

From: [Devcon Team](#)
To: [Pin - CC - Development Dc](#)
Subject: 21/00116/FULMAJ - CITY TOWER AND CITY PLACE HOUSE, 40-55 BASINGHALL STREET, LONDON, EC2V 7HR
Date: 20 April 2021 11:31:48

Corporation of London Department of Planning & Transportation PO Box 270 Guildhall London EC2P 2EJ Our DTS Ref: 69229 Your Ref: 21/00116/FULMAJ
20 April 2021

Dear Sir/Madam

Re: CITY TOWER AND CITY PLACE HOUSE, 40-55 BASINGHALL STREET, LONDON, EC2V 7HR

Waste Comments

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

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

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://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

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

Yours faithfully

Development Planning 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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From: [Delves, Gemma](#)
To: [Devlia, Neel](#)
Subject: FW: City Place House- Application Ref 21/00116/FULMAJ
Date: 17 June 2021 17:04:45

From: Hegarty, Patrick <Patrick.Hegarty@cityoflondon.gov.uk>
Sent: 28 May 2021 18:08
To: Delves, Gemma <Gemma.Delves@cityoflondon.gov.uk>
Subject: RE: City Place House- Application Ref 21/00116/FULMAJ

Gemma,

The proposals to remove and replace the three trees on Basinghall Street are satisfactory. The trees will be overhung by the building but the soffit height is approximately 12 m above the ground which will allow enough height for appropriately selected species to develop and as this is the south side of the building there will be enough light for the proper growth of the trees. The exact tree planting positions, species selection and detailed design, will need to be approved either through a Condition or be dealt with through a S278 agreement.

The Brewers' Hall Garden site is shown indicatively in the application as being replanted and with an increase to the area of planting. Improvements to the appearance to the existing structures and additional seating are also proposed. The existing trees are to be retained here. The Developer is to provide £200k through a S106 agreement, towards the costs of this work which will be undertaken by the City. This will allow the details of the design to be developed by the City. The amount is not envisaged to allow for any significant reordering of the vents and underground structures associated with the underlying electricity substation, etc. There is potentially the opportunity to redesign this garden in conjunction with the emerging public realm project associated with St Paul's / Museum Gyratory area project, which extends along London Wall.

We welcome the general improvements to the public realm and increased permeability of the site from London Wall through to Basinghall Street and beyond. I understand the detailed design of the City Tower Podium will take into consideration public safety and allow for passive surveillance of the residual public realm landscaping, particularly to the east of City Tower.

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

GREATER **LONDON** AUTHORITY
Good Growth

Gemma Delves
City of London
By Email

Our ref: 2021/0473/S1
Your ref: 21/00116/FULMAJ
Date: 01 June 2021

Dear Gemma Delves

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

City Tower And City Place House 40 - 55 Basinghall Street London EC2V

Local Planning Authority reference: 21/00116/FULMAJ

I refer to the copy of the above planning application, which was received from you on 22 April 2021. On 1st June the Mayor considered a report on this proposal, reference 2021/0473/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.

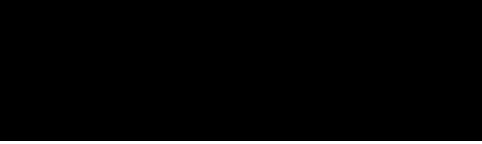
The Mayor considers that the application does not yet comply with the London Plan for the reasons set out in paragraph 97 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

If your Council 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 Council 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 Council resolves to refuse permission it need not consult the Mayor again (pursuant to Article 5(2) of the Order), and your Council 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 Gavin McLaughlin, email: gavinmclaughlin@tfl.gov.uk, telephone: 07792643608

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
 TfL
 Mike Worthington, Agent, DP9

City Tower And City Place House 40 - 55 Basinghall Street London EC2V

Local Planning Authority: City of London

local planning authority reference: 21/00116/FULMAJ

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 the existing building and structures at 55 Basinghall Street and the erection of a Class E building comprising commercial, business and service uses; creation of a new pedestrian route through the site; landscaping works, including alterations to the public highway; part demolition of basement, lower ground, ground and mezzanine floors of 40 Basinghall Street with creation of Class E ground floor units and associated minor connection works to 65/65a Basinghall Street associated with the removal and re-instatement of the City Walkway

The applicant

The applicant is **Knighon Estates Limited** and the architect is **Morrison and Allies**

Strategic issues summary

Land use principles: The proposed intensification of the site for office led development with retail functions at lower floors is consistent with the CAZ and acceptable in principle subject to further consideration of flexible and affordable workspace. (paras. 18-25)

Urban Design/LVMF: The overall design approach is complementary to local context and is acceptable subject to some clarification on the materiality on the upper floors of the proposed 2 Aldermanbury Square building. The public realm is much improved and there is negligible impact to the protected views of Westminster Pier to St Paul. (paras. 26 - 46)

Heritage: There is some small scale, less than substantial harm identified to the Guildhall, however on balance the public benefits of the scheme with the much enhanced public realm and local pedestrian connectivity could be considered to outweigh the less than substantial harm identified to the significance of the Grade I listed Guildhall. This harm could be further diminished by confirmation of a more neutral colour pallet to backdrop of the Guildhall spire. GLA officers will conclude the balancing exercise once the final package of public benefits is confirmed at Stage II (paras. 47 - 54)

Transport: The proposed development broadly complies with the London Plan subject to clarification over cycle parking/facilities, a pedestrian comfort level assessment, contributions towards wayfinding and strategic cycle network and provision of construction logistics plan and road safety audit (paras. 55 - 76)

Sustainable Development: Further information is required to ensure the development is consistent with the objectives of the London Plan with regards to Energy, Whole Life Carbon Cycle, Circular Economy/Waste, Urban Greening, Biodiversity, Drainage and Air Quality. (paras. 77 - 93)

Recommendation

That City of London 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 98. Where the associated concerns within this report are addressed, the application may comply with the London Plan / become acceptable in strategic planning terms.

Context

1. On 22 April 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/categories of the Schedule to the Order 2008:
 - 4 *“Development in respect of which the local planning authority is required to consult the Mayor by virtue of a direction given by the Secretary of State under article 10(3) of the GDPO. (Development within a London View Management Framework Area)”*
3. Once 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. In this case, the Corporation need not refer the application back to the Mayor if it resolves to refuse permission.
4. The Mayor of London's statement on this case will be made available on the City Hall website: www.london.gov.uk.

Site description

5. The site consists of two office blocks in the City of London, 55 Basinghall Street (City Place House) and 40 Basinghall Street (City Tower), between Basinghall Hall Street to the south and London Wall to the north. The site is bound at ground and podium level with Brewers' Hall and Aldermanbury Square neighbouring the site the west and Girdlers' Hall neighbouring to the east. To the immediate north of London Wall, is the recently developed London Wall Place development. The Site is 0.6 hectares (ha) in area.
6. Locally designated open space Brewers Hall garden lies to the east of the site, the elevated Basinghall high walk is locally designated open space within the site and a further designated open space is immediately to the east of City tower.
7. The site is not within a conservation area. However, there are a number of listed properties in the vicinity. Immediately to the south of the site is the Grade II listed 65/65a Basinghall Street to which the development wishes to redevelop an existing elevated walkway and immediately to the southwest is Grade II listed 20 Aldermanbury with the Grade I listed Guildhall further south. To the north lies Grade II listed remains of the former Church St Alphage. The neighbouring Brewers' Hall and Girdlers' Hall are not listed but the Brewers Hall does benefit from a Certificate of Immunity.
8. Overall the site benefits from a Public Transport Access Level (PTAL) of 6b, the best available on a scale ranging from 1 to 6b. The nearest station is Moorgate station which is approximately 400 metres to the north east of the site and provides

access to a number of Underground and National Rail services. Bank station is located within 500 metres and provides access to both Underground and National Rail services. A new Elizabeth Line station is to be opened at Liverpool Street, with entrances and ticket halls at both Moorgate and Liverpool Street. There are a number of bus stops located close to the Site, with several bus services operating 24-hour services. The nearest stops N and A are located directly on London Wall and are approximately 130m away. Quietway 11 runs 150 metres to the west providing good access to the strategic cycle network.

