Committee:	**Date:**
Planning and Transportation	7 September 2021
Subject: 100 And 108 Fetter Lane London EC4A 1ES Demolition of 100 Fetter Lane and construction of a new building for office use (Class E) and a flexible commercial unit (Class E(a)(b)(c)(d)), comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works. [For the avoidance of doubt this application relates to 'Option B' as set out in the application documents. A separate application for 'Option A' is under consideration and is the subject of separate consultation and assessment].	**Public**
Ward: Farringdon Without	**For Decision**
Registered No: 21/00534/FULMAJ	**Registered on:** 21 June 2021
Conservation Area:	**Listed Building:** NO

Summary

The Applicant has submitted two applications with two options for the existing White Swan Public House at 108 Fetter Lane which is occupied by a third party.

Option A (21/00454/FULMAJ): Proposes to demolish this property alongside 100 Fetter Lane to enable the full redevelopment of the Site and to provide a new replacement public house in the north eastern corner of the Site.

Option B (21/00534/FULMAJ): In the event that the Applicant is unable to

incorporate 108 Fetter Lane into the redevelopment, this separate application proposes to retain the existing White Swan pub and to build around it. Option B will not provide a new public house given the existing pub will be retained, and instead will provide a flexible commercial unit (Class E(a)(b)(c)(d) in the north eastern corner of the Site where the Option A new public house would otherwise be sited.

The proposed development includes Demolition of 100 Fetter Lane and construction of a new building for office use (Class E) comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works.

The scheme delivers a high quality, office-led development that would provide a minimum of 12,731 sq.m (GIA) of new flexible office floorspace (Class E) across Level 1 to level 11, which would meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses. The scheme makes optimal use of the site and provides an uplift of approx. 6,731 sq.m (GIA) of office floorspace. The development has been designed to accommodate new ways of working reflected in flexible and adaptable floorspace to meet the demands of different types of business occupiers, including small and medium sized companies which supports post-covid recovery as identified in the 'London Recharged: Our Vision for London in 2025 report. The proposal would also incorporate two ground level retail units that would enable a range of retail/restaurant/cafe uses to come forward (245 sq.m (GIA), providing active frontages to the Bream's Buildings and Fetter Lane elevations, and would help enliven the new public realm between the Site and St. Dunstan's burial ground.

The proposed building would result in a significant aesthetic enhancement to the Fetter Lane locality, through skilful modelling of the elevations, well-considered massing and the use of high-quality, innovative materials. The proposed development would be an appropriate and sympathetic neighbour not only to the buildings immediately adjacent but also to the wider streetscape.

The proposed development has the potential to impact three Assessment Points: Protected Vista 5A.2 (Greenwich Park) and River Prospects 16B.1 and 16B.2 (Gabriel's Wharf).

The proposed development is located within the Background Wider Setting Consultation Area of LVMF Vista 5A.2 from Greenwich Park: the General

Wolfe statue to St Paul's Cathedral. However, the proposed development would be entirely obscured in the view by the existing buildings immediately to the east: No. 12 New Fetter Lane and No. 6 New Street Square, the latter of which is significantly taller than the proposed development.

The proposed development would be visible towards the westerly edge of this River Prospects 16B.1 and 16B.2 (Gabriel's Wharf). Although the proposed development would be visible in this view, it would be situated at such a distance from the Cathedral that it is considered that it would preserve its townscape setting. Additionally, the proposed development would preserve the viewer's ability to read the riverside landmarks in the view.

The magnitude of change in these is considered negligible and the proposed development would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LMVF SPG.

The scheme would deliver significant public realm enhancements including a new pedestrian route linking Mac's Place with Breams Buildings to the south, widening of Greystoke Place and a new publicly accessible pocket park adjacent to St Dunstan's burial ground.

A total of 204 long stay and 28 short stay cycle parking spaces would be provided at ground floor level, accessed from Mac's Place, along with associated cycling facilities including lockers and showers. Access for cyclists would be via two prominent cycle parking entrances at ground level off Mac's Place, or via a dedicated entrance off Fetter Lane. The provision of both long stay and short stay cycle spaces would exceed the requirements of the London Plan.

The proposed short stay cycle parking would be provided entirely within the site boundary at ground floor level. Eight spaces would be located within the new public realm (private land) adjoining the northern end of Mac's Place. One stand would be located on Greystoke Place (on private land) which will provide space for two cycles. The remaining 18 spaces would be provided within a new publicly accessible cycle store. This would be located adjoining the new pocket park and visible from Breams Buildings and the new route through the site.

In order to improve the pedestrian priority of the surrounding area a section

278 agreement will been secured which would deliver improvements to pedestrian crossing facilities at the junction of Bream's Buildings, Fetter Lane and New Fetter Lane to better facilitate east/west pedestrian movement, works to tie the new building line and new route into the public highway on Mac's Place, public highway lighting improvements, footway surrounding the site to be replaced with York stone, and any cycle improvements necessary to allow access to the cycle parking.

The servicing of the building would take place on-street on Fetter Lane, which would be contrary to policy DM16.5 of the Local Plan and Policy VT2 of the draft City Plan 2036. The existing servicing is on street, therefore the servicing is proposed to remain as existing. A cap for the number of vehicles servicing the development would be no more than 14 vehicles per day which would ensure the number of vehicles proposed, is equal to or less than the estimated existing situation. The applicant was required to demonstrate how servicing could be contained within the site, to make the proposals policy compliant. However, if the servicing was contained within the site, it would not be possible to deliver the new pedestrian route through, due to space limitations of the site. Therefore, on balance, on-street servicing is considered acceptable since it is as existing, there is a cap on the number of vehicles, and the proposals provide a public benefit in the form of a new pedestrian route.

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

The daylight and sunlight assessment demonstrates that there would be some loss of amenity with respect to daylight in a small number of rooms within 2 Greystoke Place as a result of the proposed development. However, the most impacted rooms benefit from dual aspect, which would continue to allow acceptable levels of daylight in each room as a whole. All of the windows assessed would receive more than 0.8 times their former value in respect of sunlight and would therefore be compliant with the criteria as set out in the BRE guidelines, resulting in a negligible impact upon the sunlight received by the nearby dwellings as a result of the proposed development.

The submitted sun on ground assessment demonstrates that the nearby residential and public open spaces would not be adversely affected by the proposed development, and would accord with the criteria set out in the BRE

Guidelines. The overshadowing assessment of 95 Fetter Lane (commercial) undertaken on 21 March showed that the eastern and western side roof terraces are likely to experience a noticeable effect from the proposed development. Currently, 67.5% of the eastern terrace and 75.3% of the western terrace receive 2 hours of sunlight on 21st March. Following the proposed development, 0% of the eastern terrace and 16.4% of the western terrace would receive 2 hours of sunlight on 21st March. However, given the spaces are not in residential use, the significance of the effect can be reduced, particularly as BRE guidelines recommend focus should be on nearby residential properties as they are more reliant on natural daylight and sunlight. However, given the spaces are in commercial use, the significance of the effect can be reduced, particularly as BRE guidelines recommend focus should be on nearby residential properties as they are more reliant on natural daylight and sunlight.

An objection was received stating that the proposed development would overshadow the nearby 12 New Fetter Lane resulting in a loss of daylight and sunlight to the offices therein, leading to a need for additional artificial lighting and an inferior working environment. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended. The report assesses the proposals against Strategic Policy CS10 which seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises such as offices are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises it is not considered to be such as to have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in these respects.

Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

Additional material considerations are as follows:

- Securing a development within the City, that would provide land uses which support the diversification, vitality and growth of the City as a world class business destination
- Increase in a diverse retail provision on the site, enhancing the retail offer in, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active street frontages.
- Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys.
- Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM 'outstanding', reduce carbon emissions, and reduce waste.
- The proposed building would result in a significant aesthetic enhancement to the Fetter Lane locality, through the use of high-quality faience materials to the new public house elevation and detailing inspired by its immediate neighbours, the proposed building would be an appropriate and sympathetic neighbour in architectural terms.

It is for the LPA to weigh the other material considerations and decide whether those that support the development outweigh the priority statute has given to the development plan.

When taking all matters into consideration, subject to the recommendations of this report it is recommended that planning permission be granted.

Recommendation

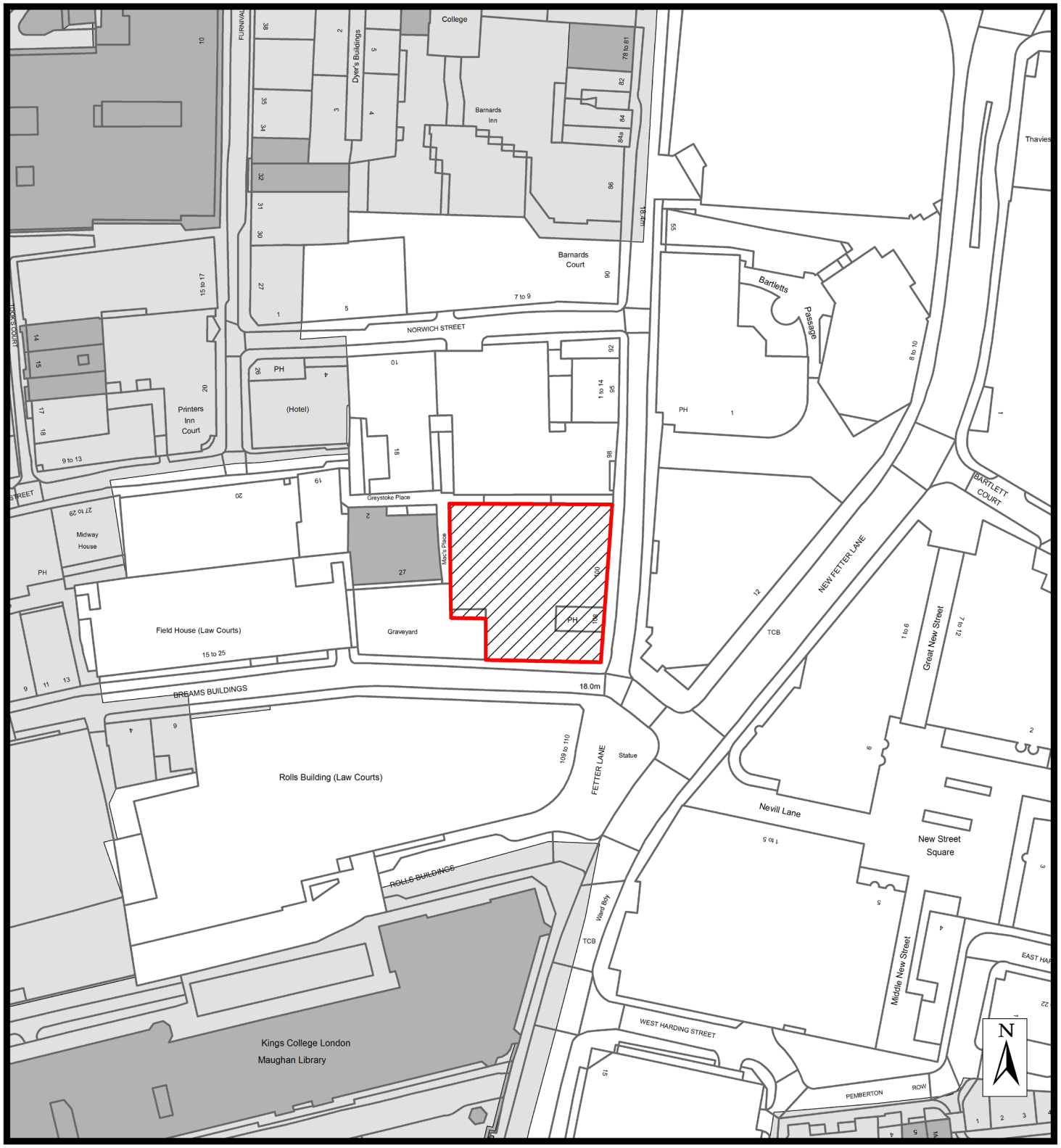
(1) That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:

(a) planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed.

(2) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.

(3) The Mayor of London be given 14 days to decide whether or not to direct the council to refuse planning permission (under Article 5)1)(a) of the Town and Country Planning (Mayor of London) Order 2008).

Site Location Plan



ADDRESS:

100 & 108 Fetter Lane
EC4A 1ES

CASE No.
21/00534/FULMAJ

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

DEPARTMENT OF THE BUILT ENVIRONMENT

Existing Building

White Swan Public House – Taken from DAS page 33

View along Greystoke Place from Fetter Lane looking west – taken from DAS page 33

View along Greystoke Place from Mac's Place looking east – taken from DAS page 34

View along Mac's Place towards St Dunstan's Garden – taken from DAS page 34

Existing servicing entrance along Greystoke Place – taken from DAS page 41

Main Report

Site and surroundings

1. The site comprises 100 Fetter Lane, 108 Fetter Lane, and Greystoke Place, and is bound by Fetter Lane to the east, Bream's Buildings to the south, St. Dunstan-in-the-West burial ground and Mac's Place to the west and 98 Fetter Lane to the north.
2. 100 Fetter Lane and 108 Fetter Lane were both built at the same time in the 1950's and were originally used for printing and publishing before being converted to their current uses over time. 100 Fetter Lane provides office accommodation over basement, ground and 7 upper storeys. 108 Fetter Lane is a 4 storey plus basement public house called The White Swan.
3. A UKPN substation is also located within the basement of 100 Fetter Lane which is only accessible for maintenance purposes.
4. There is no vehicle access to either building, with all deliveries, servicing and refuse collections taking place on street, unmanaged. There is no existing car, cycle or other forms of parking on the Site.
5. Greystoke Place is also located within the Site boundary and runs along its northern edge, providing a pedestrian route through to the west from Fetter Lane, linking to Mac's Place, St. Dunstan-in-the-West burial ground and No. 2 Greystoke Place. The upper floors of 100 Fetter Lane partially oversail Greystoke Place 98 Fetter Lane. The whole of this section of Greystoke Place is adopted public highway, with the underlying land in the ownership of the Applicant and within the Site boundary.
6. The existing building comprises 6,381sq.m (GEA) of office (Class E) floorspace and 463sq.m (GEA) of drinking establishment (Sui Generis) floorspace, with 30sq.m (GEA) occupied by the UKPN substation.
7. The existing building is not listed, nor is it located within a conservation area. Immediately adjacent to the west of the Site beyond Mac's Place sits the Grade II listed 2 Greystoke Place. The Chancery Lane Conservation Area is located nearby to the south, west and north.
8. It is located within the Background Wider Setting Consultation Area of LVMF Vista 5A.2 from Greenwich Park: the General Wolfe statue to St Paul's Cathedral.
9. The surrounding area is characterised predominately by commercial office buildings. Residential units are located immediately to the west at 2 Greystoke Place, and nearby to the north at 95 Fetter Lane.
10. The former burial ground of St. Dunstan-in-the-West (also referred to as St. Dunstan's burial ground in this report), immediately to the west of the site, is an open space which is understood to be open to the public from 8am to 7pm or dusk, whichever is earlier, excluding Christmas and New Years' Day. The burial grounds are owned by the London Diocesan Fund and maintained by the City Corporation.

Proposal

11. Planning permission is sought for the demolition of 100 Fetter Lane and the construction of a new building for office use (Class E) and a flexible commercial unit (Class E(a)(b)(c)(d)) comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works.

