and weekend events) as well as having a residential tenant (on the St Bride's passage side of the building). Also, as we are grade II listed building approaching our 130th anniversary if there is a possible impact how will this be monitored, and any issues reported?

Emergency access to Dorset Buildings

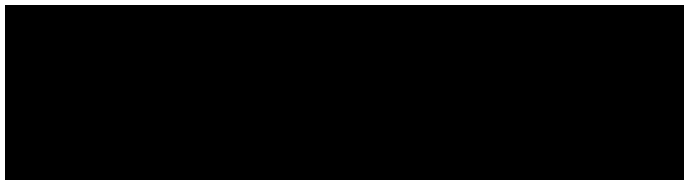
Finally, I would hope that this is covered in emergency access planning, we have a fire exit from our Theatre on Dorset Buildings which also offers access to the building for Fire crews to the rear of the building. Will Dorset Buildings still be accessible if required?

Please do not hesitate to contact me if you have any questions.

Many thanks

Alison

Alison Lee
Foundation Manager



Address: St Bride Foundation, Bride Lane, Fleet Street, London EC4Y 8EQ
Reg Charity: 207607

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: 15 March 2021 14:43



Subject: Potential spam Planning Application Consultation: 20/00997/FULEIA

Dear Sir/Madam

Please see attached consultation for Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street, London, EC4Y .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Catherine Evans
Department of the Built Environment
City of London

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From: [Seana Heaney](#)
To: [PLN - Comments](#)
Cc: [TownPlanningAnglia](#)
Subject: Network Rail Consultation Response: 20/00997/FULEIA - Land bounded by Feet Street Salisbury Court Salisbury Square Primrose Hill & Whitefriars Street London
Date: 31 March 2021 10:36:50
Attachments: [image001.png](#)

OFFICIAL

Dear Sir/Madam,

Thank you for consulting Network Rail regarding the above application.

After reviewing the associated information, I would like to inform you that Network Rail have no objections to the proposals.

Kind regards,



Seana Heaney
Town Planning Technician
Network Rail Property (Eastern Region - Anglia)
A: 1 Stratford Place | London | E15 1AZ
M 07395 390449
E seana.heaney@networkrail.co.uk
W www.networkrail.co.uk/property

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From: [Evans, Catherine](#)
To: [PLN - Comments](#)
Subject: FW: Fleet Street Estate /Salisbury Square 20/00997/FULEIA
Date: 01 April 2021 12:57:41

From: Varma, Vimal <Vimal.Varma@cityoflondon.gov.uk>
Sent: 31 March 2021 11:58
To: Bush, Beverley <Beverley.Bush@cityoflondon.gov.uk>
Cc: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>
Subject: RE: Fleet Street Estate /Salisbury Square 20/00997/FULEIA

Hi Both,

So sorry for the delay.

The proposed waste storage and collection facilities indicated in the Operational Waste Management Plan, December 2020 Rev 00 , complies with our requirements. This Division will, therefore, raise no objections to this application.

Thanks

Vimal

From: Bush, Beverley <Beverley.Bush@cityoflondon.gov.uk>
Sent: 22 March 2021 11:01
To: Varma, Vimal <Vimal.Varma@cityoflondon.gov.uk>
Cc: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>
Subject: Fleet Street Estate /Salisbury Square 20/00997/FULEIA
Importance: High

Hi Vimal,

I hope you are well.

Catherine and I preparing the Fleet Street Estate application for committee on the 22nd April. We need your response to the consultation (sent on 11th January 2021) on the waste facilities

for the Court, Police and Commercial building urgently this week for inclusion in the report. If you need any further information please just contact either Catherine or I.

Kind regards

Beverley

Beverley Bush

Principal Planning Officer

Development Division

Department of the Built Environment

City of London

I am working remotely but can be reached on

07810 814939 beverley.bush@cityoflondon.gov.uk

(Please note I do not work on Mondays)

www.cityoflondon.gov.uk



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