Details of this proposal

9. It is proposed to demolish the existing building at 55 Basinghall Street (City Place House) and replace this with a new 12 storey building (69.5 metres AOD) to be known as 2 Aldermanbury Square, comprising commercial, business and service uses. In addition, the partial demolition of the basement, lower ground and ground floors of 40 Basinghall Street (City Tower) is proposed to facilitate the creation of commercial, business and service uses. The quantum of development proposed is set out below:

2 Aldermanbury Square (55 Basinghall Street)

Use Class	Floor Level	NIA (sq m)	GIA (sq m)	GEA (Sq m)
Commercial, Business & Service Use (Class E)	G	139	160	175
Offices (Class E)	L01-L12 B1,B2	29,641	43,112	45,704
TOTAL		29,780	43,272	45,879

40 Basinghall Street

Use Class	Floor Level	NIA (sq m)	GIA (sq m)	GEA (Sq m)
Commercial, Business & Service Use (Class E)	G, L01	875	1,406	1,549
Offices (Class E)	B2, B1, G, L01	121	1,407	1,549
TOTAL		996	2,813	3,240

10. The proposals would create net gain of 18,565 sqm of office space.
11. A new route connecting London Wall with Basinghall Street will be created by demolishing an element of the existing podium. At ground floor and mezzanine level new flexible commercial units under Class E will be introduced (currently labelled retail on floorplans). An element of existing office use is also retained.
12. It is proposed to enhance the open spaces and public realm in and around the development with improved landscaping and accessibility.
13. The development would provide long term cycle parking for the users of the buildings and some short term on street visitor cycle parking.

Case history

14. No previous case history. However, in addition to this application, a separate listed building consent application is submitted to the LPA which relates to the connection

of the raised walkway on the south side of Basinghall Street into the grade II listed 65/65a Basinghall Street. Listed building consent is sought for: '*Partial demolition of and associated works to 65/65a Basinghall Street to allow for the removal of the existing City Walkway bridge and installation of new City Walkway bridge to be delivered as part of the redevelopment of 55 Basinghall/40 Basinghall Street.*'

Strategic planning issues and relevant policies and guidance

15. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the City of London Local Plan (2015); and, the London Plan 2021.

16. The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;
- Draft City Plan 2036 (reg 19 Consultation March 19th – 10th May 2021)
- City of London SPGs/SPDs

17. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

- Good Growth London Plan;
- World City role London Plan;
- Economic development *London Plan; the Mayor's Economic Development Strategy; Employment Action Plan;*
- Central Activities Zone *London Plan;*
- Retail / Office *London Plan;*
- Urban design *London Plan; Character and Context SPG; Public London Charter draft LPG;*
- Strategic views *London Plan, London View Management Framework SPG;*
- Heritage *London Plan; World Heritage Sites SPG;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter draft LPG*
- Sustainable development *London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; 'Be Seen' Energy Monitoring Guidance draft LPG; Mayor's Environment Strategy;*
- Air quality *London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG;*
- Ambient noise *London Plan; the Mayor's Environment Strategy;*
- Transport and parking *London Plan; the Mayor's Transport Strategy;*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; Crossrail Funding SPG; Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG;*
- Equality *London Plan; the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG;*

Land uses principle

18. The site is located within the Central Activities Zone (CAZ), where the Mayor encourages the increase of office floorspace as part of a mix of uses, as set out in London Plan Policy SD4. The London Plan strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City.
19. London Plan Policy SD4 'The Central Activities Zone' states that the vitality, viability, adaptation and diversification of CAZ retail clusters, including locally orientated retail and related uses should be supported.
20. London Plan Policy SD5 Plan seeks to give greater weight to office and other commercial CAZ functions.
21. London Plan Policy E1 seeks improvements to the competitiveness and quality of office space through new office provision and mixed-use developments, with increases to the current stock of offices to be supported specifically within the CAZ in addition to improvements to walking, cycling and public transport connectivity.
22. London Plan Policy E2 supports the provision of a range of Use Class B (now within use class E) business space, in terms of type, use and size, at an appropriate range of rents, to meet the needs of micro, small and medium-sized enterprises (particularly where more than 2,500 sqm of Use Class B floorspace is proposed). A range of commercial sized units would be provided on ground floor although predominantly to be retail use in function. The Corporation should ensure there is range of spaces to support businesses of various sizes.
23. There is limited information accompanying the submission in regard the requirements of London Pan Policy E2 D for affordable workspace.
24. London Plan Policy D3 seeks to optimise delivery through the design-led approach, making the best use of land
25. The proposed land uses are acceptable subject to further work that shows consideration that the provision of a range of office spaces and affordable workspace has been considered consistent with the requirements of London Plan Policies E2 and E3.

Urban design

26. 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.

Optimising development capacity

27. London Plan 2021 Policy D3 also seek to optimise the potential of sites, having regard to local context, design principles, public transport accessibility, and capacity of existing and future transport services. The site has good accessibility to public transport and the location within CAZ. In this instance, the higher density office-led mixed use scheme is considered appropriate for the locality and is supported.

Development layout

28. The development would provide active frontage along ground floor elevations and improved legibility and accessibility through the development and public right of way and open spaces. The layout is acceptable.
29. The Corporation must be satisfied that the layout and servicing of the commercial units can be achieved in a practical manner that does not impede upon highway activities.

Scale and massing

30. London Plan policy D9 states that development plans should define what is considered a tall building for specific localities (although not less than 6 storeys or 18 metres) and identify suitable locations; and identify any such locations and appropriate tall building heights on maps in Development Plans.
31. The City Plan defines tall buildings as, "*those which significantly exceed the height of their general surroundings*" (Paragraph 3.1.4.1). Strategic Policy S12 of the draft City Plan relates to tall buildings and tall buildings in the City are defined as 75m AOD. The proposed development would not increase the height of the existing City Tower and the redeveloped 55 Basinghall would be 69.5m AOD (under 75m in height and not significantly taller than the surrounding context) therefore the proposals do not constitute tall buildings within the meaning of London Plan Policy D9.
32. With regards to overall height and massing this is considered appropriate to this city location context with good use of recessed balconies which help break up the apparent mass of the development. The use of struts underpinning the upper storeys and widening of footpath increases sense of spaciousness at pedestrian level compared to the more overbearing form of development currently.
33. The TVIA / LVMF analysis submitted in support of the application suggests that building will sit comfortably in its surroundings. The general layout and massing approach is supported and the proposals improve on the quality of existing public realm and local permeability which is welcomed.

Public realm

34. London Plan Policy GG1 seeks to ensure streets and public spaces can be enhanced and enjoyed safely. The proposals offer significant public improvements in the legibility and accessibility of the site with improvement works to the locally designated open spaces improving the character and appearance of the area.
35. The majority of the ground floor public realm will be covered by building overhangs although this is recognised as a characteristic of the site's immediate context, such as the covered high level walkways linking London Wall with the Barbican, nonetheless this represents a substantial improvement given the lack of linkage between London Wall and Basinghall Street and nature of the existing pedestrian routes along London Wall which are much enclosed and uninviting spaces. The podium and Brewers all gardens public space is much enhanced with planting and seating areas.
36. Improvements to the public realm should be secured through appropriate s106/s278 agreements.