12. The proposed development would comprise:

Use	Floorspace (GIA)	Floorspace (GEA)
Office (Class E)	12,731sq.m	14,428sq.m
Cafe (Class E)	58sq.m	68sq.m
Flexible Commercial	187sq.m	244sq.m
UKPN (Sui Generis)	42sq.m	37sq.m
External publicly accessible space	226sq.m	226sq.m
Existing Public House	370sq.m	463sq.m

13. The proposed building would comprise basement (including a small sub-basement), ground, mezzanine plus 12 upper storeys and a roof plant level and would reach a maximum height of 75.1m AOD. At ground floor level, an office lobby accessed from Fetter Lane would provide entry to office floorspace located at floors 1 to 11. The basement would mainly house plant, storage, a UKPN substation and the sub-basement would house a rainwater attenuation tank.

14. The existing White Swan public house (108 Fetter Lane) would be retained.

15. The proposal includes a flexible retail unit on the north-east corner at ground level, instead of the new pub, as the existing pub would be retained in situ and built around. This new floorspace would be flexible Class E(a)(b)(c)(d) floorspace meaning it could be used for retail, a restaurant, financial or professional services or a gym (or similar uses).

16. New publicly accessible external space is proposed at ground floor level. A new pedestrian route is proposed linking Greystoke Place / Mac's Place with Breams Buildings to the south, between the proposed building and St. Dunstan's burial ground. This route would include a new pocket square adjacent to St. Dunstan's burial ground, which would be covered by the upper storeys of the proposed new building. A Cafe space (68sq.m GIA) is proposed fronting Breams Buildings and the new public realm between the site and St. Dunstan's Burial Ground, with access to both. It is also proposed to widen part of Greystoke Place and

set back the building line on the corner of Fetter Lane and Bream's Buildings. In total 226sq.m of new external publicly accessible space would be provided.

17. The pocket square is proposed to be gated for security and maintenance purposes. It would be open to the public between 6am and midnight. The opening hours and details of the management of this space and the other areas of permissive public realm within the proposed development will be secured by the S106 Agreement.

18. A total of 204 long stay and 28 short stay cycle parking spaces would be provided, with 10 of the short stay spaces provided within the new public realm. Access for cyclists would be via a dedicated cycle parking entrance at ground level off Mac's Place, with access also possible from Fetter Lane. The building is proposed to be car free as per the existing arrangement.

19. The building is proposed to be serviced from the street as per the existing arrangement. This would be subject to consolidation which would be secured via a S106 obligation.

20. The Proposed Development would include an extensive range of soft landscaping features to enhance urban greening biodiversity, including on the roof terraces, pocket square and edge planters. Where roof spaces cannot be accessed for practical reasons the surfaces would be greened where possible.

21. For the avoidance of doubt this application relates to 'Option B' as set out in the application documents. A separate application for a similar scheme which includes the demolition and relocation of the public house ('Option A') is also under consideration (app. no. 21/00454/FULMAJ).

Consultation

22. The applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders prior to the submission of the application including extensive pre-application consultation with key decision making authorities, key stakeholders and local community (including nearby residents). Given the impact of the COVID-19 pandemic remote engagement and consultation activities were undertaken comprising:

    - A meeting with Fleet Street Quarter
    - A meeting with St. Dunstan's burial ground (With CoL Open Spaces Officers in attendance).
    - Meetings with neighbouring occupiers including Weil Gotshal & Manages (London) LLP, MacFarlanes, Bird and Bird, The White Swan Public House and Owner/Occupiers of 2 Greystoke Place.
    - Email correspondence with other neighbouring occupiers who responded to consultation letters.

23. The responses to the pre-application consultation included: some concern over reduction in pub trading area; potential for the relocated

pub causing noise and disturbance; support for the proposed public realm enhancements; and queries over landscaping treatment for public realm, and their interaction with St. Dunstan's burial ground.

24. Following receipt of the application for planning permission, the application has been consulted upon and advertised on site and in the press. One letter of objection was received from Bird and Bird LLP, 12 New Fetter Lane.

25. Copies of all received correspondence making representations are attached in full and appended to this report. A summary of the representations received, and the internal and external consultation responses are set out in the tables below.

Consultation Responses	
Greater London Authority	Land Use Principles: The site is located in the CAZ and within the City of London which encourages the provision of new office space. The principle of office use is supported. the proposals are supported in principle. Offices: The City of London is projecting office growth of 1,150,000sqm of office space between 2011-2026. Its proposed submission draft plan 2036 projects 2,000,000 sqm of office space between 2016 and 2036. This proposal will help support this requirement. Urban Design: The approach to scale, massing and architecture is supported. The improved public realm increases connectivity and permeability of the area, which is supported, however the applicant should consider ensuring access is not restricted to certain times of the day. Heritage: The scheme is considered to have a positive impact on the setting of the nearby Grade II building. The impact on views, including strategic views, are acceptable. A watching brief during excavation is recommended in relation to archaeology remains. Transport: An Active Travel Plan and a contribution of Ł220,000 for cycle hire is required. Works required should be secured under Section 278 or as part of the Section 106 Agreement. Further consideration is needed in regard to onsite disabled persons parking and short-stay cycle parking. A DSP, CLP and a cycle promotion plan are required. Sustainable Infrastructure: Urban greening, biodiversity net gain, flood risk and sustainable drainage comply with

	policy requirements. Further information is required for energy, circular economy and water efficiency (for Option A). The applicant has provided additional information in relation to points raised for energy, which is currently being reviewed. The Whole Life Carbon Assessment has been re-submitted in the correct format and is currently under review. No information has been provided in relation to digital infrastructure therefore compliance with London Plan Policy SI 6 cannot be determined at this stage. Environment: Air quality impacts are generally acceptable. Further clarification is required, and the applicant has provided additional information in relation to points raised. This is currently being reviewed.
Officer Response to Comments	Consideration of the impacts on the Design, Heritage, Sustainability are set out in the report. The Applicant is willing to explore the provision of a Blue Badge Space within the vicinity of the site with the City Corporation. This would be secured through the S278 Agreement. The applicant is willing to contribute towards a Cycle Hire / Network Improvements Contribution. This contribution amount is still under negotiation between the applicant and Transport for London. A DSP, CLP and a cycle promotion plan are proposed to be secured via a S106 agreement.
City of London Police	Details of lighting within the proposed pocket park / public route to ensure it doesn't become a drinking hub.
Officer Response to Comments	A secondary entrance to the pub on Greystoke Place would be provided. Details of external lighting and a lighting strategy for the building are proposed to be conditioned.
Historic England	Responded confirming they have no comments to make.
Southwark Council	Responded confirming they have no comments to make.
Tower Hamlets	Responded confirming they have no comments to make.
Greenwich	Responded confirming they have no objections.
Camden	No response received

Lewisham	No response received

Objection from Neighbouring Residential Occupiers	
Representations	
Bird and Bird LLP, 12 New Fetter Lane	The proposals would cause harm to the setting of Grade II listed former YRM Offices. This is addressed in Heritage Assets section of the report. The proposals would result in the overshadowing of 12 New Fetter Lane. This is addressed in the report in the Overshadowing section of the report. The proposals would increase the Light Pollution to residential windows in No. 2 Greystoke Place. This is addressed in the Light Pollution section of the report.
Officer Response to Comments	The impact on the setting of Grade II listed former YRM Offices is addressed in Heritage Assets section of the report. The impact on overshadowing to this property is addressed in the Overshadowing section of the report. The impact of light pollution to the residential windows at No. 2 Greystoke Place is addressed in the Light Pollution section of the report.

Policy Context

26. The development plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

27. The draft City Plan 2036 was approved for consultation by the Court of Common Council in May 2020 and January 2021. The draft City Plan 2036 has been published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. As such, it is a material consideration in the determination of applications.

28. Government Guidance is contained in the National Planning Policy Framework (NPPF) February 2019 and the Planning Practice Guidance (PPG) which is amended from time to time.

Considerations

Relevant Statutory Duties

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

NPPF

30. The NPPF states at paragraph 2 that "Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise". In respect of sustainable development, the NPPF states at paragraph 10 that 'at the heart of the Framework is a presumption in favour of sustainable development.' At paragraph 11(c) the NPPF states that for decision-making this means 'approving development proposals that accord with an up-to-date development plan without delay…'.

31. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:

    1. the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
    2. the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
    3. the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)

32. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.

33. Chapter 6 of the NPPF seeks to promote Building a strong, competitive economy.

34. Paragraph 81 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

35. Chapter 8 of the NPPF seeks to promote healthy and safe communities.

36. Para 92 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.

37. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 105 states that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health”.

38. Paragraph 112 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.

39. Paragraph 113 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”.

40. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 126 advises that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

41. Paragraph 130 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.

42. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.

43. Paragraph 154 states that new developments should avoid increased

vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.

44. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment.

45. Paragraph 195 of the NPPF advises that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

46. Paragraph 197 of the NPPF advises, "In determining applications, local planning authorities should take account of:

    a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
    b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
    c) the desirability of new development making a positive contribution to local character and distinctiveness."

47. Paragraph 199 of the NPPF advises "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

48. Paragraph 200 of the NPPF states "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional"

49. Paragraph 202 of the NPPF states "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use." When carrying out that balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving the building or its setting.

50. Paragraph 203 states "The effect of an application on the significance of

a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

Other Guidance

51. The Historic England Good Practice Advice notes, including Note 3 The Setting of Heritage Assets.

Considerations in this case

52. In considering this planning application account has to be taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.

53. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

54. The principal over-arching issues in considering this application are:

- The extent to which the proposals comply with the relevant policies of the Development Plan.
- The extent to which the proposals comply with Government guidance (NPPF).

55. The principal site-specific issues in considering this application (in accordance with the over-arching issues above) are:

- Economic development and the provision of additional office accommodation.
- The acceptability of the scheme in design and heritage terms including impact on heritage assets and an assessment of the proposed public realm alterations.
- The impact of the proposal on any archaeology beneath the site.
- The accessibility and inclusivity of the development.
- The impact of the proposal in highway and transportation terms.
- The impact of the proposal in terms of environmental sustainability.
- The microclimatic impacts of the proposal.
- The impact of the proposal on air quality.
- The impact of the proposal in daylight and sunlight terms.
- The solar glare and light pollution impacts of the proposal
- Consideration as to whether fire safety has been taken into account in the design.

- The results of the Health Impact Assessment.
- The equality impacts of the proposal.
- The requirement for financial contributions

Economic Development and the Provision of Office Accommodation

56. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating Ł69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 520,000 people.

57. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can provide a significant competitive advantage.

58. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that a majority of businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to enter and flourish in the City.

59. Planning policy supports economic growth. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.

60. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2017 London Labour Market Projections and 2017 London Office Policy Review), that City of London employment will grow by 116,000 from 2016 to 2036, of which approximately 103,000

employees are estimated to be office based. London's rapidly growing population will create the demand for more employment and for the space required to accommodate it.

61. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.

62. The London Plan projects future employment growth across London, projecting an increase in City employment. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.

63. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.

64. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of flexible and adaptable space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.

65. The draft City Plan 2036 policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 2,000,000sqm during the period 2016-2036. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.

66. Despite the short term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and draft City Plan 2036 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations.

Proposed Office (Class E) Provision

67. The application site currently accommodates 6,000sq.m (GIA) of office space. The application proposal would deliver 12,731sq.m (GIA) of office space on the site. This equates to a total uplift in office space across the site of 6,731sq.m (GIA).

68. Office space would be provided at 12 levels of the new building. The floorplates have been designed to have good daylight conditions, consistent floor depths and allow for a flexible multi tenancy arrangement. The terraces at levels 5-9 and 12 would provide amenity space for future occupiers.

69. This would provide further flexibility for occupiers in terms of the site's offer and would accord with policy S4 of the draft City Plan 2036 which encourages the provision of affordable office workspace in the City. The office space within proposed new building is of a high quality.

70. The improved and enlarged office accommodation supports the aims of Local Plan policy CS1 and the Proposed Submission Draft City Plan 2036 policy S4 and would provide flexible office floorplates for workers which are designed to meet the needs of a wide range of potential occupiers, in accordance with Policy DM1.3 in the adopted Local Plan and Policy OF1 in the Proposed Submission Draft City Plan 2036.

Provision of retail (Class E)

71. The proposal would incorporate two ground level retail units that would enable a range of retail/restaurant/cafe uses to come forward. A cafe would be located on the south elevation of the site, fronting Breams Buildings and the new public realm between the site and St. Dunstan's burial ground (78sq.m (GIA). A retail unit is proposed to be created on the north east corner of the site, fronting Fetter Lane. This would provide 187sq.m (GIA) of flexible commercial floorspace (Class E (a), (b), (c), (d)) The site is not located in a Principal Shopping Centre (PSC) or Retail Link as defined by the Local Plan.

72. The introduction of these retail units is welcomed as it would provide additional active frontage to the Bream's Buildings and Fetter Lane elevations, enliven and bring vibrancy to the new public realm between the Site and St. Dunstan's burial ground and to Greystoke Place, and would provide services for workers and residents. A condition is recommended to ensure that the spaces are used for retail/restaurant/cafe use are not changed to any other use within Class E.

73. It is considered that this provision would accord with Local Plan policies CS20, DM1.5 and DM20.4 and draft City Plan policies S5 and OF1 which seek to ensure that a complimentary mix of uses is provided in conjunction with office space along with provision of services for workers and residents.

Design

Principle: Demolition of the existing building

74. The site is not within a conservation area and none of the buildings are listed.

75. The existing building is the surviving half of a larger building known as Oyez House, designed by T.P. Bennett and constructed in the early 1950s for the Solicitor's Law Stationary Society. It incorporated offices, printing works and two public houses: the Printer's Devil to the north and the White Swan to the south, which bookended a loosely symmetrical brickwork composition over a Portland stone base which rose in scale towards the western end of the site. In the 1980s, Oyez House was subdivided into two distinct and self-contained halves. Subsequently in the early 21st century the northern half was redeveloped as a new office building, 98 Fetter Lane, including the demolition of the former Printer's Devil public house.

76. The surviving southern half of Oyez House (excluding the White Swan public house) is an office building rising to seven storeys over a basement at its highest level and is of brickwork with punched window openings and a Portland stone ground floor treatment. The building has been subject to alteration and partial recladding. It is considered a nondescript example of its type and date and the principle of its demolition is acceptable.

77. The White Swan public house is considered to be a non-designated heritage asset of a moderate level of historical significance and a low level of architectural significance. This element of the site would be retained and integrated into the proposed development. This principle is acceptable.

Height and bulk

78. The site is located towards the west of the City. The proposed building would rise to a height of 75.1m AOD and would comprise thirteen floor levels and a plant room over a basement.

Design approach

Architecture

79. Externally, the proposed development would take the form of four individual blocks, responding to the site's various townscape settings: green open space and lower-rise buildings to the west and mid-rise, taller buildings to the east. Reading as a series of different buildings, the proposed development would vary in scale, height, form and would bring a great richness of materiality and architectural exuberance to this part of the City.

80. The tallest and most prominent element would be the main block. It would present full elevations to Fetter Lane and Breams Buildings and partial elevations to the north and east. The main block facades would be arranged on a grid system with expressed metal columns carrying

thick horizontals of crushed concrete in an orange hue. These strata of solid material would give the main block a monumental, solid quality in townscape views and would frame recessed apertures shaded with aluminium fins. Brise soleils would be arranged across the south and east elevations only where required to mitigate sunlight, serendipitously expressing the sun's path across the faces of the building. The main core of the building would be located against the inner face of the stair core, allowing the staircases to be expressed through the glazing of the east elevation.