Healthy Streets

37. In accordance with Policy T2 (Healthy Streets), the proposals include new public realm and highway works which would improve the site and surrounding area against the Healthy Streets indicators, primarily through new greening, active frontages and widened footways.
38. A new, direct street level link between Basinghall Street and London Wall is proposed within the site, which is strongly supported. Flexible commercial units are proposed at the ground floor of both new buildings, which would introduce new active frontages along London Wall to the north.
39. The footway along the south side of London Wall is proposed to be widened to over 5 metres, improving its PCL.
40. New pedestrian routes are proposed at both ground and elevated levels, and a new public garden at podium level, able to host cultural events and connected to ground level by a new public lift and staircase. The new elevated route proposed across London Wall would be step-free, whereas the current City Walkway can only be accessed by stairs.
41. The applicant should clarify whether cyclists will be able to access the new elevated walkway using the lift with their bikes. The new north-south pedestrian route proposed should become a shared space for walking and cycling, subject to further redesign and a Stage 1 Road Safety Audit (RSA) and Designer's Response prior to determination. This should be shared with TfL officers for approval. The applicant should also clarify how all new public realm will remain publicly available, through adoption as highway or section 106 as applicable.

Architectural quality

42. The architectural quality is considered to respond well to this predominantly office location context. The architecture has been developed in close collaboration with City of London Corporation officers, with emphasis placed on quality of materials and detailing which is welcomed, there are no strategic concerns in this regard.

Fire safety

43. In line with Policy D11 and D12 of the London Plan, development proposals must achieve the highest standards of fire safety. As such, development proposals should be accompanied by a fire statement (prepared by a suitably qualified third party assessor) demonstrating how the development proposals 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. Additionally, London Plan Policy D5 seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings. A fire statement in line with the above requirements should be secured by planning condition prior to any Stage II referral.

Inclusive access

44. The proposal intends to respond positively to Policy D5 of the London Plan. In line with London Plan Policy D5, inclusive design and access shall be incorporated into the communal podium courtyard gardens, roof terrace areas, cycle and refuse store

areas to be secured by condition by the Corporation. Improved accessibility is provided with a public lift between the high walk/podium garden and the street level.

London View Management Framework (LVMF)

45. The Mayor has identified a list of strategic views London Plan policy HC3, which include significant buildings or urban landscapes which help to define London at a strategic level. Policy HC4 of the London Plan seeks to protect these strategic views and require proposals to make a positive contribution to the composition of the views and their landmark elements.
46. The site is located within the Landmark Background Assessment Area of the Westminster Pier to St Paul's viewing corridor (LVMF 8A.1). The submitted view impact assessment shows the building would marginally appear to the left hand side of St Paul's (when viewed from Westminster Pier). The proposed development would not create additional height or mass within the strategic view given the silhouette of development created by 21 Moorfields. The proposals would have negligible impact on the strategic view does not compromise the strategic aims of the London View Management Framework.

Heritage

47. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to 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' and in relation to conservation areas, special attention must be paid to 'the desirability of preserving or enhancing the character or appearance of that area'.
48. The NPPF states that when considering the impact of the proposal 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. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting.
49. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. London Plan Policy HC1 states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.
50. The impact of the proposals on the settings of the listed buildings and their significance, identified in the THVIA have been fully assessed and taken into consideration. These include:
 - The Guildhall, Grade I - List entry 1064675

- Church of St Lawrence Jewry, Grade I - List entry 1064673
- 65-65A Basinghall Street, Grade II - List entry 1454179
- 20 Aldermanbury, Grade II, List entry 1428998
- Remains of Tower of St Alphage Church, Grade II - List entry 1193558
- Former Guildhall Library and Museum, Grade II* - List entry 1064744
- 13-14 Basinghall Street, Grade II - List entry 1287060
- the Barbican Estate, Grade II* (Park and Garden) – list entry 1001668
- Wood Street Police Station, Grade II* - List entry 1323699
- Salters' Hall, Grade II – list entry 1396374
- remains of the footings of former Church of St Mary the Virgin Love Lane, Grade II - List entry 1359121
- Monument to John Hemminge and Henry Condell, Grade II – List entry 1064772
- 1 Cornhill, Grade II - List entry 1286711
- Bank of England, Grade I – List entry 1079134
- 1-6 Lombard Street, Grade II – List entry 1286139
- 1 King William Street, Grade II – List entry 1252015
- St Mary Woolnoth Church, Grade I – List entry 1064620
- Brewers Hall, Certificate of Immunity – List entry 1439550

51. Whilst there are multiple other heritage assets in the broader locality their relationship with the site gives no rise to harm to their heritage significance.
52. Having regard to their setting and significance the proposals are considered to have a neutral impact upon the identified heritage assets with the exception of the Guildhall.
53. The proposed development would create an appreciable backdrop above the established roofline of the Guildhall in key approaches along King and Queen Street. The spire of this building forms an important architectural and historical interest and appreciation of the significance building. The TVIA / LVMF analysis suggests that building will sit comfortably in its surroundings with the most notable heritage impact being on axial views of the Guildhall spire. While there is no particular concern given the recessive, background nature of the view, full renderings should be provided to ensure that the materiality of the upper levels of the proposal do not impact on the setting of the spire. Given the currently clear backdrop to the spire the proposals represent some small scale, less than substantial harm to the significance of the Guildhall caused through the change to its setting. It is acknowledged that as you progress closer to the Guildhall at a pedestrian level the perception of harm diminishes.
54. The harm identified is small scale and less than substantial nonetheless there should be public benefits which outweigh the scale of the harm identified with regards to the significance of the heritage asset. The proposed improvements in the public realm at both ground floor level at Brewer's hall gardens, London Wall and new through route from London Wall to Basinghall Street and at podium level also between the 40 and 55 Basinghall Street with inclusive public access to the raised walkway and podium public space are a significant public benefit which will further enhance connectivity and legibility including improving access to and appreciation of the Guildhall and surrounding listed buildings. The public benefits associated with the scheme will be weighed against the minor, less than substantial harm to the significance of the Guildhall (only vaguely appreciable in longer held views of the Guildhall on the southern approaches) once the scheme is referred back at Stage II

and the final details (especially those regarding office spaces and affordable workspace) confirmed.

Transport

Transport assessment (TA)

55. The application proposes alteration to areas of City Walkway, an existing elevated pedestrian route connecting various office buildings. These proposed alterations are the subject of a parallel non-referable application for partial demolition, removal and replacement of the City Walkway (local ref: 21/00201/LBC) which will be determined jointly by the City Corporation.
56. Although the walkway alterations proposed are acceptable in principle, the new walkway proposed would be narrower than the current one. The design should therefore be supported by a Pedestrian Comfort Levels (PCLs) assessment following the Pedestrian Comfort Guidance for London.
57. This assessment should cover all new elements of the new walkway, including the lift, and use projected future baseline pedestrian flows in the TA. This is necessary to ensure compliance with London Plan Policy T4 (Assessing and mitigating transport impacts), specifically part E on cumulative impacts.

Wayfinding

58. The City Corporation should secure £35,000 to help deliver Legible London signage on site in line with Policy T4 part C and D5 (Inclusive design) of the London Plan.

Cycling

59. As the proposed development would create a new cycling access directly into the site from London Wall, via the new north-south pedestrian route proposed, the City Corporation should consider how this development can facilitate the widening and full segregation of the cycle lanes between London Wall's Rotunda roundabout junction and the A501 Moorgate / A1211 London Wall junction approximately 250 metres west of the site. This part of London Wall could then be formally designated as part of the London-wide TfL Cycleways network.
60. The route between the site and Quietway 11 should also be assessed prior to determination using the TfL Cycle route quality criteria. This assessment will identify any highway works necessary to link the proposed development to Quietway 11 and enable a new link route along Aldermanbury Square and Love Lane to also become a Cycleway.
61. After the assessment, the TfL Cycleways signage guidance and London Cycling Design Standards (LCDS) should be used to design and cost appropriate signage for London Wall and the new link route to Quietway 11, and any highway works necessary to ensure cyclist safety and comfort along them.
62. Any cycling improvement measures identified should then be funded by the applicant and implemented via S278 in accordance with London Plan Policies T3 (Transport capacity, connectivity and safeguarding) part B, Policy T4 part C and T5 (Cycling) part A of the London Plan.