81. The main block would integrate the existing White Swan public house. Architecturally this would be honestly expressed, resulting in an unusual frisson between traditional and new materials, scale and detailing. The public house would 'interrupt' the lower levels of the main block to Fetter Lane, with the crushed concrete strata pausing and then resuming again along the elevation. To allow daylight and fresh air to reach the windows on the south elevation of the public house, the architecture of the south-east corner of the main block would be stripped back to the crushed concrete strata which would incorporate areas of planting above a terrace located on the roof of the main entrance. This would be framed by a dramatic triangular entrance with a chamfered building line, expanding the public realm and creating a dynamic focal point in townscape views. There would be a void above the retained public house. Details of all junctions between the retained public house and the proposed development would be secured via condition.

82. The double-height ground floor elevations would be of solid crushed concrete with irregular punched openings, including between the retained public house and the new blue block, playing on the forms and design of traditional frontages. At the top of the main block would be a smaller two-storey element comprising an upper plant room and lower pavilion providing access to the southerly roof terrace. The upper plant room and building crown would be of metalwork, comprising a mesh screen with wraparound aluminium fins. There would be extensive greening to the roof terrace.

83. A new, jewel-like block would be located in the north-east corner of the site, inspired by the existing White Swan and the wider typology of London public houses. It would take the form of a four-storey block with elevations to Fetter Lane and to Greystoke Place. It would be entirely constructed of shimmering glazed brick, electric-blue in colour, with a series of regular punched window openings at higher level. At ground floor level, the frontage to Fetter Lane would be an ingenious 'negative image' of the existing pub's traditional frontage, an approach carried around on the Greystoke Place elevation. The final details of the elevations, including their enrichment through the incorporation of stamped and embossed details to the punched openings, would be secured via condition.

84. To the west of the site, a pavilion block would address the burial ground. This part of the development would take the form of a six-storey block faced in smooth grey crushed concrete with regular punched window

openings. Above, its stepped roof form would provide green terraces for the building occupants, while the pavilion would be lifted off the ground floor plane to allow a new public route through the site to snake from Bream's Buildings to Mac's Place. Between the main block and pavilion would be a north-south bay of the development which would carry an extensive green walling system intended to address and complement the former burial ground. This green 'slice' would mediate between the pavilion and the main block in height and would have a stepped roof form that would provide external terraces to various floor levels of the main block. Like the pavilion, it would be lifted off the ground floor for the new public route.

Public Realm

85. The proposals would transform the public realm around the site. Currently, the existing building offers no form of accessible public space at ground floor level and no active frontages apart from the existing public house. Contrastingly, the proposed development would create a significant amount of new publicly accessible space at ground floor level in the form of a new route between Bream's Buildings and Mac's Place. At a maximum of 3.4m wide and 5.5m high, this route would significantly enhance the locality's permeability and amenity and with the public house would incorporate a new cafe at the south entrance, fronting Breams Buildings, to boost the quantum of active frontages offered by the proposed development. It would have the effect of significantly widening Mac's Place by setting the building line further back. The proposed new route would incorporate an attractive sunken garden as a green space for people to dwell; traversing the eastern boundary of the burial ground, it would allow for new perspectives and experiences of that important open space. Details of the junctions between the new route and the burial ground would be secured via condition.

86. The proposed development would offer further gains of public realm to the south-east corner of the site, where the proposed chamfered entrance would release more of the footway, and at the north-east corner, where the north frontage of the blue block would be set back to create a wider entrance to Greystoke Place – 3.15m instead of the existing width of 2.15. Further along its length, the height of Greystoke Place would be raised from 2.79m to 4.1m. As well as these spatial improvements, Greystoke Place would incorporate a tiled mural referencing the history of printing in the locality. This theme would also be expressed in carvings on edges, reveals and columns across the ground floor plane. Details would be secured via condition.

87. Lighting would be integrated throughout the ground floor plane, varying between wall-mounted uplighters on the elevation, feature lighting to artworks and other similar elements and luminaires integrated into the ground and soffit of the new public route. This would ensure the sophisticated architecture and spatial qualities of the development are appreciated after nightfall and final details would be secured via condition.

Heritage Assets

Strategic views – London View Management Framework

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

89. The proposed development has the potential to impact three Assessment Points: Protected Vista 5A.2 (Greenwich Park) and River Prospects 16B.1 and 16B.2 (Gabriel's Wharf). The magnitude of change in these is considered negligible and would accord with the visual management guidance for both, preserving the viewers' ability to recognise the Strategically Important Landmark (St Paul's Cathedral) and other landmarks in the views.

5A.2 – Greenwich Park looking from the General Wolfe statue to St Paul's Cathedral

90. The site of the proposed development is within the Background Wider Setting Consultation Area of assessment point 5A.2 of this Protected Vista. At 75.100m AOD, the proposed development would rise above the height threshold of between 52.1m and 53.6m in this part of the Protected Vista. However, the proposed development would be entirely obscured in the view by the existing buildings immediately to the east: No. 12 New Fetter Lane and No. 6 New Street Square, the latter of which is significantly taller than the proposed development.

91. The guidance for this view states that the background of St Paul's Cathedral in the view is mostly unimpeded, with a clear silhouette of the dome above the peristyle, and the western towers, and that the ability to see sky between the upper parts of the various elements is crucial to the viewer being able to recognise and appreciate St Paul's Cathedral in this panorama (para 142). The guidance goes on to say that the dome (above the peristyle) and the upper parts of the western towers of St Paul's Cathedral are well defined against their background in this view. Development that exceeds the Wider Setting Consultation Area in the background of this view should preserve or enhance this level of definition (para 147).

92. Being totally screened by existing taller buildings in the Protected Vista, it is considered that the proposed development would accord with the visual management guidance for this view and would preserve the skyline definition of the Cathedral. Regard has been had to a future hypothetical scenario in which the proposed development is visible in the Wider Setting Consultation Area and not screened by existing taller buildings. The site is located at the southern edge of the Wider Setting Consultation Area, meaning that even if the proposed development was unscreened and visible in the background of the Protected Vista it would appear at some distance away from the Cathedral. Moreover, it considered that the height, form, massing and materiality of the proposed development would result in an understated skyline presence which would preserve the level of definition of the upper parts of the

Cathedral in this view and consequently the ability to recognise the Strategically Important Landmark.

16B.1 and 16B.2 – Gabriel's Wharf

93. The proposed development would be visible towards the westerly edge of this River Prospect. The relevant LVMF guidance states that both Assessment Points are orientated towards St Paul's Cathedral, the Strategically Important Landmark. It goes on to state that the river dominates the foreground of the view, while the middle ground consists of mature trees leading from Temple towards the buildings on the Embankment near Blackfriars Bridge. Buildings between these provide a rich and intricate skyline (paras 276-277). Since the LVMF guidance was published a number of modern buildings are now visible on this skyline.

94. From both Assessment Points, the upper floors and rooftop of the proposed development would appear above the trees of the Inner Temple Garden (grade II Registered Park and Garden), directly above the unlisted Inner Temple Library and immediately east of the spire of St Dunstan-in-the-West (grade I). In the view, the proposed development would rise slightly higher than this spire with a substantive sky gap in between. The proposed development would mediate between the scale of the spire and the much taller modern buildings at No. 12 New Fetter Lane and No. 6 New Street Square, the latter of which being the tallest building visible in this part of the panorama.

95. The Visual Management Guidance for this view states that new development should preserve or enhance the townscape setting of St Paul's Cathedral in this view (para 281). It further notes that there are several landmarks and historic buildings other than St Paul's Cathedral in the view, which aid the viewers' strategic appreciation of London. The viewer's ability to recognise these landmarks should be preserved or enhanced (para 282). Although the proposed development would be visible in this view, it would be situated at such a distance from the Cathedral that it is considered that it would preserve its townscape setting. Additionally, the proposed development would preserve the viewer's ability to read the riverside landmarks in the view.

Summary of LVMF Impacts

96. The proposed development would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LMVF SPG.

Impact on significance and setting of listed buildings

YRM Offices – grade II listed

Significance and contribution of setting

97. Office building of 1962 incorporating a penthouse flat, by architects Yorke, Rosenberg and Mardall as their own headquarters. This firm were ground-breaking modernists and Yorke had been one of the first British

modernist architects. The building's crisp white lines, fine detailing and quality as an example of modernist architecture are all noted approvingly by the list entry. The building therefore possesses a high degree of architectural significance and a moderate degree of historical significance for its place in the history of modernist architecture and its role in the propagation of that style in Britain.

98. The building's list entry makes it clear that special interest derives from the building's setting, stating that it is 'a sensitive integration of a frankly modern office building within an ancient street pattern, relating unusually well both to the narrow alleyways to the north and to the former churchyard with its retained boundary walls and railings to the south'. The building's relationship to these north and south features therefore contributes highly to its significance.

Impact assessment

99. The massing and design of the western side of the proposed development has been shaped by the need to respect the setting of the listed building. Accordingly, the scale of the pavilion block would match that of the listed building, its smooth grey facades would complement the tiling of the listed building and the pavilion fenestration would harmonise with that of the listed building. Moving east, the green 'slice' of the development would set views of the listed building and the pavilion block against a spreading green wall, designed to play on and extend the existing greening of the burial ground; the new route skirting the eastern edge of the churchyard would widen Mac's Place and enrich the network of alleyways to the north. The proposed development would thus preserve those elements of setting to the north and south which contribute to the significance of the listed building and would enhance the eastern setting of the listed building by replacing the inactive, hard frontage of the existing building with a green new public route centered on a new cafe and sunken garden.

<u>Maughan Library – grade II* listed</u>

Significance and contribution of setting

100. Former Public Records Office of 1855 and extended in 1896. The initial part of the building was designed by Sir James Pennethorne and was extended by Sir John Taylor; the two phases are in the same Gothic style but distinguished by the use of Bath stone dressings for the former and Portland for the latter. Pennethorne's original block is aligned. The building has high architectural significance as a highly individual interpretation of the Gothic style in the early days of the Gothic revival; it was the first major public building in this style after the completion of the Houses of Parliament. It possesses further architectural significance as an early example of a purposefully fireproofed building employing iron members and forgoing heating. The building has very high historical significance for its role as the nation's archive. It has additional historic significance for its associations with Sir James Pennethorne and Sir John Taylor, both leading architects of their day. The building also holds

a degree of archaeological significance for the way if incorporates part of the chancel arch of the demolished C13 Rolls Chapel.

101. The building's historical significance as a repository for the nation's records is buttressed by its setting in the City's legal quarter. The building is within the Chancery Lane conservation area and faces Westminster's Strand Conservation Area, meaning that, to the west, the building sits comfortably in a setting of masonry buildings – historic and modern – of a largely consistent scale. To the east, the building's setting has undergone greater change, chiefly due to second world war bombing. In the approach from Fleet Street up Fetter Lane, the building is perceived amidst modern blocks of a largely sympathetic scale. It has group value with a grade II listed K2 kiosk on Fetter Lane. Further along Fetter Lane, No. 12 New Fetter Lane and No. 6 New Street Square form prominent modern elements in views of the Fetter Lane elevation of the building. As a looser and more modernised area of the City, the building's easterly setting contributes little to its significance.

Impact assessment

102. The proposed development is located to the north of the Maughan Library. Currently, in views of the Maughan Library's Fetter Lane elevation looking north, the existing building on the site can just be glimpsed beyond Nos. 109-110 Fetter Lane, which sits between the two. To the east side of Fetter Lane, No. 12 New Fetter Lane and No. 6 New Street Square are dominant modern elements in the background.

103. In views of the Maughan Library looking north, the proposed development would form a prominent new modern element in the background. It would rise up behind Nos. 109-110 Fetter Lane with much of the south elevation visible. The height of the proposed development would sit between Nos. 109-110 Fetter Lane and No. 12 New Fetter Lane. The high-quality modelling and materiality of the façade of the proposed development would enrich the group of modern buildings which sit behind the Maughan Library. The proposed development would therefore not have a jarring effect on the setting of the listed building but would be perceived as an augmentation of the existing group of modern buildings in the background.

Impact on Conservation Areas

Chancery Lane Conservation Area

104. The site of the proposed development does not lie within a conservation area but is situated near to the Chancery Lane conservation area, elements of which lie to the north, west and south.

105. The conservation area is dominated by several significant public buildings – the former Patent Office and the former Public Records Office (both grade II*) – and a high-quality group of Victorian and Edwardian masonry buildings. It contains an exceptional span of building ages and styles, from secular medieval buildings such as Staple Inn (grade I) to well-considered 21st century insertions.

106. The proposed development would be visible in a view from within the conservation area, looking east from Chancery Lane along Breams Buildings. Within the conservation area, the historic and modern buildings along this street are characterised by red brickwork with blue brick details and stone dressings. They frame a view of the trees of St Dunstan-in-the-West burial ground. The upper storeys of No. 12 New Fetter Lane and No.6 New Street Square form the backdrop of the view. In this view, the proposed development would provide a characterful, high-quality backdrop, with its eye-catching horizontal strata of orange crushed concrete relating well to the buildings in the conservation area. It would sit comfortably in scale with the modern buildings that can already be perceived in the background of the view.

107. The proposed development would also appear in views along the eastern periphery of the conservation area. In the view looking south from Holborn down Fetter Lane, the proposed development would form a prominent tall new element. It would appear as a bookend to the row of conservation area and non-conservation area buildings which line the northern half of Fetter Lane. Although higher in scale than them, it would be read as forming part of the taller group of modern buildings associated with New Street Square. Its crushed concrete strata would help it to relate to the varied materiality of the conservation area buildings in this view. In the view looking north from the K2 telephone kiosk on Fetter Lane, the impact of the proposed development would be much as stated in the section on the Maughan Library above.

108. The proposed development would only be visible in a limited way in relation to the conservation area – and, where visible, it would largely read as an augmentation of the modern buildings of New Street Square. It would have no specific impact on any individual building or group of buildings within the conservation area. Accordingly, it is considered that the proposed development would not be harmful to the character and appearance of the conservation area.

Non-designated heritage assets

<u>The White Swan Public House</u>

109. The White Swan is an example of an early post-war public house. It was designed by Sidney C. Clark, chief architect to Charrington's Brewery, and comprises four-storey brick elevations with regular metal window openings and Portland stone dressings. It possesses a traditional-style public house frontage to the ground floor level on Fetter Lane. The building is reincarnation of another public house with the same name which previously existed further to the north of the site until it was destroyed in World War Two. Insurance records demonstrate that there has been a public house of this name on Fetter Lane since as early as 1815. Therefore, it is considered that the existing public house holds a moderate level of historical significance as the latest in a long lineage of public houses bearing this name. Furthermore, it is considered that the building has a degree of historical interest in the association with architect Sidney Clark, a notable and extremely prolific public house architect of the interwar years. Several of his public houses have since

been listed at grade II. The White Swan is a late and possibly rare post-war work – he retired in 1959 – and the building's simple, well-executed neo-Georgian frontage to Fetter Lane is considered to hold a low level of architectural significance as a well-executed albeit simple example of the type. The White Swan public house is thus considered to be a non-designated heritage asset for the purposes of this application.

110. The proposed development would entirely subsume the existing public house, framing it with a new, high-quality elevation of crushed concrete, glass and metalwork elements. The juxtaposition of the existing materiality and scale of the public house with that of the proposed development would be dynamic. By setting it within a totally modern architectural form, the proposed development would draw out the architectural qualities of the existing public house. It is considered that the proposed development would provide a dramatic new context for the existing non-designated heritage asset and would not be detrimental to its historic or architectural significance.

St. Dunstan-in-the-West burial ground

111. The burial ground is a rough quadrilateral in shape, indented in the north-east corner, raised around three feet in height above street level. It is divided from the street by a brick retaining wall incorporating steps, railings and gate piers. Immediately behind the railings are three large plane trees protected by Tree Preservation Orders. The layout of lawn, planting beds and paths won a landscaping award scheme in 2006.

112. The burial ground was formed in the early modern period as an additional burial ground to serve the church of St Dunstan in the West on Fleet Street. It was used for burials between the early modern period (c.1600) and the mid-nineteenth century, meaning it possesses a high degree of historical significance for its associations with past City communities. It possesses further historical significance as a rare instance of a second graveyard serving a City church. Architecturally, the burial ground possesses a moderate degree of significance as a well-preserved example of its type retaining key features such as brickwork walls, railings and tombstones.

113. The proposed development would enhance the setting of this non-designated heritage asset by replacing the inactive, hard frontage of the existing building with a green new public route centered on a new cafe and sunken garden. The eastern setting of the burial ground would be visually enhanced through the more permeable and articulated elevation, varied material palette, greater degree of active frontage and more extensive urban greening; the latter would constitute an enhancement in biodiversity terms too. The new route provided through the site along the eastern boundary of the burial ground would provide new perspectives on the non-designated heritage asset.

Protected Trees

114. There are three London Plane trees located within St. Dunstan's burial ground that are protected by Tree Preservation Orders. The trees are located on land under the management of City Gardens. Local Plan

policy CS19 seeks to protect the amenity value of trees, retaining and planting more wherever practicable. Draft City Plan 2036 policy OS4 seeks to protect trees which are subject to a Tree preservation Order.

115. All of the trees are located outside of the application site. Tree protection measures are proposed during demolition and construction works. These would include tree protection boxes and ground protections within the Root Protection Areas (RPA) of the closest trees where necessary due to their proximity to the application site. Conditions are proposed to provide final details of these protection measures.

116. The closest tree to the site is proposed to be pruned back to the site boundary. City Gardens have reviewed the proposals and consider them to be acceptable, subject to any works to the trees being agreed in advance with the City and undertaken by City Gardens at the Applicant's expense. An informative is included to this effect.

Conclusion on Heritage Impact

117. Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).

118. Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. As the statutory duty imposed by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged, considerable importance and weight must be given to the desirability of preserving the setting of listed buildings, when carrying out the paragraph 202 NPPF balancing exercise

119. Paragraph 203 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset

120. The proposed development would enhance the settings of the grade II listed YRM Offices and the burial ground of St Dunstan-in-the-West, a non-designated heritage asset. It would provide a dramatic new setting for the White Swan, a non-designated heritage asset.

121. In all other respects the proposed development would preserve the significance and settings of designated and non-designated heritage assets in the locality.

Culture

122. Local Plan policies CS11 and DM11.2 and draft City Plan 2036 policy S6 encourage new cultural experiences and art works. The City of London Cultural Policy seeks to improve the City's public realm, open spaces and gardens to make them more open, distinct, welcoming and culturally

vibrant. The site is located close to the western edge of the City's Culture Mile and the proposal incorporates several elements which will improve the cultural enjoyment of the site.

123. The design seeks to contribute to the City's culture by creating a new pocket garden that can be enjoyed by everyone, not just the buildings' occupants. The aim of opening up the open space on the western side of the ground floor and creating a new publicly accessible sunken garden which will complement the existing public open space will provide opportunity for social engagement. The retention of the public house use would also continue to provide a place for people to meet and socialise.

124. The design proposals include introducing embossed typeface lettering into the masonry facades of the public realm which would add visual interest and reference the historical printing use of the site.

Archaeology

125. The site is in an area of archaeological potential situated outside the walled City and to the west of the now buried River Fleet. There is potential for remains from all periods to survive in this area and an Archaeological Desk Based Assessment is submitted with the application.

126. The Assessment confirms that the existing basement encompasses most of the entire area of the footprint of the site. The potential for remains to survive below the building is low due to disturbance by construction of the basement floor and foundations. There is potential for deeper cut features to survive, such as wells, pits and earlier building basements. These features may include Roman occupation, as the site is between two principal roads leading into the City, and post-medieval occupation. It is considered that there is low potential for survival of Roman burials, as burials have been recorded in the vicinity. The western section of the churchyard of St Dunstan in the West, appears to encroach into the site in the post-medieval period and there is a low potential for remains to survive within the site.

127. A condition is recommended for an archaeological watching brief to be carried out to record ground conditions and any archaeological remains revealed by the development. An informative is recommended to cover consideration of the archaeological impact in the event that additional groundworks, outside the building footprint, such as new drainage or service connections are proposed.

Access and Inclusivity

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

129. The new ground floor would be lowered to pavement level allowing all pedestrian approaches to the building to be accessible from all four elevations at street footway level.

130. The new office entrance would be recessed to provide shelter from the weather, centrally located on the corner of Fetter Lane and Bream's Buildings. New revolving doors would be located centrally with a dedicated automatically opening pass door immediately adjacent to it.

131. The existing public space to the west of the site is not accessible due to the steps and higher level of the gardens. A new publicly accessible pedestrian link is proposed between Bream's Buildings and Mac's Place along the western edge of the site. This new route will provide access to a new sunken garden which will be publicly accessible.

132. Two new passenger lifts would serve all levels of the building from Basement to 12th Floor which includes an evacuation/passenger/goods lift and a fire-fighting lift. Two other passenger lifts would serve Ground to 10th floor. This provides independent and dignified access and means of escape for disabled people unable to use stairs.

133. A dedicated and prominent cyclist entrance (which would be clearly signposted) from ground floor level has been integrated into the design of the building via two dedicated entrances on Fetter Lane and Mac's Place, along with accessible amenities and facilities for cyclists including lockers, showers and WC facilities at Ground and Mezzanine level. 5% of cycle parking would be suitable for parking cycles used by disabled people.

134. Accessible roof terraces are provided at all levels from Ground, 5th to 9th and 12th floor levels for use by all office occupiers of the building.

135. Gently graded slopes (more than 1:21 gradient) are provided at ground floor level to accommodate level differences around the perimeter of the site.

136. The Access Officer welcomes the inclusive access to and within the building which would meet the requirements of Local Plan policy DM10.8 and London Plan policy D5.

Transportation

Cycling

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

138. The proposed cycle parking is set out below:

London Plan long stay cycle parking	**Proposed long stay cycle parking**	**London Plan short stay cycle parking**	**Proposed short stay cycle parking**
197	204	26	28

139. The long stay cycle parking would be accessed from Mac's Place at ground floor level. Officers consider this to be an appropriate location for the cycle parking, and being largely at ground floor, cycling will be celebrated. The new pedestrian route from Mac's Place to Bream's Buildings, would give visitors and workers arriving to the site with bicycles two options to access the cycle parking. Additional access to the cycle parking would be available from Fetter Lane, via the servicing entrance.

140. The proposed short stay cycle parking would be provided entirely within the site boundary at ground floor level. 8 spaces would be located within the new public realm (private land) adjoining the northern end of Mac's Place. One stand would be located on Greystoke Place (on private land) which will provide space for two cycles. The remaining 18 spaces would be provided within a new publicly accessible cycle store. This would be located adjoining the new pocket park and visible from Breams Buildings and the new route through the site.

141. The proposed cycle parking is in excess of the London Plan requirements.

142. 5% of the cycle parking spaces (10 spaces) would be accessible for adapted cycles and this arrangement will be secured by planning condition (in line the London Plan Policy T5 (Cycling) with the London Cycling Design Standards 8.2.1, and the draft City Plan 2036).

143. The proposals include 22 showers, and 222 lockers, which complement the cycle parking provision. The London Plan Policy 10.5.7 recommends a minimum of 2 lockers per 3 long-stay spaces, and at least 1 shower per 10 long-stay spaces. Therefore, the proposals meet the London Plan recommendations.

144. The applicant would be responsible for promoting the use of the cycle parking spaces and as such would be required, by Section 106 obligation, to produce a Cycling Promotion Plan, which is a cycling focused Travel Plan. It would be required to be submitted to the City for approval in line with the London Plan Policy T4 (Assessing and mitigating transport impacts). The Cycling Promotion Plan would be expected to set out how the internal short stay cycle parking spaces will be advertised and accessed by the public.

Vehicular access

145. London Plan Policy T6 (Car parking), Local Plan 2015 Policy DM16.5 and the draft City Plan 2036 Policy VT3 require developments in the City to be car-free except for designated Blue Badge spaces.

146. The development is car free and no blue badge car parking space is proposed due to space constraints at the ground floor. The Applicant is willing to explore the provision of a Blue Badge Space within the vicinity of the site with the City Corporation. This would be secured through the S278 Agreement.

Servicing and deliveries

147. Policy DM16.5 of the Local Plan 2015 and the draft City Plan 2036 Policy VT2 require developments to be designed to allow for on-site servicing. London Plan Policy T7 (Deliveries, servicing and construction) requires development proposals to provide adequate space off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.

148. The servicing of the building would take place on-street on Fetter Lane, which would be contrary to policy DM16.5 of the Local Plan and Policy VT2 of the draft City Plan 2036. The existing servicing is on street – therefore the servicing is proposed to remain as existing. The applicant has agreed on a cap for the number of vehicles servicing the development per day of 14. This would ensure the number of vehicles proposed is equal to or less than the estimated existing situation (of 14 vehicles per day).

149. The applicant was required to show how servicing could be contained within the site, to make the proposals policy compliant. However, if the servicing was contained within the site, the new pedestrian route through would not be possible, due to space limitations. Therefore, on balance on-street servicing is considered acceptable since it is as existing, there is a cap on the number of vehicles, and the proposals provide a public benefit in the form of a new pedestrian route.

150. The draft City Plan 2036 Policy VT2 requires major commercial development to provide for freight consolidation. London Plan Policy T1 (Strategic approach to transport) requires development 'to minimise freight trips on the road network including through consolidation'. Proposal 38 in the City of London Transport Strategy is to 'Reduce the number of freight vehicles in the Square Mile'. The City of London Transport Strategy defines freight consolidation as 'routing deliveries to a business, building or area via a warehouse where they are grouped together prior to final delivery.' The City of London Freight and Servicing SPD, point 63, requires suppliers to use consolidation centres in suitable locations within Greater London to minimise the number of trips required to service developments. In order to meet the cap of 14 vehicles per day the applicant has agreed to use an off-site consolidation centre.

151. The draft City Plan 2036 Policy VT2 requires delivery to and servicing of new developments to take place outside peak hours (0700-1000, 1200-1400, and 1600-1900 on weekdays) and requires justification where deliveries within peak hours are considered necessary. The applicant has agreed to no servicing at peak times 0700-1000, 1200-1400, and 1600-1900, in line with the City of London Transport Strategy. The applicant has agreed to a further restriction on servicing between the hours of 2300 to 0700 the next day which would be conditioned.

152. The development will be required to produce a delivery and servicing plan (DSP), and this will be secured in the Section 106 agreement.

Public Transport

153. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B. The site is located close to Chancery Lane underground and Farringdon underground and Thameslink services. The site is close to several bus routes running close by on High Holborn and Chancery Lane (within 400m).

Pedestrian Comfort

154. A PCL assessment has not been conducted for the site. A PCL assessment was not considered necessary, given the scale and location of the development. The trip generation assessment conducted for Option A has been used as the basis for assessment for this application (Option B), as Option A gives the greatest trip generation and is considered the most robust assessment.

155. The proposed development is predicted to result in 226 additional trips in the AM peak and 207 additional trips in the PM peak. It is predicted that the total increase in the number of trips to the development across the whole day would be 1654. The uplift is considered acceptable due to the excellent cycle parking provision, the proposed alterations to the surrounding existing public realm to be secured through a S278 agreement, and the new route through the site.

156. The submitted transport assessment indicates that the overall increase in trips across all modes would have a minimal impact on the surrounding highway and public transport network capacities.

157. The applicant has proposed to chamfer the south eastern corner of the development to improve the pedestrian comfort at the junction of Fetter Lane and Breams Buildings, this is considered a benefit of the scheme. The applicant has also proposed a new route through the development from Bream's Buildings to Mac's Place.

158. The new pedestrian route will also provide enhanced public realm, and cycle parking on private land. The new route would be permissive path and open to the public between 6am and midnight, with access secured through the S106 agreement.

Public Realm, Security and Hostile Vehicle Mitigation (HVM)

159. Local Plan 2015 Policy DM3.2, the draft City Plan 2036 Strategic Policy S2 (Safe and Secure City), and Policy SA3 (Designing in Security) set out how appropriate security and safety provision must be incorporated into all development. Policy D11 (Safety, security and resilience to emergency) of the London Plan states development proposals should include measures to design out crime that, in proportion to the risk, deter terrorism, assist in the detection of terrorist activity and help mitigate its effects.

160. Security proposals to protect the building and the new areas of public realm have been developed in consultation with the Designing Out Crime and the Counter Terrorism security officers within the City of London Police.

161. The HVM will be mainly within the facade of the building. As part of the public realm design, we will work with the City of London Police to ensure the new public realm is safe and secure (e.g. at the entrance of Mac's Place). A condition to this effect is recommended.

Construction Logistics

162. The applicant has submitted a Deconstruction Environmental Management Plan for approval as part of this application. The applicant has worked with the City's Highways team to ensure the logistics plan is acceptable and obstructions on the highway are limited. The applicant has also engaged with BT and UKPN to arrange a temporary substation on Bream's Buildings while the demolition and construction works are taking place. The Deconstruction Environmental Management Plan is considered acceptable in planning terms, however the applicant is still required to gain the necessary highway approvals and licences prior to deconstruction work commencing.

Section 278 Agreement

163. A commitment to enter into a Section 278 agreement has been secured. The Section 278 agreement would comprise improvements to pedestrian crossing facilities at the junction of Bream's Buildings, Fetter Lane and New Fetter Lane to better facilitate east/west pedestrian movement, works to tie the new building line and new route into the public highway on Mac's Place, public highway lighting improvements, footway surrounding and through the site to be replaced with York stone, improvements to Bream's Buildings to enhance the setting of the churchyard, provision of a blue badge parking space, and any cycle improvements necessary to allow access to the cycle parking. The Section 278 works will be in line with the 10 Healthy Streets indicators, the City of London Transport Strategy and City of London's Public Realm vision. This would be secured through the Section 106 agreement.

Transportation Conclusion

164. The proposal would accord with the relevant transportation related policies including London Plan policies T5 cycle parking, T6 car parking, and D11 Safety, security and resilience to emergency. It accords with the Local Plan 2015 Policy DM3.2, and the draft City Plan 2036 Policies AT1, AT2, AT3, SA3, and VT3. The proposals are not in line with Policy DM16.5 of the Local Plan 2015, or draft City Plan 2036 Policy VT2 – all relating to deliveries, servicing and construction. However, the proposals are considered acceptable.

165. Overall the proposal would promote active travel through the excellent provision of the cycle parking and would deliver significant public realm improvements particularly through the introduction of a new north/south route which represents an increase of 226sqm of publicly accessible space.

Waste Storage

166. Local Plan policy DM17.1 requires development schemes to incorporate waste facilities and allow for the separate storage and collection of recyclable materials.