Cycle Parking

63. The application is largely compliant with Policy T5 and Table 10.2 of the London Plan on minimum cycle parking standards, the amount of short stay cycle parking for the retail uses should be increased to achieve greater London Plan compliance.
64. 611 long stay cycle parking spaces are proposed in the basement of the new 55 Basinghall Street building and three short stay cycle parking spaces at ground floor level for visitors. This includes only four short stay cycle parking spaces for the ground floor retail proposed when the London Plan minimum standard for retail that should be applied requires nine spaces.
65. A total of 206 long stay spaces are proposed at basement level for the refurbished 40 Basinghall Street building, along with 20 spaces also in the basement but proposed for use as short stay cycle parking. Ten long stay cycle parking spaces are proposed for the flexible retail units, located within the units themselves. These amounts exceed London Plan standards for the refurbished floorspace which is welcome.
66. The LCDS recommends that short stay cycle parking should always be located in the public realm. All cycle parking design should comply with the LCDS and at least 5% of all long stay cycle parking should therefore cater to larger and adapted bikes.
67. End of journey facilities to encourage cycling should be provided prior to occupation for all uses to encourage active travel. Showers and lockers must also be provided within the flexible ground floor retail units, which has not yet been demonstrated.
68. Facilities for charging e-bikes and to accommodate cargo bike deliveries are also recommended, in both the servicing areas and adjacent to the main pedestrian entrances.
69. The City Corporation is encouraging planning applicants to produce Cycling Promotion Plans rather than Travel Plans, which is supported due to the unique local travel context. This is welcome in accordance with London Plan policy T4 part B. However the Cycling Promotion Plan should be provided to TfL officers for further comment prior to determination and secured by pre-occupation condition.

Car Parking

70. The development is proposed to be car-free except for one disabled car parking space proposed in the basement of 40 Basinghall Street. This complies with London Plan policy T6.2 (Office parking) which is welcome.
71. A total of 22 car parking spaces and a motorcycle parking area currently in the basement of 40 Basinghall Street are proposed to be removed. The location and accessibility of the single disabled car parking space should be clarified prior to determination.
72. The two new delivery and servicing bays proposed at basement level beneath 55 Basinghall Street should be provided with active Electric Vehicle Charging Points (EVCPs) from the outset in accordance with Policy T6 (Car parking) of the London Plan. This should be secured by condition.

Delivery & Servicing

73. Delivery and servicing areas to serve the development are proposed off-street to reduce road danger, which is supported in line with London Plan policy T4 part F. A framework Delivery and Servicing Plan (DSP) has been provided which is acceptable in principle and a full DSP should be secured by condition in line with p\Policy T7 (Deliveries, servicing and construction) of the London Plan. Facilities for

cargo bikes would also be strongly supported. The City Corporation should consider restricting service vehicle movement during the cycle and pedestrian network peak periods. Use of an off-site freight consolidation centre is also proposed for both sites to minimise highway capacity impacts. This is supported in line with London Plan Policy T7 part E.

Construction

74. The proposals are not currently supported by a Construction Logistics Plan (CLP). This is required in accordance with London Plan Policies T4 and T7. An outline CLP must therefore be produced in accordance with TfL guidance and submitted to support the application prior to determination.
75. Construction logistics planning and traffic management are essential to ensuring Vision Zero, the Mayor's target to eliminate death and serious injury from London's transport networks by 2041.
76. Given the close proximity of Quietway 11, a full Road Safety Audit (RSA) and Designer's Response should be secured for all eventual final construction access proposals.

Sustainable development

Energy strategy

77. The applicant has submitted an energy assessment in accordance with London Plan Policy SI2. However, further information is required to address the following strategic areas:
 - Update required to the refurbished baseline.
 - Further energy efficiency measures should be considered and proposed to the refurbished element.
 - Further information required on the proposed Citigen district heating connection and should also reconsider the potential to utilise cooling. The heat loads connected to the network should be maximised.
 - Further information required on the PV potential.
 - Confirm the carbon offset approach with the borough.
 - Address the Whole Life-cycle Carbon and Be Seen policies.
78. This information is required before the expected carbon dioxide reductions and overall savings can be confirmed. Full details of the outstanding issues associated with energy have been provided directly to the applicant and Corporation.

Circular Economy

79. The promotion of a more circular economy that achieves improved resource efficiency and innovation in order to maintain products and materials at their highest use for as long as possible is one of the objectives of Policy SI7 of the London Plan. London Plan SI7 requires development applications that are referable to the Mayor of London submit a Circular Economy Statement, in addition London Plan policy D3 requires development proposals to integrate circular economy principles as part of the design process, therefore the applicant should submit a circular economy statement.

Whole Life Carbon Cycle

80. In accordance with London Plan Policy SI12 the applicant is required to submit a calculation and measures to reduce whole life-cycle carbon emissions to fully capture the development's carbon footprint.
81. Whilst the energy assessment and sustainability statement document demonstrates that WLC has been taken into account and that a WLC assessment has been completed, all applicants are expected to submit a completed WLC assessment template (as an Excel document, not a PDF) and follow the GLA WLC guidance; both of which are available here: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/whole-life-cycle-carbon-assessments-guidance-consultation-draft>
82. The applicant should submit a WLC assessment template in full. This is important to allow results to be recorded and tracked through to the post-construction stages, and to allow a proper review of the results against material quantities and other assumptions made. As per the GLA 'Whole Life-cycle Carbon Assessment – draft for consultation – guidance document' this assessment should comply with EN 15978 and cover all building elements.
83. Two assessments are required to be submitted through the GLA WLC template – one that does not account for decarbonisation of the grid (Assessment 1) and another that does account for decarbonisation to both operational and embodied carbon (Assessment 2). Carbon emissions during lifecycle modules A1-A5 and B1 of Assessment 2 should not include the decarbonised figures. Reference should be made to the GLA WLC guidance documents and RICS PS for more details.

Urban greening

84. 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.
85. The applicant has submitted the scheme's UGF (page 235 of the DAS). The calculation table shows a UGF of 0.3 (compliant with the target for commercial development set by Policy G5 of the London Plan); however, the supporting text explains that this is not based on the total site area. Instead, areas of the site where urban greening is not considered to be feasible have been removed. When the total site area is used to calculate the UGF the scheme achieves a score of 0.24.
86. As set out in Policy G5, and in the supporting guidance (available: <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/urban-greening-factor-ugf-guidance-pre-consultation-draft>) the calculation should be based on the total site area. The scheme's UGF is therefore 0.24. Acknowledging that there may be site constraints, the applicant should review the urban greening proposed, seeking to improve the quality or quantity, to increase the application's UGF. Features for consideration may include: expanding the area of the proposed green roof, including a green wall across sections of the building façade, introduce further planting at the ground level or expansion of greening on the proposed terraces.
87. The review should be submitted, with a re-calculated UGF and supporting text explaining the improvements considered. Should the scheme be short of the target following the review, robust justification should be submitted.

Biodiversity

88. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain.
89. It is recommended the applicant should provide evidence the proposed development secures a net biodiversity gain in accordance with Policy G6(D) of the London Plan.