167. The proposals incorporate a bin store at ground floor level. This store would serve the office, cafe and drinking establishment uses. Prior to collection, bins would be transferred to a temporary holding area within the building, closer to the servicing entrance. Waste collections would take place from a loading bay on Fetter Lane at suitable frequencies.

168. The City of London's Cleansing Team have confirmed that the proposed waste storage and collection facilities complies with their requirements.

Sustainability

Circular Economy

169. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. Emerging City Plan 2036 Policy S16 sets out the City's support for Circular Economy principles.

170. The submitted Draft Circular Economy Statement describes the strategic approach to incorporating circularity principles and actions according to the GLA Circular Economy Guidance. The proposals to redevelop the site are a result of an assessment of opportunities to retain the building as a whole or in part.

171. The existing, original structure of the building is concrete encased steel that is extremely complicated to adapt. The structural investigation showed signs of heavy modifications due to extensions in the past, and no information is available as to whether any strengthening works have been carried out for the extensions. However, past changes to the structure have caused corrosions in the steel sections. In addition, the existing building floors are formed from hollow-pot slabs which are known to lack robustness and adaptability.

172. The foundations were researched on the basis that these should be similar to the ones found at 98 Fetter Lane which was constructed together with the building on the application site. The same engineers' and architects' teams were involved at No 98 that carried out the investigations for the redevelopment in 2015 with the finding that the foundations had a mix of concrete encased grillage foundations and concrete rafts and included large elements of masonry foundations that were presumed to be from the pre-1940's buildings destroyed in the war.

173. The variability of construction types and materials in the original construction of the substructure would make it unsuitable to be retained as a basis for a larger development.

174. In addition, the office floor plates have very low floor to ceiling heights below 3 metres that would not provide high quality office spaces once building services within raised floors and/or below ceiling slabs have

been included. The existing ground floor level is raised and cannot be adapted to provide level access from the street, surrounding pedestrian routes and gardens, without substantial demolition and strengthening works.

175. Overall, it is considered that a refurbishment and extension would require substantial demolition above and below ground with high embodied carbon emissions impact, along with considerable limitations to the achievable quality and flexibility of office floorspace.

176. However, the retention of the perimeter retaining basement walls to assist during construction and to reduce embodied carbon emissions of new construction will be considered in the detailed design phase.

177. The applicants are committed to achieve a low impact building by committing to

- Incorporating low carbon materials, including considering recycled materials for the primary facade, e.g. rammed concrete with recycled aggregates or bricks made from recycled materials
- Recover materials at maximum value and facilitate off-site re-use wherever possible, aiming for 95% reuse/recycling/recovery of demolition and construction and extraction waste
- Minimising material consumption and incorporating future flexibility in the structure and configuration of internal spaces
- Selecting materials that are easier to install and that are durable, with low wastage rate and using less energy and requiring less maintenance and replacement
- Focussing on designing for longevity, adaptability and ease of disassembly.

178. A Detailed Circular Economy Assessment and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm that high aspirations can be achieved have been requested by conditions. The detailed assessment will be expected to demonstrate that the relevant targets set out in the GLA Circular Economy Guidance can be and have been met.

Energy and C02 emissions

179. The Energy Statement accompanying the planning application demonstrates that the development has been designed to achieve an overall 59% reduction in regulated carbon emissions compared with a Building Regulations compliant building.

180. The proposed energy demand reduction strategy would reduce the building's operational carbon emissions by 16% compared to a Building Regulations compliant building and includes the following main elements:

- Designing the building with high thermal mass, creating a robust, prefabricated masonry structure with deep reveals to provide natural shading and thermal insulation, in the south-west facing

facades further setbacks behind planters integrated into the facade

- Providing additional shading fins only where necessary based on annual solar studies
- Providing operable shading awnings on the terraces
- Providing low level and high-level opening windows combined with a simple, mixed mode floor air distribution for zero energy cooling for large parts of the year
- Enabling night-time ventilation to cool soffits that provide natural cooling during the day
- Optimised daylight and thermal insulation levels within office floorspaces through optimised glazing to solid ratio.
- Providing wastewater heat recovery for the showers.

181. The office element would operate using a Complementary Mixed Mode strategy with Concurrent operation, meaning that the background mechanical ventilation (with or without cooling) operates in parallel with natural systems. The aim is to combine active (e.g. heat pumps and active cooling systems) and passive (natural ventilation, night-time purge cooling) systems that enable occupants to open windows to control thermal comfort. Natural ventilation has been maximised and cooling loads have been kept to a minimum through the incorporation of the passive design measures. Heat recovery on the main mechanical ventilation systems will improve the overall energy efficiency of the strategy.

182. The energy strategy for the proposed flexible commercial floorspace that is designed as shell at this stage only, would be the future tenant's responsibility.

183. There is currently no available district heating network close enough to the site, however, the opportunity to connect to a future district heating network would be incorporated into the proposed development.

184. The proposed renewable energy technologies are air source heat pump systems (ASHP) and an at least 30sq.m Photovoltaic (PV) panel installation integrated into the roof plant enclosure screens on level 12 where there would be least impact of self-shading. These technologies would contribute carbon emissions savings of 44% compared to a Building Regulations compliant building. The provision of PV panels on the roof of the plant enclosure was explored, but this must be 85% free area in order to facilitate adequate air flow to the air source heat pumps.

185. The flexible commercial floorspace element of the building would achieve an overall 59% reduction in carbon emissions compared to a Building Regulations compliant building, 16% of which through energy demand reduction.

186. The site-wide energy strategy demonstrates compliance with the London Plan carbon emission reduction targets. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion

stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

BREEAM

187. BREEAM New Construction 2018 pre-assessments have been prepared for the office and retail uses. The strategy aims to achieve an "Outstanding" rating for the offices on the basis of a "full fit-out". The assumptions made as part of the preliminary pre-assessment indicate that the proposals can meet all the mandatory level requirements for the targeted rating including a score of >85%. The pre-assessment indicates a score of 88.30% and aims to achieve a high number of credits in the City's priority categories of Energy, Water, Pollution and Materials. Further credits could be targeted in the detailed design phase and fit-out phase of the development.

188. The separately assessed flexible retail floorspace would achieve an "Excellent" rating with a score of 72.30%. It is anticipated that this area would be progressed as a 'shell only' scheme and as such the number of credits available is more limited. Additionally, the scheme cannot award points for the innovative building services strategy proposed for the wider development and consequently would be unable to achieve a higher rating of "Outstanding".

189. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2036 Policy DE1. Post construction BREEAM assessments are requested by condition.

Whole Life-Cycle carbon emissions

190. London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.

191. Since the existing building on site has been found unsuitable for refurbishment and extension, the proposed Whole Life-Cycle carbon

reduction strategy is based on reducing embodied carbon impacts of the new sub and superstructure as main contributors to the overall whole life-cycle carbon emissions of the building. This includes the rationalisation of the structure, the use of cement replacements, recycled products, robust materials and structural design as well as providing material passports for ease of extending the lifespan of the building and building parts.

192. Another important part of the strategy is providing simplicity of operation that reduces the need for extensive ductwork and services distribution and suspended ceilings, and has low maintenance requirements, and ultimately reduced whole-life carbon emissions. The design strategy offers a looser fit with robust shell and adaptable services that can be readily altered operationally or physically to suit the needs of different occupiers, activities, and even sectors over the life of the building.

193. Over the proposed building's whole life-cycle, the embodied carbon emissions calculations at planning stage demonstrate emissions in line with the Greater London Authority's standard benchmark emissions target. It is anticipated that during the detailed design stage further improvements can be achieved, in particular in the product stages A1 – A3 of the building's life cycle. These results are based on the Option A application; however it is considered that the variations of the Option B proposals would not have any significant impact on the results. A detailed Whole Life-Cycle carbon assessment incorporating improvements that can be achieved through the detailed design stage, and a confirmation of the post-construction results have been requested by conditions.

Urban Greening and Biodiversity

194. Local Plan Policy DM19.2 promotes Urban Greening and Biodiversity, DM 10.2 (Design of green roofs and walls) and 10.3 (Roof gardens and terraces) encourages high quality roof gardens and terraces.

195. The development would include an extensive range of soft landscaping features with intensive green roofs, green walls, roof terraces, planters and pocket square which would enhance urban greening, biodiversity and visual interest. Greenery would be included in the publicly accessible sunken garden and continue along the western frontage with a strip of planting boxes.

196. The private terraces (700sq.m) across Levels 5, 6, 7, 8, 9 and 12 would include flowering herbaceous planting along the edge perimeter to aid biodiversity. The planting would include a mixed palette of seasonal perennials, evergreen shrubs and grasses. Multi-stem trees would be integrated into the planting to help mitigate the wind and provide sun shelter and visual connection with nature to promote wellbeing. In addition, invertebrate, bird and bat boxes would be located in suitable locations.

197. The roof terraces would begin at Level 5 and have been designed to not immediately overlook nearby residential premises as they would be above the roof level. In addition, planters on the western edge of this

terrace would provide an inaccessible area next to the balustrade to prevent direct overlooking. The outdoor private break-out areas for the occupiers on the terraces would provide important amenity spaces. A condition is proposed to restrict the hours of use of the terraces to protect the amenity of the nearby residents.

198. Local Plan Policies DM10.2 (Design of green roofs and walls), DM10.3 (Roof gardens and terraces) and DM19.2 (Biodiversity and Urban Greening) encourage the inclusion of green roofs, gardens and walls. The biodiverse features would provide a green and attractive setting as there are hard roof surfaces on the existing and some of the surrounding buildings and would result in a net gain in biodiversity value to the site. The landscaped roof terraces would serve as important amenity spaces for occupiers of the buildings with views across the City. The green walls and climbers would assist in improving air quality and appropriate plant species should be carefully selected for the living walls depending on their aspect.

199. The addition of the trees, planting, green roofs and green walls on this development are welcome not only for their aesthetic value when viewed from nearby buildings but also for their contribution to biodiversity and urban greening (Policy DM19.2), rainwater run-off, insulation and urban cooling. The proposals therefore accord with Local Plan policies DM10.2, DM10.3 and DM19.2. The proposed urban greening should be appropriately maintained for the life of the proposed development.

200. An Urban Greening Factor (UGF) calculation score has been submitted with the application along with a table providing a breakdown of the proposed urban greening. The UGF has been calculated as 0.35, which meets both the London Plan and the City's draft Local Plan UGF target score of 0.3 for commercial development.

201. Final details of the quality and maintenance of the proposed urban greening are required by condition.

Climate Change Resilience

Water resources

202. The submitted Sustainability Statement acknowledges that the UK will experience half as much rainfall by 2080 as a result of climate change. A range of water conservation measures have been designed into this scheme.

203. A blue roof at level 12 would be supplemented with an attenuation tank using "Smart Tank" technology at basement level for rainwater harvesting to use for irrigation and toilet flushing. For the same purpose, the greywater from showers would be recycled.

204. Further reductions in potable water will be achieved through the specification of sanitary ware with low flow fittings and leak detection in order to achieve a 50% improvement over baseline building water consumption.

Flooding

205. The site is not located within the City Flood Risk Area.

206. The development aims to achieve greenfield run off rates through the incorporation of Sustainable Drainage Systems (SuDS) including a blue roof on the external terraces and an attenuation tank. The 'smart tank' technology also allows rainwater collected in the attenuation tank to be recovered for WC flushing and irrigation, further supplemented by the collection of greywater from showers.

207. Final details of the SuDS and associated components are reserved by condition.

Heat Stress

208. The sustainability statement outlines measures to prevent overheating by including natural ventilation openings, as part of a mixed mode system that incorporates free cooling through the exposed slab, within an optimised facade system to manage solar gain and maximise daylight access. These measures will not only reduce the need for carbon intensive air conditioning but will help to make the building resilient to higher temperatures and urban heat island effects.

Natural Capital and Pest & Diseases

209. The proposed development will incorporate urban greening that would improve significantly on the existing quantity and quality of urban greening on site, both as public realm enhancement and biodiversity gain overall. This will help to enhance biodiversity providing green routes and small habitats. The details of the landscape planting will be important in ensuring that the plants and habitats created are resilient to hotter dryer summers, warmer wetter winter, more extreme weather events and pests and diseases.

210. Overall, this development includes a range of measures which will improve its resilience to climate change. Details of these measures will determine how effectively the building performs in coming decades, and conditions are attached to seek more detailed modelling and planting plans against the UK Climate Projections UKCP18 to 2080.

Conclusion

211. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing.

212. The proposed development, by way of its central location within London, its opportunities for providing a positive and healthy work/life environment, and its environmental credentials, would positively contribute to the economic, social and environmental sustainability of the

City of London. The proposed sustainability strategy overall meets, and exceeds in some aspects, London Plan policies as well as Local Plan policies, and it is on track to achieve an "outstanding" BREEAM assessment rating.

213. The proposals indicate that Whole Life-Cycle Carbon emissions can be significantly reduced in line with the GLA's standard benchmark. The existing building has been assessed and found to be unsuitable to be transformed into a new, attractive and sustainable development. However, Circular Economy principles can be positively applied to achieve a long term, robust, low carbon, flexible and adaptable development. The building design responds well to climate change resilience by reducing solar gain, incorporating natural ventilation, water saving measures and various opportunities for urban greening and biodiversity while passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond London Plan requirements.

Microclimatic Impacts

Wind Microclimate

214. CFD simulation and analysis has been carried out in accordance with the City's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

215. Wind conditions are compared with the intended pedestrian use of the various locations including carriageways, footways and building entrances The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Wind Microclimate Guidelines, being 5 Comfort Categories defining conditions suitable for frequent sitting/occasional sitting/standing/walking/Uncomfortable.

216. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.

217. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance - if conditions become unsafe or unsuitable for the intended use as a result of the development. If wind conditions become windier but remain in a category suitable for intended use, or if there is a negligible or beneficial effect, wind mitigation is not required.

218. Assessments have been carried out for both the Windiest Season and the Summer Season.

Existing Baseline Conditions

219. The baseline scenario indicates that the Site and nearby surrounding area has conditions ranging from suitable for frequent sitting to walking use during the windiest season. Generally during the summer season, wind conditions are one category calmer, and range from suitable for

frequent sitting to standing use. No strong winds exceeding the safety threshold would occur in this configuration.

220. All thoroughfare locations within and around the Site have wind conditions suitable for frequent sitting to standing use during the windiest season.

221. The majority of existing entrances around the Site have wind conditions suitable for frequent sitting to standing use during the windiest season. The exception to this is at an entrance to the south of Great New Street which have walking use conditions. The entrance to the White Swan pub on the eastern elevation of the existing building has wind conditions suitable for occasional sitting use.

222. Pedestrian crossings around the Site have wind conditions ranging from suitable for occasional sitting to standing use during the windiest season.

223. Amenity spaces at ground level are located to the east of 110 Fetter Lane (to the south of the Site) and at St Dunstan Park to the west of the Site. The amenity space to the east of 110 Fetter Lane has wind conditions suitable for occasional sitting use during the summer season. Wind conditions at Dunstan Park are suitable for frequent sitting use during the summer season.

224. Wind conditions at upper level amenity spaces directly to the north and west of the Site range from frequent sitting to standing use during the summer season, with localised area of walking use conditions at the southern edge of 98 Fetter Lane highest roof terrace.