Sustainable drainage, flood risk and water efficiency

90. The London Plan Policy SI12 and SI13 seek to mitigate flood risk. The site is in Flood Zone 1 and a critical drainage area. Flood Risk Assessment (FRA) provided for the proposed development generally complies with the London Plan Policy SI.12, however, indicative groundwater levels should be provided to confirm the level of risk at the site.
91. The surface water drainage strategy for the proposed development does not comply with London Plan Policy SI.13, as it does not give appropriate regard to Sustainable Drainage Systems (SuDS). Further commitment to provide green roofs, rainwater harvesting, rain gardens, and permeable paving needs to be provided. A drainage strategy plan needs to be provided which should show all the proposed SuDS measures. More detailed attenuation calculations need to be provided to confirm the required attenuation volume. Finally, an assessment of exceedance flood flow routes above the 100 year event plus 40% climate change needs to be provided.
92. The proposed development generally meets the requirements of London Plan Policy SI.5 which seeks to limit water consumption. The Applicant should also consider water harvesting and reuse to reduce consumption of water across the site. This can be integrated with the surface water drainage system to provide a dual benefit.

Air quality

93. London Plan Policy SI1 requires major applications to be accompanied by an air quality assessment, which demonstrates how the development would not lead to further deterioration of existing poor air quality, create any new areas that exceed air quality limits (or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits) or create unacceptable risk of high levels of exposure to poor air quality. The application is supported by a Health Impact assessment which suggests an air quality assessment has been undertaken however does not appear to be available for review. The LPA must ensure through appropriate conditions that the development would be air quality neutral and not create unacceptable risk of exposure to poor air quality. Impacts from construction dust effects should be mitigated against also.

Local planning authority's position

94. City of London Corporation planning officers are currently assessing the application.

Legal considerations

95. 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. In this case, the Corporation need not refer the application back to the Mayor if it resolves to refuse permission. 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

96. There are no financial considerations at this stage.

Conclusion

97. London Plan policies on offices, retail, central activity zones, affordable workspace, urban design, London view management framework, heritage, 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:

- **Land use principles:** The proposed intensification of the site for office led development with retail functions at lower floors is considered consistent with the CAZ and acceptable in principle subject to further consideration of flexible and affordable workspace. (paras. 18-25)
- **Urban Design/LVMF:** The overall design approach is complementary to local context and is acceptable subject to some clarification on the materiality on the upper floors of the proposed 2 Aldermanbury Square building. The public realm is much improved and there is negligible impact to the protected views of Westminster Pier to St Paul. (paras. 26 - 46)
- **Heritage:** There is some small scale, less than substantial harm identified to the Guildhall, however on balance the public benefits of the scheme with the much enhanced public realm and local pedestrian connectivity could be considered to outweigh the less than substantial harm identified to the significance of the Grade I listed Guildhall. This harm could be further diminished by confirmation of a more neutral colour pallet to backdrop of the Guildhall spire. GLA officers will conclude the balancing exercise once the final package of public benefits is confirmed at Stage II (paras. 47 - 54)
- **Transport:** the proposed development broadly complies with the London plan subject to clarification over cycle parking/facilities, a pedestrian comfort level assessment, contributions towards wayfinding and strategic cycle network and provision of construction logistics plan and road safety audit (paras. 55 - 76)
- **Sustainable Development:** Further information is required to ensure the development is consistent with the objectives of the London Plan with regards to Energy, Whole Life Carbon Cycle, Circular Economy/Waste, Urban Greening, Biodiversity, Drainage and Air Quality. (paras. 77 - 93)

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

Patrick Doyle, Senior Strategic Planner (case officer)

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Comments for Planning Application 21/00116/FULMAJ

Application Summary

Application Number: 21/00116/FULMAJ

Address: City Tower And City Place House 40 - 55 Basinghall Street London EC2V

Proposal: Demolition of the existing building at 55 Basinghall Street (known as City Place House) and the erection of a Class E building for commercial, business and service use with Class E retail use at ground floor level with works to include partial removal, re-alignment and reinstatement of the Bassishaw Highwalk*; partial demolition, reconfiguration and refurbishment of the basement, lower ground, ground and mezzanine floors of 40 Basinghall Street (known as City Tower) for Class E commercial, business and service and retail use works to include the provision of a new lift and staircase between street and Highwalk level and reconfiguration and re landscaping of the existing first floor terrace area; formation of a new pedestrian route between London Wall and Basinghall Street; hard and soft landscaping works including alterations to and within the public highway; other works incidental to the proposed development (49,119 sq.m). |cr|*This application involves the rescission and alteration of areas of City Walkway through City Place House and City Tower, and rescission and alterations of the city walkway and walkway bridge over Basinghall Street.

Case Officer: Gemma Delves

Customer Details

Name: Ms anita strymowicz

Address: 509 Mountjoy House barbican london

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The proposed building is due to be higher than the existing one by quite a few floors! This is purely driven by financial greed. What about the people that live here? What about our right to fresh air, being able to see blue sky, the light?

Why would we benefit from another tall building that will also give off light in the night which affects our sleep and the causes the birds to sing throughout the night rather than to sleep?

The only person that would benefit from this is the greedy landowner and the corporation - they benefit financially. We don't need more office space, taller buildings, we need more light, more air, more view. We need a better quality of life. You will be taking this from us and creating another planning precedent.

For once, you need to stop and think about quality of life of those that live here. Especially after a year of pandemic. It's the right and moral thing to do.

Do NOT build higher than what is originally here - there is NO need for it, just the landowners' financial greed benefits. No-one else.

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Case Officer: Gemma Delves

Customer Details

Name: Mr Charles-Etienne Lawrence

Address: Flat 53, Andrewes House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:I object to this development which will further reduce the amount of sunlight/daylight and visible sky for residents, in particular at Andrewes House.

It is not appropriate to consider the impact of this development in isolation as residents suffer from incremental erosion of the daylight/sunlight they benefit from with each successive development being allowed by the City. Consider the detrimental impact that the London Wall Place (1&2) development has had on residents the City should limit the height of new developments/redevelopments so as not to further erode the visibility of the skyline and the light residents benefit from.

If the City is serious with its plan to increase the residential population it should also be serious about preserving the quality of the stock it currently has instead of allowing office developers to

blight our living environment.

Furthermore, the height of the proposed building is not in keeping with many of the neighbouring buildings, including the Guildhall.

There are positive aspects to the proposals such as the activation of ground level with retail and making the London Wall elevation/frontage more active.

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Case Officer: Gemma Delves

Customer Details

Name: Mr Hamish Pollock Fraser

Address: Flat 23 Cromwell Tower Barbican

Comment Details

Commenter Type: Member of the Public

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The proposed building expands on the footprint of the existing site in a way that is insensitive to neighbouring buildings, especially residents in the Barbican.

The building height has increased to 69metres from 65 (the existing spire) and 58m for the main body of the existing building. The proposed building's presence will reduce light to the residents, block views of the sky and over towards the shard and contribute to a claustrophobic streetscape in the city. I would urge CoL to ask the proposed building to fit within the existing volume of the existing building.

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Case Officer: Gemma Delves

Customer Details

Name: Ms L Goldberg

Address: FLAT 129, ANDREWES HOUSE BARBICAN London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

Comment:I note in your planning documentation that there is a due consideration for loss of light with regards to the Barbican neighbours living directly opposite the proposed new building (with its addition of 5 floors) However, I could not find any consideration for 'loss of sky' to a broader range of residents, as a result of the carving out of the real estate in the sky in the addition of these 5 floors.

Barbican residents have been subjected to a relentless reduction of their access to the sky (a shared natural resource) through the many recent developments adjacent to the complex, having the effect of increased claustrophobic living.

I would urge the City to reconsider its approval of the addition of 5 floors, with yet another debilitating encroachment on the sky in the immediate vicinity of its City residential domiciles in the Barbican Estate. The integrity of the Estate lies not just in its structures but in the breathable

spaces in and around it, designed in part to maintain the delicate balance between residential and business needs.

Sadly, it would appear the City no longer cares to maintain this post-war vision. Instead, we see a focus on building out every possible square inch of the City Mile, both vertically and horizontally.

On a separate note, it would have been helpful to those wanting to make comments to include a major change, such as the addition of the 5 floors to the summary description, not just the features which would be considered advantageous to both residents and businesses.

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Case Officer: Gemma Delves

Customer Details

Name: Mr Nigel Pilkington

Address: 59 Andrewes House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:I write to object to the height of the proposed development, which seeks to demolish City Place House, and replace it with an office block which is 5 floors higher.

Being directly south of my flat, I rely on the direct sunlight not only to light my flat, but to heat it in winter (as the heating system and lack of insulation particular to the Barbican Estate's top-floor flats means any heat provided soon leaves through the roof).

The City deems it acceptable if 20% of a flat's sunlight is impinged by a new development.

Accordingly, this new development has strategically maxed out its light reduction to the highest allowed level....20%.

Aside from the loss of light in winter months, is it acceptable that yet another development raises

its height, adding to the problem of boxing in the listed Barbican Estate. At what point will the City accept that it must stop allowing taller and taller buildings around the entire perimeter of the Estate?

If the proposed development were to match the current height of City Place House, then I would be happy to withdraw my objection.

Yours faithfully
Nigel Pilkington

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Case Officer: Gemma Delves

Customer Details

Name: Mr James Durcan

Address: Flat 48 Andrewes House, Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment:As Chair of the Andrewes House Residents' Group I am writing to express residents' opinion on the proposed demolition and re-development at 40-55 Basinghall Street. At a recent meeting residents expressed their opposition to the proposed increase in the height of the building as this would restrict their access to daylight and to sunshine. Increasing the height of the building by five floors is a very substantial change and will have a very substantial and negative impact of Andrewes House residents. Residents would prefer that the building is no higher than the current structure.

Other parts of the proposed scheme were welcomed. The proposal to create a pedestrian access to Basinghall Street by re-configuring City Tower was welcomed.

There was serious disappointment that the proposed scheme would remove - albeit for a limited period - the highwalk over London Wall and the access the Guildhall North Wing. Would it be possible to lay down a planning condition that every effort should be made to minimize the length

of time that the highwalk will - again - be unavailable to residents. The proposal to improve access from the highwalk to street level via a new lift was welcomed.

Concern was expressed that a building that was only 25 - 30 years old was to be demolished and rebuilt with all the pollution associated with the demolition and construction and the substantial increase in carbon emissions during this process. Can the Planning Committee not insist that buildings should have substantially longer life spans as part of its Climate Action Strategy.

Residents also hoped that planning conditions would require full implementation of the recommendations of the ecological survey and ensure that the buildings complied with or exceeded the requirements for a greener, cleaner more bio-diverse City.

From: [Delves, Gemma](#)
To: [DBE - PLN Support](#)
Subject: FW: City Tower & City Place House 40 - 55 Basinghall Street EC2V
Date: 27 May 2021 20:48:32

Please can the objection below be registered against application 21/00116/FULMAJ.

Thank you

Gemma

From: Littlechild JP, Vivienne [REDACTED]
Sent: Sunday, May 9, 2021 12:06 pm
To: Richards, Gwyn
Subject: City Tower & City Place House 40 - 55 Basinghall Street EC2V

Dear Mr. Richards,

I am writing to oppose the above for its application to increase the height of the building with 5 additional floors.

I attended the online discussion with the developers who admitted that their proposal will increase the loss of light that we have suffered in Andrewes House, Barbican. The developer has shown scant interest in the residents of the Barbican and Andrewes House in particular with this proposal. I do not oppose the redevelopment within its current footprint, but 5 Aldermanbury has made our winter afternoons dark, London Wall Place has caused additional loss of light to a large section of AH and the tower to Wallside. We are now completely boxed in and although our "views" are not a planning consideration, but time and again decisions are taken that only suit the developer. We have been living with constant development at this end of the estate for what will be at least 10 years once the Moorfields structure is complete.

This proposal is too tall - please limit the height of the proposal to its current level. Their claim that the lower levels, with some sort of commercial space is not an asset as they claim. It is off the beaten track and the additional height only gives great benefit to the developer. The damage to residents will be yet more loss.

Vivienne Littlechild MBE JP CC

Chair, Guildhall School of Music & Drama

Chair, Sculpture in the City

Elected Member for the Ward of Cripplegate

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Comments for Planning Application 21/00116/FULMAJ

Application Summary

Application Number: 21/00116/FULMAJ

Address: City Tower And City Place House 40 - 55 Basinghall Street London EC2V

Proposal: Demolition of the existing building at 55 Basinghall Street (known as City Place House) and the erection of a Class E building for commercial, business and service use with Class E retail use at ground floor level with works to include partial removal, re-alignment and reinstatement of the Bassishaw Highwalk*; partial demolition, reconfiguration and refurbishment of the basement, lower ground, ground and mezzanine floors of 40 Basinghall Street (known as City Tower) for Class E commercial, business and service and retail use works to include the provision of a new lift and staircase between street and Highwalk level and reconfiguration and re landscaping of the existing first floor terrace area; formation of a new pedestrian route between London Wall and Basinghall Street; hard and soft landscaping works including alterations to and within the public highway; other works incidental to the proposed development (49,119 sq.m). |cr|*This application involves the rescission and alteration of areas of City Walkway through City Place House and City Tower, and rescission and alterations of the city walkway and walkway bridge over Basinghall Street.

Case Officer: Gemma Delves

Customer Details

Name: Mr Andrew Hope

Address: Flat 107 Breton House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity
- Traffic or Highways

Comment:I object to the development based on:

Residential amenity - it is unreasonable to increase the height of this building. It will cause loss of light to the surrounding streets and negatively impact Barbican residents.

Highways - closure of the highwalk for four years is excessive and will make it much more inconvenient for residents to cross from the Barbican estate to the south of London wall.

Environmental grounds - the demolition of a building that is only 25 to 30 years old is clearly not going to help achieve the various environmental targets the City is supposed to be pursuing.

Comments for Planning Application 21/00116/FULMAJ

Application Summary

Application Number: 21/00116/FULMAJ

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Case Officer: Gemma Delves

Customer Details

Name: Mr Gareth Owen

Address: 19 Andrewes House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Residential Amenity

Comment: We object to the height of the building as it will significantly limit the amount of daylight in Andrewes House and neighbouring blocks.

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Fwd: 21/00116/FULMAJ comments
Date: 12 May 2021 16:39:40

Dear Sir/Madam

21/00116/FULMAJ

"The proposal has an adverse and unacceptable impact on many residential properties north of London Wall:

a) the decision to exaggerate the height of the walls surrounding the northwest plant room was taken on purely formalistic grounds (DAS 4.3) and without regard to how greatly this would reduce daylight and sunlight in affected flats;

b) the VSC and APSH calculations do not take account of oversailing fixed balconies / fire-escapes in Grade II listed Barbican residences nearby, and in doing so they under-represent the real effect on residents caused by the over-tall north elevation (Anstey Horne 4.10, 4.11);

iii) the impact of the design on residential properties has not been treated as a priority (evident from DAS 3.3 fig 22; mention of the Barbican is absent from DP9's Planning Statement). The resulting north elevation is an oppressively high slab, blocking light and sky, and canyonising London Wall;

iv) during the consultation exercise, factual information about the proposal's height was lacking, inaccurate figures and approximate responses were given on request, and no long sections by which residents could assess the proposal's relationship with their homes were supplied (not reported in Concilio 4.7, reported in DAS 3.4.1);

v) long sections are still absent from the planning submission, and the building sections supplied are taken through the lowest parts of the building - this, together with misleading information about VSC and APSH, makes proper judgment about the proposal impossible.