Proposed Building with Existing Surrounding Buildings and Proposed Landscape

225. In the presence of the Proposed Development, conditions would increase in windiness compared to the existing scenario, particularly between the Proposed Development and 12 New Fetter Lane to the east as well as on Bream's Buildings as winds get channelled between the buildings. Conditions would range from suitable for frequent sitting to standing use with localised areas suitable for walking use during the windiest season, and frequent sitting use to standing use during the summer season, however would still be considered to be acceptable for the intended uses.

Thoroughfares

226. The majority of thoroughfares within and around the Site would have wind conditions suitable for frequent sitting to standing use during the windiest season. Localised areas to the south-east of the Proposed Development and on Great New Street, would have wind conditions suitable for walking use. The wind conditions at Great New Street would be consistent with the existing baseline and thus are considered appropriate for the intended use.

Entrances

227. The majority of existing entrances around the Site have would have wind conditions suitable for frequent sitting to standing use during the windiest season. The exception to this is at an entrance to the south of Great New Street, which would have conditions suitable for walking use. These conditions are consistent with the Baseline scenario, which confirms that the conditions are not caused or adversely impacted by the Proposed Development.

228. The introduction of the south-eastern terrace on level one (which is not proposed in option A) would reduce the amount of high-speed winds directed to ground level and thus wind conditions would be expected to remain similar or calmer than in Option A at ground level. As such, the entrance of the White Swan Pub (in its existing location) would have standing use or calmer wind conditions during the windiest season, suitable for the intended use.

Pedestrian Crossings

229. Pedestrian crossings around the Site would have wind conditions ranging from suitable for occasional sitting to standing use during the windiest season. These conditions would continue to be suitable for the intended use.

Amenity Spaces

230. Amenity spaces at ground level are located to the east of 110 Fetter Lane (to the south of the Site), at St Dunstan Park to the west of the Site, the proposed pocket park immediately to the west of the Proposed Development.

231. The existing amenity spaces would continue to have similar wind conditions to the baseline and would range from suitable for frequent sitting use to occasional sitting use during the summer season. These conditions would be suitable for the intended use.

232. The proposed new pocket park would have wind conditions suitable for frequent sitting to occasional sitting use during the summer season. These conditions are appropriate for amenity use.

233. As more winds are likely to be channelled across the newly introduced terrace (on the south east corner), wind conditions would be expected to range from frequent sitting to walking use during the summer season. It would be expected that with appropriately developed dense landscaping of shrubs, hedging and trees to the windy areas of the terrace could be reduced to range from suitable for frequent sitting use to standing use during the summer season. A condition would be recommended to submit details of wind mitigation measures prior to implementation.

Wind Microclimate Conclusion

234. In conclusion, with the proposed mitigation measures in place, where wind conditions become windier at ground level and upper level terraces, they remain suitable for the intended uses in the proposed scenario and so no additional mitigation above that proposed is required. The details of the proposed mitigation measures will be secured by condition and will be required to be maintained throughout the life of the building.

235. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the CFD analysis against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the submitted application, and if any material adverse impacts are realised, mitigation measure would need to be explored and implemented.

236. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with London Plan Policy D8, Local Plan policy DM10.1, and draft City Plan policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

Thermal Comfort Assessment

237. London Plan Policy D8 and D9 and Draft City Plan 2036 Policy S8 indicates that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings - wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Draft City Plan Strategic Policy S12 requires developers to take account of the potential microclimate and thermal comfort impacts from tall building development at an early stage in the design process. Draft City Plan Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.

238. In accordance with the City of London Thermal Comfort Guidelines an outdoor thermal comfort assessment has been prepared. The technique involves merging wind, sunlight, temperature and humidity microclimate data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.

239. The Universal Thermal Climate Index (UTCI) metric will be utilized for predicting thermal comfort. The usage categories for thermal comfort is set out below and is used to define the categorization of a given location.

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

240. All areas have been assessed for all hours in a year between 8:00 am and 8:00 pm (GMT), as specified by the City of London Thermal Comfort Guidelines. This analysis was conducted for two configuration; Existing Site with Existing Surrounding Buildings and Proposed Development with Existing Surrounding Buildings and Proposed Landscaping.

Existing Baseline Conditions

241. The proposed first floor terrace space at the south-eastern corner of the Proposed Development services the adjacent office only. As such, we would apply the same thermal comfort expectations to this space as the other on-site terraces discussed previously.

Existing Baseline Conditions

Ground Level

242. The vast majority of the current pedestrian realm in the area surrounding the site has all season or seasonal thermal comfort conditions, with all season conditions situated to the west and seasonal conditions situated to the east. Areas of short-term conditions are also situated to the east around the northern corner of 6 New Square Street along Barlett Court, along Great New Street and along Nevill Lane. The majority of the areas in the pedestrian realm around the existing Site have suitable thermal comfort conditions for their intended uses. The exception is at outdoor cafe seating along Nevill Lane, where short term conditions were predicted. This would be one category lower than required for ground level outdoor seating. while conditions in this space during the winter were predicted to be acceptable for less than 50% of the time; conditions

were predicted to be acceptable for more than 80% of the time in the remainder of the year.

Off-site Terrace Levels

243. The existing off-site terraces were predicted to have mainly all season and seasonal thermal comfort conditions. Isolated areas of short-term conditions were predicted around the eastern corner of the Rolls Building and on the corners of Chancery Lane. As none of the existing off-site podium or roof level terraces have sensitive receptors that would require long term comfort, these thermal comfort conditions are considered suitable for their current usage.

Proposed Building with Existing Surrounding Buildings and Proposed Landscape

Ground Level

244. With the proposed development in place, the thermal comfort conditions at ground level are predicted to remain broadly similar to the existing baseline conditions. Some areas along Bream's Buildings, the northern side of Fetter Lane and Plough Place were predicted to move from all season to seasonal thermal comfort conditions. In addition, to the south, east and north of the Proposed Development, there would now be larger areas of seasonal conditions (these areas previously were predicted to have all season conditions). The alterations to the thermal comfort conditions would still be considered to be suitable for its intended use in these areas. There would be isolated areas of short-term conditions to the north and east of the proposed development and around the south eastern corner of 12 Fetter Lane.

245. The majority of the areas in the pedestrian realm around the existing Site have suitable thermal comfort conditions for their intended uses, with the outdoor cafe seating along Nevill Lane remaining in the short-term category. As these conditions occur in the baseline and do not become materially worse with the introduction of the Proposed Development, mitigation measures would not be required.

On-Site Terrace Levels

246. The terraces on the proposed development would largely have suitable conditions (all season and seasonal thermal comfort conditions) with the proposed landscaping in situ. An isolated area of short-term conditions was predicted on the 9th level terrace around the north-western corner. As these terraces are to be used for offices, there would be no designated seating and as such this isolated area of short-term conditions can be considered acceptable.

247. The proposed first floor terrace space at the south-eastern corner of the Proposed Development would serve the office only. As such, the same thermal comfort expectations would be applied to this space as the other on-site terraces. The positioning of this space in the development would lead to the potential for breezy conditions as wind is drawn around the building from south to east. The wind speeds are likely to be tempered due to the parapet and landscaping elements shown in the plans. These are positive features. Access to direct sunlight at this terrace is expected

to be lower given the height of surrounding buildings, however, the three-story void to the underside of the fourth floor above is a positive feature which provides the space access to skylight and potentially direct sun depending on the time of year. It is expected that this space would be generally comfortable during warmer weather but during the winter conditions may be perceived as cool, particularly if the landscaping provides insufficient wind control in winter. Thus, while the space is unlikely to achieve the all-season comfort categorisation, the comfort conditions here would be expected to be appropriate for the terrace's intended use.

Offsite Terrace Level

248. The introduction of the Proposed Development was not predicted to have any material impact on the thermal comfort conditions of the existing podium and roof level amenity spaces in the local area. Thus, the thermal comfort conditions of the surrounding podium and roof terrace levels in proposed scenario would be the same as those predicted in the existing baseline scenario, which were suitable for the intended use.

Thermal Comfort Conclusion

249. The introduction of the proposed development would not be predicted to change the thermal comfort conditions at ground level or surrounding terraces to the point that they would be incompatible with the current use types. The terrace levels of the proposed development would largely have acceptable thermal comfort conditions for their intended use. The 9th level terrace would have short term conditions around the north-western corner. As these terraces are to be used for offices, there would be no designated seating and as such short-term conditions can be considered acceptable.

Air Quality

250. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Draft City Plan policy DE1 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all developments to be at least Air Quality Neutral. The requirements to positively address air quality and be air quality neutral are supported by policy SI1 of the London Plan.

251. An air quality assessment has been submitted in conjunction with the proposal. The assessment considers the impact of the proposed development on air quality as a result of the construction and operational phases of the development.

252. During demolition and construction dust emissions would increase and would need to be controlled in order to avoid significant impacts. Mitigation measures and dust control measures would need to be put in place on the construction site. Details of mitigation measures have been submitted as part of the Demolition Environmental Management Plan. The Department of Markets and Consumer Protection have reviewed the plan and consider the proposed mitigation measures acceptable.

253. The proposed development would be car free and heating will be through an electric air source heat pump system with no onsite combustion. The number of vehicle trips associated with the development is below the threshold for requiring assessment. Therefore, the development should not have any adverse impacts on air quality.

254. The Proposed Development would be considered air quality neutral in relation to both building and transport emissions.

255. The City's Air Quality Officer has no objections to the proposal and recommends that conditions are applied requiring the submission of an Air Quality Report to demonstrate how the finished development would minimise emissions and exposure to air pollution during its operational phase, and that the developer/contractor signs up to the Non-Road Mobile Machinery Register.

256. Subject to the compliance with conditions, the proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2036, policy SI1 of the London Plan which all seek to improve air quality.

Daylight, Sunlight and Overshadowing

Assessment Context

257. An assessment of the impact of the proposed development on the daylight and sunlight received by surrounding residential buildings and public amenity spaces, has been submitted in support of the application. The effects of the development have been assessed having regard to the recommendations in BRE Report 209, Site Layout Planning for Daylight and Sunlight: A guide to good practice (second edition, 2011).

258. Policy DM10.7 of the Local Plan seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the BRE guidelines. Policy DE8 of the emerging City Plan 2036 requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards, taking account of the BRE guidelines.

259. The BRE guidance advises that numerical values are not to be rigidly applied but recognise the specific circumstances of each case. This is acknowledged in the supporting text to policy DM10.7 which states that "The Building Research Establishment (BRE) has issued guidelines that set out several methods of assessing changes in daylight and sunlight arising from new developments. The City Corporation will apply these methods, consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations".

260. The assessment submitted in support of the application has assessed the impact of the proposed development on the daylight and sunlight received by the residential properties at 2 Greystoke Place and 95 Fetter Lane. Overshadowing assessments have been undertaken in respect of

the private amenity spaces of 2 Greystoke Place, the public space of St. Dunstan's burial ground, and the roof top terrace of 98 Fetter Lane.

Daylight

261. Regarding daylighting, the vertical sky component (VSC) and daylight distribution tests have been applied. The VSC test measures the amount of skylight available at the centre of a window on the external plane of the window wall. The BRE guidelines state that a window which achieves a VSC of 27% or more is considered to provide good levels of light. If with the proposed development in place the figure is both less than 27% and reduced by 20% (0.8 times its former value) or more than the existing level, the loss would be noticeable.

262. As the VSC calculation does not account for the size of the window being tested, the size of the room that it lights or whether there are multiple windows serving a room, the BRE guidelines recommend that the results should be read in conjunction with those of a second test - daylight distribution. The daylight distribution test, also referred to as the No Sky Line test (NSL), calculates the areas of a working plane inside a room (usually 0.85m above the finished floor level) that would or would not have a direct view of the sky. The BRE guidelines state that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% (0.8 times its former value) or more, the loss would be noticeable.

263. In addition, the Applicants have undertaken and submitted supplementary Average Daylight Factor (ADF) and Radiance Assessments of the daylighting to the affected residential apartments within 2 Greystoke Place. The radiance diagrams are contained within the plans pack.

264. The Average Daylight Factor (ADF) assessment is a measure of the overall amount of diffuse daylight within a room that is measured at a working plane 0.85m above a room's finished floor level. The ADF can be calculated a number of ways but the most commonly used methodology is the formula set out in the BRE guidelines. This formula takes account of: the size and shape of a room and its serving window(s); the actual or reasonably assumed reflectance values of a room's internal surfaces (walls, floors and ceiling); the diffuse transmittance of the glazing to the serving window(s); and the amount of visible sky, which is calculated through a Vertical Sky Component assessment.

265. The BRE Guidelines recommend an ADF of 5% or more if no supplementary electric lighting is to be used within a room, or 2% or more if supplementary electric lighting is provided. The guidelines recommend the following minimum ADF values for residential properties: 1% for bedrooms, 1.5% for living rooms and 2% for kitchens.

266. A Radiance Assessment is a lighting simulation tool that measures the individual 'daylight factors' at a number of given points (usually based on a grid) within a room (or defined space). Similar to measuring the ADF of a room, this method of assessment takes into account the total glazed

area to a room, the transmittance quality of the glazing, the total area of the room's internal surfaces, including ceilings and floors, and their reflectance values (which may be actual or reasonably assumed). The radiance method of assessment also takes into account the quantum of light reflected off external surfaces, including the ground and nearby buildings.

267. Whilst there is currently no established guidance regarding what constitutes a 'noticeable' or 'significant' change in daylight when using the BRE guidelines ADF formula or Radiance methodology, the radiance based assessments can draw upon the BRE's recommended ADF target values. Radiance assessment results are presented as floor plans colour rendered to illustrate the individual daylight factors within room, which range between 0% and 5%. The average value of the individual daylight factors within a room can be expressed as an ADF percentage for the room as a whole.

2 Greystoke Place

268. Located to the west of the development site, this property contains commercial office space on the lower and raised ground floors and residential accommodation on the 1st to 5th floors. There are 10 flats within the building, of which 7 flats have windows to the eastern end facing toward the site. The windows which face towards the site serve dual aspect living/kitchen/dining rooms and the bedrooms are located towards the western end of the building. The main windows which serve the dual aspect living/kitchen/dining rooms are located on the north and south elevations of this building and therefore orientated perpendicular to the proposed site. The windows which face directly towards the site (on the eastern elevation) are high-level ribbon / slot windows.

269. A total of 24 windows serving 8 rooms have been assessed using the Vertical Sky Component (VSC) methodology, with the results showing that 15 of the windows would receive less than a 20% reduction in accordance with the BRE criteria and therefore the effect is considered to be negligible.

270. The seven high level slot windows located on the east elevation would experience reductions of between 53% and 78% which would be considered to be a major adverse impact. Two windows located on the north elevation of the 2nd and 3rd floors would receive a reduction of 21%-22%, marginally over the BREs criteria of 20%, which is considered to be a minor adverse impact.

271. Whilst these particular windows would experience a noticeable effect, the main windows for each of these rooms on the north and south elevations would predominantly experience small reductions which are within the BRE guidelines.

272. The daylight distribution results using No Sky Line (NSL) calculations show that all rooms would experience small reductions in daylight distribution which are within the BRE guidelines criteria. The overall daylight effects, when using the VSC and NSL tests are therefore negligible and can be considered acceptable.

273. The Radiance results demonstrate where there would be a reduction in the daylight factor within the affected rooms. This reduction is most notable in the areas of the rooms directly lit by the high-level east facing window. The results also show that the principal north or south facing windows would continue to provide good levels of natural light into the rooms.