The following measures would, I suggest, resolve the damaging aspects of an otherwise outstanding scheme, and might remove the accusation that it puts profits before people:

a) step the top 2 or 3 floors back from the building line along the north elevation to reduce its oppressive effect;

b) reduce the height of the northwest plant room enclosure."

David Bass
13 Andrewes House, Barbican, London EC2Y 8AX

Comments for Planning Application 21/00116/FULMAJ

Application Summary

Application Number: 21/00116/FULMAJ

Address: City Tower And City Place House 40 - 55 Basinghall Street London EC2V

Proposal: Demolition of the existing building at 55 Basinghall Street (known as City Place House) and the erection of a Class E building for commercial, business and service use with Class E retail use at ground floor level with works to include partial removal, re-alignment and reinstatement of the Bassishaw Highwalk*; partial demolition, reconfiguration and refurbishment of the basement, lower ground, ground and mezzanine floors of 40 Basinghall Street (known as City Tower) for Class E commercial, business and service and retail use works to include the provision of a new lift and staircase between street and Highwalk level and reconfiguration and re landscaping of the existing first floor terrace area; formation of a new pedestrian route between London Wall and Basinghall Street; hard and soft landscaping works including alterations to and within the public highway; other works incidental to the proposed development (49,119 sq.m). |cr|*This application involves the rescission and alteration of areas of City Walkway through City Place House and City Tower, and rescission and alterations of the city walkway and walkway bridge over Basinghall Street.

Case Officer: Gemma Delves

Customer Details

Name: Mr David Menkin

Address: 161 Andrewes House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:I object to the 5 floor increase, as the loss of light will be substantial to someone like me, who lives on the 4th floor of Andrewes House. A 20% loss seems like a conservative estimate.

Comments for Planning Application 21/00116/FULMAJ

Application Summary

Application Number: 21/00116/FULMAJ

Address: City Tower And City Place House 40 - 55 Basinghall Street London EC2V

Proposal: Demolition of the existing building at 55 Basinghall Street (known as City Place House) and the erection of a Class E building for commercial, business and service use with Class E retail use at ground floor level with works to include partial removal, re-alignment and reinstatement of the Bassishaw Highwalk*; partial demolition, reconfiguration and refurbishment of the basement, lower ground, ground and mezzanine floors of 40 Basinghall Street (known as City Tower) for Class E commercial, business and service and retail use works to include the provision of a new lift and staircase between street and Highwalk level and reconfiguration and re landscaping of the existing first floor terrace area; formation of a new pedestrian route between London Wall and Basinghall Street; hard and soft landscaping works including alterations to and within the public highway; other works incidental to the proposed development (49,119 sq.m). |cr|*This application involves the rescission and alteration of areas of City Walkway through City Place House and City Tower, and rescission and alterations of the city walkway and walkway bridge over Basinghall Street.

Case Officer: Gemma Delves

Customer Details

Name: Dr Dimitri Varsamis

Address: Apartment 83, Roman House, Wood Street, London EC2Y 5AG

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment:Myself, and the residents of another 45 apartments of Roman House that face London Wall and the building in question, will have a significant amount of direct sunlight for part of the year stolen from us, due to the significantly taller building that will replace the current.

I appreciate a report claims that we will not lose significant light and sun, but when I look out of the window, the majority of the sky that I see is near exclusively above the building in question, now that London Wall Place 2 is there. So alongside sun and light, you should consider the impact on sky real estate.

We will also lose view of the Shard, which we can currently see, and has offered us joy in its lighting show to mark the seasons and in particular Christmas and New Year.

Finally, 3 years worth of demolishing and construction for yet another office block with an estimate life of 20-odd years is not good for the environment, or the health of the local residents.

PS. the design of the building is awful.

Begum, Shupi

From: Jane Smith [REDACTED]
Sent: 18 May 2021 10:18
To: PLN - Comments
Cc: [REDACTED] Jane Smith
Subject: Objection to 21/00116/FULMAJ

The City Planning Officer
Department of Planning and Transportation
City of London
PO Box 270,
Guildhall
London EC2P 2EJ

17th May 2021

For the attention of Ms Gemma Delves, Planning Officer

Dear Ms Delves,

Objection to application 21/00116/FULMAJ: 55 Basinghall Street (known as City Place House)

- We are writing on behalf of the Barbican Association, representing residents of the Barbican Estate, to **object** to the above application relating to the site at 55 Basinghall Street on the grounds of loss of residential amenity. Given the City of London's Climate Action Strategy, we would also like to express our concern that such a relatively new building is to be demolished and another significantly larger one put up in its place. Inevitably the demolition and construction process will create high levels of pollution and give rise to a substantial increase in carbon emissions during this process.

Unwarranted increase in height and mass

We are aware that the new building is planned to be 4 storeys higher than the existing structure. It is disappointing to note however that the consultation process failed to supply residents with precise information about the proposed increase in height, with approximations of 10m-11m given by the developers.

However, this conflicts markedly with the Statement of Community Involvement which, in answer to the question "How have you been able to double the existing size?", gives the answer "The existing building has high floor ceiling level which we have reduced and we will also be going **30m taller** with a slight increase in the width". Residents were already concerned about an increase of 10-11m, as told to them, but an increase of 30 metres will definitely adversely impact the levels of light and skyline available to residents in the near vicinity. We are also dismayed that we were misled.

We have previously voiced our concerns about the steady escalation in building height around the Barbican which is creating a "canyonisation" of this Grade II and II* listed Estate. At the South and East side of the Estate this is clearly evidenced by the recent developments at London Wall Place, 21 Moorfields, Tenter House and Moorgate Exchange and this proposed redevelopment of the City Place House site will merely perpetuate this trend.

The Statement of Community Involvement goes on to state that "The existing building is 175,000 sq ft which can accommodate 1,750 workers. The proposals will increase the building size to 320,000 sq ft and also incorporates more intensive and efficient servicing which will put the maximum number of workers at 4,000". That means an increase in building size of a massive 83%, able to accommodate a more than doubling of worker numbers.

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Loss of Daylight/Sunlight

In our opinion, the proposed increase in the height and bulk of the building is unwarranted and will lead to a significant diminution of residential amenity contrary to Policies DE8 and HS3 of the Draft Local Plan 2036. Whilst the Daylight & Sunlight Report states, as such reports always do, that the development will have little or no adverse impact on daylight and sunlight levels on neighbouring properties, we disagree. The proposed increase in height will inevitably cause loss of daylight and sunlight levels in many neighbouring properties – particularly those in Andrewes House, Willoughby House and Roman House. It also appears clear that the applicant has not taken the cumulative impact of individual developments on the amenity of existing residents into consideration as required by the Draft Local Plan 2036 Policy H3.

The VSC and APSH calculations provided by the applicants do not take account of the fixed balconies, thereby under-representing the true effect on residents caused by the much taller North elevation. How can balconies on part of a Grade II listed building, which was completed in May 1974 and in a conservation area, be at fault for the loss of light caused by the proposed increase in height of the proposed building? The decision by the applicant to exaggerate the height of the walls surrounding the northwest plant room appears to have been taken without proper regard to how greatly this would reduce the levels of daylight and sunlight received in affected flats.

Summary

In summary, whilst we do not disagree with the concept of the development of the site per se, it is the inappropriate height and mass of the current design and its unacceptable impact on residential amenity which we object to. We would therefore request that this application be rejected in its current form and that the height of the proposed development be maintained at its present level. A simple solution to achieve this would be to step back the top 3 floors on the North elevation to reduce its dominating effect and to reduce the height of the Northwest plant enclosure room. This marginal scaling back in a scheme that is applying for an 80%+ increase in mass would surely be relatively insignificant in terms of loss of space for the developers but a very significant improvement indeed for nearby residents.

We would also like to request that the Highwalk between London Wall and the Guildhall be accessible for as long a period as possible while the works are carried out.

Yours sincerely,

Jane Smith Chair, Barbican Association Planning & Licensing Sub-Committee
c/o 307 Seddon House, Barbican, EC2Y 8BX

Comments for Planning Application 21/00116/FULMAJ

Application Summary

Application Number: 21/00116/FULMAJ

Address: City Tower And City Place House 40 - 55 Basinghall Street London EC2V

Proposal: Demolition of the existing building at 55 Basinghall Street (known as City Place House) and the erection of a Class E building for commercial, business and service use with Class E retail use at ground floor level with works to include partial removal, re-alignment and reinstatement of the Bassishaw Highwalk*; partial demolition, reconfiguration and refurbishment of the basement, lower ground, ground and mezzanine floors of 40 Basinghall Street (known as City Tower) for Class E commercial, business and service and retail use works to include the provision of a new lift and staircase between street and Highwalk level and reconfiguration and re landscaping of the existing first floor terrace area; formation of a new pedestrian route between London Wall and Basinghall Street; hard and soft landscaping works including alterations to and within the public highway; other works incidental to the proposed development (49,119 sq.m). |cr|*This application involves the rescission and alteration of areas of City Walkway through City Place House and City Tower, and rescission and alterations of the city walkway and walkway bridge over Basinghall Street.

Case Officer: Gemma Delves

Customer Details

Name: Mr Chris Young

Address: Flat 127 Andrewes House London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other
- Residential Amenity

Comment:I am opposed to the proposed increase in the height of the building as this would restrict our access to daylight and to sunshine.

Increasing the height of the building by five floors is a substantial change and will have a significant negative impact on Andrewes House residents.

On the other hand, the proposal to create a pedestrian access to Basinghall Street by re-configuring City Tower is welcomed.

I would be disappointed that the proposed scheme would remove - albeit for a limited period - the highwalk over London Wall and the access the Guildhall North Wing.

I am concerned that a building that is only 25 - 30 years old is to be demolished and rebuilt with all the pollution associated with the demolition and construction and the substantial increase in carbon emissions during this process.

Overall, I strongly opposed due the adverse impact the new height will have on neighbours, many being residents.

Comments for Planning Application 21/00116/FULMAJ

Application Summary

Application Number: 21/00116/FULMAJ

Address: City Tower And City Place House 40 - 55 Basinghall Street London EC2V

Proposal: Demolition of the existing building at 55 Basinghall Street (known as City Place House) and the erection of a Class E building for commercial, business and service use with Class E retail use at ground floor level with works to include partial removal, re-alignment and reinstatement of the Bassishaw Highwalk*; partial demolition, reconfiguration and refurbishment of the basement, lower ground, ground and mezzanine floors of 40 Basinghall Street (known as City Tower) for Class E commercial, business and service and retail use works to include the provision of a new lift and staircase between street and Highwalk level and reconfiguration and re landscaping of the existing first floor terrace area; formation of a new pedestrian route between London Wall and Basinghall Street; hard and soft landscaping works including alterations to and within the public highway; other works incidental to the proposed development (49,119 sq.m). |cr|*This application involves the rescission and alteration of areas of City Walkway through City Place House and City Tower, and rescission and alterations of the city walkway and walkway bridge over Basinghall Street.

Case Officer: Gemma Delves

Customer Details

Name: Mr Olivier N

Address: Mountjoy house London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The new project will greatly reduced the daylight for residents and is another example of the Barbican being walled in, but mostly empty office like 200 aldersgate st

Comments for Planning Application 21/00201/LBC

Application Summary

Application Number: 21/00201/LBC

Address: 65 - 65A Basinghall Street London EC2V 5DZ

Proposal: Partial demolition of and associated works to 65/65a Basinghall Street to allow for the removal of the existing City Walkway bridge and installation of new City Walkway bridge to be delivered as part of the redevelopment of 55 Basinghall/40 Basinghall Street (associated reference 21/00116/FULMAJ).

Case Officer: Gemma Delves

Customer Details

Name: Mr Roger Hepher

Address: 105 Andrewes House, Barbican London

Comment Details

Commenter Type: Member of the Public

Stance: Customer made comments neither objecting to or supporting the Planning Application

Comment Reasons:

- Residential Amenity

Comment: I do not object to the replacement of this section of elevated walkway, but it is important that the amount of time between the closure of the existing walkway and the opening of the new one is minimised, and that the Corporation secures step in rights and funding by way of bond to enable it to secure the completion/opening of the new walkway in the event of the developer commencing but not completing the redevelopment scheme.

Comments for Planning Application 21/00116/FULMAJ

Application Summary

Application Number: 21/00116/FULMAJ

Address: City Tower And City Place House 40 - 55 Basinghall Street London EC2V

Proposal: Demolition of the existing building at 55 Basinghall Street (known as City Place House) and the erection of a thirteen storey Class E building for commercial, business and service use with Class E retail use at ground floor level with works to include partial removal, re-alignment and reinstatement of the Bassishaw Highwalk*; partial demolition, reconfiguration and refurbishment of the basement, lower ground, ground and mezzanine floors of 40 Basinghall Street (known as City Tower) for Class E commercial, business and service and retail use works to include the provision of a new lift and staircase between street and Highwalk level and reconfiguration and re landscaping of the existing first floor terrace area; formation of a new pedestrian route between London Wall and Basinghall Street; hard and soft landscaping works including alterations to and within the public highway; other works incidental to the proposed development (49,119 sq.m).

[cr]*This application involves the rescission and alteration of areas of City Walkway through City Place House and City Tower, and rescission and alterations of the city walkway and walkway bridge over Basinghall Street.[cr][cr]RE CONSULTATION: Revised drawings received (revisions to cycle parking and City Tower podium mezzanine) in addition to a Design and Access Statement addendum, further circular economy details, an Air Quality Assessment, additional public realm details, Equalities Statement, Cultural Statement, daylight and sunlight window maps and further detail on highway matters.

Case Officer: Gemma Delves

Customer Details

Name: Mr David Bass

Address: 13 Andrewes House Barbican London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The revised documents and addenda submitted in support of this application do not in any way remove or even improve the adverse and unacceptable impact it has on many residential properties north of London Wall (please refer to my objection of 12 May 2021):

a) no alteration has been made to the unnecessarily exaggerated height of the walls surrounding the northwest plant room (DAS 4.3), which will greatly reduce daylight and sunlight in nearby flats;

b) Vertical Sky Component and Annual Probable Sunlight Hours calculations have not been re-

done to take account of the oversailing fixed balconies / fire-escapes in Grade II listed Barbican residences nearby; the calculations supplied are still misleading, do not reflect the reality of the situation, and do not show the real harm that the North elevation inflicts on residents (Anstey Horne 4.1, 4.11);

iii) no reduction or alteration has been made to the height of the greedily oversized north elevation which blocks light and sky for many residents. While DAS addendum 1 devotes 8 pages to reconsidering the colour of the facade petals to add "strenght (sic) to the identity of the building" while providing a neutral backdrop to distant views of the Guildhall, no thought has been given to the effect of this giant slab on people actually living nearby;

iv & v) no long sections have been made to show the proposal's oppressive relationship with the residential context, and no new "unfavourable" sections through taller parts of the building have been made. These shortcomings in the submission, together with idealised VSC and APSH calculations, make fair and proper judgment about the proposal impossible.

It is a great shame that an otherwise intelligent scheme is blighted by a lack of consideration for the people who would have to live in its very long shadow. None of the amendments recently made to the submission address this fundamental flaw. For this reason, I still object to this proposal.