274. The Average Daylight Factor results show that one living / kitchen / dining room (R1/12) would experience a reduction in ADF from 2.21% to 1.96%, which would be marginally below the minimum criteria for kitchens but well within the living room criteria. The remaining rooms assessed would have an ADF in excess of 2.2% which would be above the minimum criteria for all standard room types.

95 Fetter Lane

275. This property is located to the north of the site and contains residential accommodation. A total of 18 windows serving 15 site facing rooms have been assessed for daylight.

276. For the VSC assessment, three of the windows would receive no reduction as a result of the proposed development, and 15 would receive small reductions in light well within the BRE guidelines criteria.

277. The daylight distribution test shows that the majority of the rooms would receive no reduction in daylight distribution. One room would receive a reduction of 0.1% from existing levels, well within the BRE Guidelines criteria. The overall daylight effects for 95 Fetter Lane would be negligible and are considered acceptable.

12 New Fetter Lane

278. An objection was received stating that the proposed development would overshadow the nearby 12 New Fetter Lane resulting in a loss of daylight and sunlight to the offices therein, leading to a need for additional artificial lighting and an inferior working environment.

279. Local Plan Strategic Policy CS10 seeks to ensure that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Policy DM10.7 of the Local Plan seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the BRE guidelines.

280. The BRE Guidelines state that they are “intended for use in rooms in adjoining dwellings where daylight is required… The guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices”.

281. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural

daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. 12 New Fetter Lane is a modern office building and already designed to rely on electric lighting.

282. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises, including 12 Fetter Lane, the proposed development provides a degree of separation such that it would not have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 and DM10.7, or the BRE Guidelines.

Daylight Conclusion

283. Overall, the assessments submitted in support of the application demonstrate that there would be some loss of amenity in a small number of rooms within 2 Greystoke Place as a result of the proposed development. However, the most affected rooms benefit from dual aspect, which would continue to allow acceptable levels of daylight in each room as a whole.

Sunlight

284. Regarding sunlight, the BRE guidance recommends that all main living rooms of dwellings should be checked if they have a window facing within 90 degrees of due south. The available sunlight is measured in terms of the percentage of annual probable sunlight hours (APSH) at the centre point of the window. Probable sunlight hours is defined as "the long-term average of the total number of hours during a year in which direct sunlight reaches the unobstructed ground (when clouds are taken into account)". Sunlighting of a dwelling may be adversely affected if the centre of the window:

    - Receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and
    - Receives less than 0.8 times its former sunlight hours during either period and
    - Has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.

285. To clarify, all three of the above criteria need to be met for there to be an adverse impact in sunlight terms.

<u>2 Greystoke Place</u>

286. Of the eight rooms assessed for daylight, five have at least one site facing window which is orientated within 90 degrees of due south. The assessment demonstrates that the windows assessed would receive a reduction in APSH of less than 20%, which would be compliant with the BRE guidelines criteria, and is considered a negligible impact.

95 Fetter Lane

287. Of the 15 rooms assessed for daylight, one has a window which faces within 90 degrees of due south. The assessment demonstrates that this window would receive a reduction in APSH of 5.6%, well within the BRE criteria of 20% reduction, and would be considered a negligible impact.

Sunlight Conclusion

288. All of the windows assessed would receive more than 0.8 times their former value and would therefore be compliant with the criteria as set out in the BRE guidelines, resulting in a negligible impact upon the sunlight received by the nearby dwellings as a result of the proposed development.

Overshadowing

289. The BRE guidelines suggest that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces, stating that, for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21st March. If as a result of the proposed development an existing garden or amenity area does not meet the guidance, or the area which can receive the sun is less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.

290. The potential overshadowing impacts of the proposed development has been assessed on three nearby areas:

- 2 Greystoke Place private residential rooftop terrace
- St. Dunstan's burial ground
- 98 Fetter Lane

2 Greystoke Place

291. The results of the submitted sun on ground assessments show that the private residential rooftop terrace serving the 5th floor flat currently receives 2 hours of direct sunlight on 80% of its area on 21 March.

292. With the Proposed Development in place, this terrace would experience a slight reduction, with 72% of its area continuing to receive 2 hours of direct sunlight on the 21 March. This would be a reduction of less than 20% and therefore unlikely to be noticeable in accordance with the BRE guidelines.

St. Dunstan's burial ground

293. Due to the dense urban environment surrounding St. Dunstan's burial ground, the sun on ground assessment shows that the burial ground currently receives very little direct sunlight with 100% of the area receiving less than two hours of direct sunlight on 21 March. This does not change with the proposed development and the effect is therefore negligible.

294. An assessment was also undertaken for the sun on ground on 21 June. The results for 21 June show that the burial ground can continue to enjoy good levels of sunlight during the summer months, especially during the middle parts of the day which is when it is most likely to be used. For example, 96% of the area would enjoy at least 2 hours of sunlight on 21 June.

98 Fetter Lane

295. This building is in commercial use, however there are two larger roof spaces (one on the eastern side and one on the western side) which are believed to be used as amenity spaces. It is unknown whether these spaces are used by the occupants of the building daily or whether they are only used for entertaining guests. However, for completeness, the applicant's consultants have assumed that they are used by the occupants on a daily basis, in particular during lunch time, and therefore ran overshadowing assessments.

296. The 2-hour assessments undertaken on 21 March showed that both spaces are likely to experience a notable effect from the proposed development. Currently, 67.5% of the eastern terrace and 75.3% of the western terrace receive 2 hours of sunlight on 21st March. Following the proposed development, 0% of the eastern terrace and 16.4% of the western terrace would receive 2 hours of sunlight on 21st March.

297. However, given the spaces are not in residential use, the significance of the effect can be reduced, particularly as BRE guidelines recommend focus should be on nearby residential properties as they are more reliant on natural daylight and sunlight.

298. Whilst the reductions of direct sunlight would not meet the BRE guidelines, it was noted that the spaces would still be enjoyable places to use throughout the year. For example, during the summer months of May – August, when the weather conditions are more likely to mean that the occupants would like to take their lunch outside, collectively these spaces will continue to be able to enjoy direct sunlight during the typical lunchtime hours of 12pm-2pm, with 83.8% and 85.5% of the respective terraces receiving 2 hours of sunlight on 21 June.

299. It is also worth noting that although the proposed development would reduce the amount of sunlight received on the roof terraces, the proposed development would improve the wind conditions on these terraces and therefore the thermal comfort experienced on these terraces (if they were usable) would be negligible.

Overshadowing Conclusion

300. The submitted sun on ground assessment demonstrates that the nearby residential and public opens spaces would not be adversely affected by the proposed development, and would accord with the criteria set out in the BRE Guidelines.

Daylight, Sunlight and Overshadowing Conclusion

301. The submitted reports demonstrate that any reduction in daylight or sunlight to surrounding residential properties and public or residential

opens spaces would largely be within the BRE Guidelines criteria and therefore negligible.

302. While there would be noticeable reductions in light to nine of the residential windows within 2 Greystoke Place, the dual aspect nature of the rooms those windows serve would mean that the rooms would continue to receive appropriate overall levels of light as demonstrated by the accompanying daylight distribution and ADF / radiance assessments.

303. The proposed development would be in accordance with Local Plan policy DM10.7 and draft City Plan 2036 policy DE8.

Solar Glare and Light Pollution

Solar Glare

304. Local Plan policy DM10.1 requires all developments to avoid intrusive solar glare impacts on the surrounding townscape and public realm. Draft City Plan policy DE8 requires developments to incorporate design measures to mitigate adverse solar glare effects on surrounding buildings and townscape.

305. Three key viewpoints have been identified and assessed for solar glare impacts: Fetter Lane (travelling south), Fetter Lane (travelling north-west) and Breams Buildings (travelling east).

306. The assessment results demonstrate that for all three viewpoints, either visible beyond 10° of the line of sight for limited times or experience no solar glare. The viewpoints are therefore considered to experience negligible instances of solar glare.

307. The development would be in accordance with Local Plan policy DM10.1 and City Plan 2036 policy DE8.

Light Pollution

308. Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.

309. An objection was received from a nearby commercial occupier stating that the proposed development would result in increased light pollution to the residential windows of 2 Greystoke Place.

310. The nearby residential properties at 2 Greystoke Place have been assessed for potential light trespass. Assessments have not been undertaken to 95 Fetter Lane as it is considered to be orientated away and of sufficient distance from the Site so as not to be materially affected.

311. To understand whether there is the potential for light pollution to occur, the assessment assumes that all spaces within the proposed building have the light switched on and any blinds are open (i.e. the worst-case scenario) and any other external light sources (streetlights, existing surrounding office buildings etc.) have been ignored.

312. The assessment shows that there is likely to be a material increase in the potential light pollution on the bedroom windows of 2 Greystoke Place.

313. Whilst the office would be able to be occupied 24hrs a day, it is very unlikely that the building will be fully occupied at 11pm. Mitigation measures are proposed to reduce the risk of light pollution after curfew hours. These would include an intelligent lighting system so that the lights within a space/floor of the office will automatically turn off when it is not occupied. In addition to the above, the installation of blinds to the western elevation, particularly to the areas directly opposite 2 Greystoke Place, (and with a suitable management system to ensure they are closed when the spaces are occupied post curfew hours). A condition is proposed requiring a detailed lighting strategy demonstrating the mitigation measures.

314. Subject to the recommended condition, the proposed development would comply with the Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9.

Fire Safety

315. Policy D12 of the London Plan seeks to ensure that proposals have been designed to achieve the highest standards of fire safety, embedding these into developments at the earliest possible stage. Policy D5.B.5 of the London Plan requires development proposal to be designed to 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 building.

316. The application is accompanied by a fire safety statement which demonstrates how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

317. The building fire strategy comprises complaint horizontal travel distances to the nearest exits on each level. There is an escape stair, firefighting stair, and a firefighting lift with protected lobby for safe vertical escape from all the levels. The proposed evacuation strategy considers a phased evacuation with compartment floors and associated refuges in each stair on each floor. An automatic fire detection and alarm system is proposed as well as an automatic sprinkler system. The fire service vehicle access is provided through via Fetter Lane. The building is provided with firefighting shaft extending through all the levels including basement. The firefighting shaft contains firefighting stair, firefighting lift and smoke ventilated lobby for safe firefighting operations. In addition to these a dry riser on each level is also provided in the firefighting shaft to assist with the firefighting operations.

318. This fire statement outlines the minimum fire safety provisions required for the proposed development which is to be compliant with the

Functional Requirements of the Building Regulations 2010 (as amended) and are to be developed through the design stages. The proposed development would meet the requirements of Policy D12 of the London Plan.

Health Impact Assessment

319. Policy HL9 of the Proposed Submission City Plan 2036 advises applicants of major developments to assess the potential impacts their development may have on the health and well-being of the City's communities. The applicants have submitted a Health Impact Assessment, based on the NHS Healthy Urban Development Unit's criteria and toolkit to assess the possible impacts on the health and well-being of the City's communities.

320. The proposed development was satisfactorily assessed against 41 criteria relevant to the City of London. The assessment concluded that there would be a positive impact for 29 of the criteria and a neutral impact for 9 of the criteria. The HIA identified two potential negative impacts which became neutral impacts with appropriate mitigation measures applied. The proposal does not include any affordable workspace so to mitigate this situation it was agreed that a S106 agreement would be drawn up to secure relevant employment and training initiatives. The HIA process also revealed that dust resulting from the construction process would have a negative impact. To mitigate this impact, the Construction Management Plan was checked to ensure that the impacts of dust arising from the construction process would be satisfactorily dealt with. The Construction Management Plan will be agreed by the City Corporation prior to commencement of construction.

321. One criterion became positive following mitigation during the course of the HIA process. The proposal will enable local people to access employment opportunities which was assessed as a neutral impact. It was decided that committing to using local suppliers and labour during the construction phase where possible, would increase this criterion to a positive impact.

Equality Impact

322. When considering the proposed development, the Public Sector Equality Duty (PSED) requires City of London to consider how the determination of the application will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.

323. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:-

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

- foster good relations between persons who share a relevant protected characteristic and persons who do not share it

324. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

325. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.

326. This application has been assessed against the Equality Act 2010 and any equality impacts identified.

327. The Applicants have held a range of meetings with stakeholders and the following stakeholders are considered to be relevant in the context of the Equalities Act:

    1. Fleet Quarter
    2. St. Dunstan's burial grounds
    3. Meetings with neighbouring occupiers including Weil Gotshal & Manages (London) LLP, MacFarlanes, Bird and Bird, The White Swan Public House and Owner/Occupiers of 2 Greystoke Place and email correspondence with other neighbouring occupiers who responded to consultation letters.

328. As set out in the submitted Statement of Community Involvement (SCI), stakeholder consultation has been an on-going part of the proposed development's design evolution. The stakeholder engagement sought to understand the needs of local community groups and identify opportunities for partnership and facilitation particularly in relation to part of the public benefits of the project – notably the delivery of a new publicly accessible route and new pocket square.

329. As set out earlier in the report, it is intended that the new route through and pocket park would be designed for inclusive access by all members of the community.

330. The proposed development would provide significant employment opportunities during the construction and operations phases of the development, which could benefit all groups with protected characteristics. A planning obligation for contributions towards employment and training initiatives will be secured through the Section 106 Agreement. This would provide further opportunities for priority groups.

331. The Proposed Development would offer step free access throughout and around the Site. Significant consideration has been given in the design of the scheme to ensure it is accessible and complies with Part K of the Building Regulations. All floors of the office will be served by wheelchair accessible lifts, accessible toilets and wide circulation space.

332. The design provides enhanced public realm and landscaping around the Site that will result in better connectivity through the area. The proposals provide an attractive public realm that includes new planting and a

sunken garden. The public realm is fully accessible with step free access provided.

333. The design of the scheme has been informed by Secured by Design principles and in consultation with the City of London Designing Out Crime Officer. The proposal incorporates a range of design and management measures to increase security and reduce crime experienced in the area. The public realm enhancements will also help to reduce fear of crime by users and visitors to the Site. Based on this, the Proposed Development is assessed as having a direct, permanent, minor to moderate positive impact on reducing crime for identified priority groups as well as the general population.

334. Potential impacts of the proposed development on the nearby occupiers identified above, have been assessed. Officers do not consider that they would be detrimentally impacted in so far as the spaces within the development become unusable nor would it be considered that there would be disadvantages to any persons who share a relevant protected characteristic as identified in the Equalities Act 2010.

CIL and Planning Obligations

335. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

336. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

337. From 1st April 2019 Mayoral CIL 2 (MCIL2) supersedes the Mayor of London's CIL and associated section 106 planning obligations charging schedule. This change removes the Mayors planning obligations for Crossrail contributions. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

338. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£1,231,539	£1,182,277	£49,262

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£498,825	£473,884	£21,941
City Planning Obligations			
Affordable Housing	£133,020	£131,690	£1,330
Local, Training, Skills and Job Brokerage	£19,953	£19,753	£200
Carbon Reduction Shortfall (as designed) **Not indexed**	£392,274	£392,274	£0
Section 278 (Evaluation and Design) **Not indexed**	£100,000	£100,000	£0
S106 Monitoring Charge	£3500	£0	£3,500
Total liability in accordance with the City of London's policies	**£1,147,572**	**£1,117,601**	**£29,971**

City's Planning Obligations

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

- Highway Reparation and other Highways Obligations

(incl. Highways Schedule of Condition Survey, site access, obtaining consents, licences etc)

- Local Procurement Strategy

- Local Training, Skills and Job Brokerage Strategy (*Demolition & Construction*)
- Delivery and Servicing Management Plan (*including Consolidation*)
- Travel Plan (including Cycling Promotion Plan) OR Cycling Promotion Plan
- Legible London Contribution (Ł20,000)
- Cycle Hire / Network Improvements Contribution

This contribution amount is still under negotiation between the applicant and Transport for London.

- Construction Monitoring Costs
- Carbon Offsetting
- Utility Connections
- Section 278 Agreement (*CoL*)
- Public Route and Sunken Garden (*Specification & Access*)
- Cultural Implementation Strategy
- Wind Audit
- Solar Glare

340. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.

341. The scope of the s278 agreement may include, but is not limited to, improvements to pedestrian crossing facilities at the junction of Bream's Buildings, Fetter Lane and New Fetter Lane to better facilitate east/west pedestrian movement, works to tie the new building line and new route into the public highway on Mac's Place, public highway lighting improvements, footway surrounding and within the site to be replaced with York stone, improvements to Bream's Buildings to enhance the setting of the churchyard, blue badge parking space provision, and any cycle improvements necessary to allow access to the cycle parking.

Monitoring and Administrative Costs

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

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

Site Specific Mitigation

344. The City will use CIL to mitigate the impact of development and provide the infrastructure necessary for the wider area. However, in some

circumstances, it may be necessary additionally to seek site specific mitigation to ensure that a development is acceptable in planning terms. Other matters requiring mitigation are yet to be fully scoped.

Conclusion

345. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the London Plan and the draft Local Plan and considering all other material considerations.

346. The scheme delivers a high quality, office-led development, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses.

347. The scheme makes optimal use of the site and provides an increase in office and retail floorspace in accordance with the City's objective to support a thriving economy and remain the world's leading international financial and professionals services centre.

348. The development has been designed to accommodate new ways of working reflected in flexible and adaptable floorspace to meet the demands of different types of business occupiers, including small and medium sized companies which supports post-covid recovery as identified in the 'London Recharged: Our Vision for London in 2025 report.

349. The proposal would incorporate a ground level retail unit that would enable a range of retail/restaurant/cafe uses to come forward (78sq.m (GIA), providing active frontage to the Bream's Buildings elevation, and would help enliven the new public realm between the Site and St. Dunstan's burial ground

350. The proposed building would result in a significant aesthetic enhancement to the Fetter Lane locality, through skilful modelling of the elevations, well-considered massing and the use of high-quality, innovative materials. . The proposed development would be an appropriate and sympathetic neighbour not only to the buildings immediately adjacent but also to the wider streetscape.

351. The proposed development is located within the Background Wider Setting Consultation Area of LVMF Vista 5A.2 from Greenwich Park: the General Wolfe statue to St Paul's Cathedral. However, the proposed development would be entirely obscured in the view by the existing buildings immediately to the east: No. 12 New Fetter Lane and No. 6 New Street Square, the latter of which is significantly taller than the proposed development.

352. The proposed development would be visible towards the westerly edge of this River Prospects 16B.1 and 16B.2 (Gabriel's Wharf). Although the proposed development would be visible in this view, it would be situated at such a distance from the Cathedral that it is considered that it would preserve its townscape setting. Additionally, the proposed development

would preserve the viewer's ability to read the riverside landmarks in the view.

353. The magnitude of change in these is considered negligible and the proposed development would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LMVF SPG.

354. The building would be designed to high sustainability standards, incorporating a significant element of integrated urban greening, climate resilience, targeting BREEAM 'Outstanding' and adopting Circular Economy principles and Whole Life Carbon principles.

355. The scheme delivers significant public realm enhancements including a new pedestrian route linking Mac's Place with Breams Buildings to the south, widening of Greystoke Place and a new publicly accessible pocket park adjacent to St Dunstan's burial ground.

356. In order to improve the pedestrian priority of the surrounding area a section 278 agreement will be secured which would deliver improvements to pedestrian crossing facilities at the junction of Bream's Buildings, Fetter Lane and New Fetter Lane to better facilitate east/west pedestrian movement, works to tie the new building line and new route into the public highway on Mac's Place, public highway lighting improvements, footway surrounding and within the site to be replaced with York stone, improvements to Bream's Buildings to enhance the setting of the churchyard, provision of a blue badge parking space, and any cycle improvements necessary to allow access to the cycle parking. The proposed S278 works would be in line with the visions set out in the City of London Transport Strategy and City of London's Public Realm vision.

357. The scheme benefits from high levels of public transport accessibility, would be car-free and would promote cycling and walking as healthy modes of travel. The provision of both long stay and short stay cycle spaces would exceed the requirements of the London Plan. Access for cyclists would be via two prominent cycle parking entrances at ground level off Mac's Place, or via a dedicated entrance off Fetter Lane.

358. The servicing of the building would take place on-street on Fetter Lane, which would be contrary to policy DM16.5 of the Local Plan and Policy VT2 of the draft City Plan 2036. The existing servicing is on street, therefore the servicing is proposed to remain as existing. A cap for the number of vehicles servicing the development would be no more than 14 vehicles per day which would ensure the number of vehicles proposed, is equal to or less than the estimated existing situation. The applicant was required to demonstrate how servicing could be contained within the site, to make the proposals policy compliant. However, if the servicing was contained within the site, it would not be possible to deliver the new pedestrian route through, due to space limitations of the site. Therefore,

on balance, on-street servicing is considered acceptable since it is as existing, there is a cap on the number of vehicles, and the proposals provide a public benefit in the form of a new pedestrian route.

359. The daylight and sunlight assessment demonstrates that there would be some loss of amenity in a small number of rooms within 2 Greystoke Place as a result of the proposed development. However, the most impacted rooms benefit from dual aspect, which would continue to allow acceptable levels of daylight in each room as a whole. All of the windows assessed would receive more than 0.8 times their former value and would therefore be compliant with the criteria as set out in the BRE guidelines, resulting in a negligible impact upon the sunlight received by the nearby dwellings as a result of the proposed development.

360. The submitted sun on ground assessment demonstrates that the nearby residential and public open spaces would not be adversely affected by the proposed development, and would accord with the criteria set out in the BRE Guidelines. The overshadowing assessment of 95 Fetter Lane (commercial) undertaken on 21 March showed that the eastern and western side roof terraces are likely to experience a noticeable effect from the proposed development. Currently, 67.5% of the eastern terrace and 75.3% of the western terrace receive 2 hours of sunlight on 21st March. Following the proposed development, 0% of the eastern terrace and 16.4% of the western terrace would receive 2 hours of sunlight on 21st March. However, given the spaces are in commercial use, the significance of the effect can be reduced, particularly as BRE guidelines recommend focus should be on nearby residential properties as they are more reliant on natural daylight and sunlight. However, given the spaces are not in residential use, the significance of the effect can be reduced, particularly as BRE guidelines recommend focus should be on nearby residential properties as they are more reliant on natural daylight and sunlight.

361. An objection was received stating that the proposed development would overshadow the nearby 12 New Fetter Lane resulting in a loss of daylight and sunlight to the offices therein, leading to a need for additional artificial lighting and an inferior working environment. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended. The report assesses the proposals against Strategic Policy CS10 which seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises such as offices are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises it is not considered to be such as to have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended

occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in these respects.

362. Negative impacts during construction would be controlled as far as possible by the implementation of a robust Construction Environmental Management Plan and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions and S106 obligations would minimise any adverse impacts.

363. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

364. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

365. Additional material considerations are as follows:

- Securing a development within the City, that would provide land uses which support the diversification, vitality and growth of the City as a world class business destination
- Increase in a diverse retail provision on the site, enhancing the retail offer in, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active street frontages.
- Provision of high-quality public realm at ground floor and optimising pedestrian movement by maximising permeability, providing access to external and internal pedestrian routes which are inclusive, comfortable and attractive thereby enhancing the City's characteristic network of accessible buildings, streets, courts and alleys.
- Securing a development that is environmentally responsible in that it would seek to promote active travel, urban greening, target BREEAM 'outstanding', reduce carbon emissions, and reduce waste.
- The proposed building would result in a significant aesthetic enhancement to the Fetter Lane locality, through the use of high-quality faience materials to the new public house elevation and detailing inspired by its immediate neighbours, the proposed building would be an appropriate and sympathetic neighbour in architectural terms.

366. It is for the LPA to weigh the other material considerations and decide whether those that support the development outweigh the priority statute has given to the development plan.

367. When taking all matters into consideration, subject to the recommendations of this report it is recommended that planning permission be granted.

Background Papers

Application Documents

Design and Access Statement, Fletcher Priest Architects, May 2021
Planning Statement, DP9, May 2021
Accommodation Schedule, Fletcher Priest Architects, August 2021
Statement of Community Involvement; DP9/YardNine, May 2021
Energy Strategy Report; Waterman, May 2021
Smart Infrastructure and Utilities Services Report, Waterman, May 2021
Ecological Impact Assessment, Waterman, May 2021
Biodiversity Net Gain Assessment, Waterman, May 2021
Preliminary Environmental Risk Assessment, Waterman, May 2021
Health Impact Assessment, Iceni Projects Ltd, May 2021
Equalities Statement, Iceni Projects Ltd, May 2021
Acoustic Report, Waterman, May 2021
Air Quality Assessment (and Air Quality Neutral Assessment), Waterman, May 2021
Daylight, Sunlight and Overshadowing Report, Point 2, May 2021
Solar Glare and Light Pollution Report, Point 2, May 2021
Wind Microclimate Assessment, RWDI, May 2021
Outdoor Thermal Comfort Assessment, RWDI, May 2021
Outline Construction Environmental Management Plan including Construction Logistics Plan, Waterman, May 2021
Healthy Streets Transport Assessment, Waterman, May 2021
Framework Travel Plan, Waterman, May 2021
Framework Delivery and Servicing Plan, Waterman, May 2021
Operational Waste Management Strategy, Waterman, May 2021
Flood Risk Assessment, Foul Water Drainage and SUDs Strategy, Waterman, May 2021
Arboricultural Impact Assessment, prepared by Waterman, May 2021
Public House Comparison, Fletcher Priest Architects, July 2021
Archaeological Desk Based Assessment, Waterman, July 2021
Radiance Based Daylight Assessment, Point 2, July 2021
Fire Safety Statement, Sweco UK Ltd, August 2021
Sustainability Statement & BREEAM Pre-Assessment, Waterman, August 2021
Whole Life Carbon Assessment and Circular Economy Statement, Waterman, August 2021
Response to Access Comments, Fletcher Priest Architects, 11/08/2021

Response to TfL Comments, Waterman, 16/08/2021
Existing Plans: FLN-FPA-XX-B1-DR-A-10001, FLN-FPA-XX-GF-DR-A-10002, FLN-FPA-XX-01-DR-A-10003, FLN-FPA-XX-02-DR-A-10004, FLN-FPA-XX-03-DR-A-10005, FLN-FPA-XX-04-DR-A-10006, FLN-FPA-XX-05-DR-A-10007, FLN-FPA-XX-06-DR-A-10008, FLN-FPA-XX-07-DR-A-10009, FLN-FPA-XX-RF-DR-A-10010, FLN-FPA-XX-ZZ-DR-A-11001, FLN-FPA-XX-ZZ-DR-A-11002, FLN-FPA-XX-ZZ-DR-A-11003, FLN-FPA-XX-ZZ-DR-A-11004, FLN-FPA-XX-ZZ-DR-A-12001.

External

Letter Historic England 02/07/2021

Letter Tower Hamlets 21/07/2021

Letter Bird and Bird Ltd. 26/07/2021 [Objection]

Letter Southwark 30/07/2021

Letter Greenwich 30/07/2021

Letter Greater London Authority 10/08/2021

Emails DP9 21/07/2021, 27/07/2021

Internal

Email City of London Police 29/06/2021

Memo Lead Local Flood Authority 01/07/2021

Memo Department of Markets and Consumer Protection 09/07/2021

Memo Air Quality Officer 09/07/2021

Memo Access Team 15/07/2021

Memo Contract and Drainage Service 16/07/2021

Memo District Surveyors Office 19/08/2021

Email Cleansing Team 19/08/2021

Appendix B

Relevant London Plan Policies

Policy CG1 Building Strong and Inclusive Communities

Policy GG2 Making the best use of land

Policy CG3 Creating a Healthy City

Policy GG5 Growing a good economy

Policy CG6 Increasing efficiency and resilience

Policy SD4 The Central Activities Zone (CAZ)

Policy SD5 Offices, and other strategic functions and residential development in the CAZ

Policy D1 London's form, character and capacity for growth

Policy D2 Infrastructure requirements for sustainable densities

Policy D3 Optimising site capacity through the design-led approach

Policy D4 Delivering Good Design

Policy D5 Inclusive Design

Policy D8 Public realm

Policy D11 Safety, security and resilience to emergency

Policy D12 Fire Safety

Policy D14 Noise

Policy E1 Offices

Policy E2 Providing suitable business space

Policy E9 Retail, markets and hot food takeaways

Policy E10 Visitor infrastructure

Policy HC1 Heritage conservation and growth

Policy HC3 Strategic and Local Views

Policy HC4 London View Management Framework

Policy HC5 Supporting London's culture and creative industries

Policy G5 Urban Greening

Policy G6 Biodiversity and access to nature

Policy G7 Trees and woodlands

Policy SI1 Improving air quality

Policy SI2 Minimising greenhouse gas emissions

Policy SI4 Managing heat risk

Policy SI5 Water Infrastructure

Policy SI7 Reducing waste and supporting the circular economy

Policy SI8 Waste capacity and net waste self-sufficiency

Policy SL13 Sustainable drainage

Policy T1 Strategic approach to transport

Policy T2 Healthy Streets

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6 Car Parking

Policy T7 Deliveries, servicing and construction

Policy T9 Funding transport infrastructure through planning

Relevant GLA Supplementary Planning Guidance (SPG):

Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014)

Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014)

Sustainable Design and Construction (GLA, September 2014)

Social Infrastructure (GLA May 2015)

London Environment Strategy (GLA, May 2018)

London View Management Framework SPG (GLA, March 2012)

Cultural Strategy (GLA, 2018)

Mayoral CIL 2 Charging Schedule (April 2019)

Central Activities Zone (GLA March 2016)

Shaping Neighbourhoods: Character and Context (GLA June 2014)

Town Centres SPG (July 2014)

Mayor's Transport Strategy (2018)

Culture 2016 strategy.

Relevant Draft City Plan 2036 Policies

AT1 Pedestrian movement

AT2 Active travel including cycling

AT3 Cycle parking

CE1 Zero Waste City

CR1 Overheating and Urban Heat Island effect

CR3 Sustainable drainage systems (SuDS)

CV1 Protection of existing visitor, art and cultural facilities

CV5 Public Art

DE1 Sustainability requirements

DE2 New development
DE3 Public realm
DE5 Terraces and viewing galleries
DE6 Shopfronts
DE8 Daylight and sunlight
DE9 Lighting
HE1 Managing change to heritage assets
HE2 Ancient monuments and archaeology
HL1 Inclusive buildings and spaces
HL2 Air quality
HL3 Noise and light pollution
HL4 Contaminated land and water quality
HL9 Health Impact Assessments
HS3 Residential environment
OF1 Office development
OS1 Protection and Provision of Open Spaces
OS2 City greening
OS3 Biodiversity
OS4 Trees
S1 Healthy and inclusive city
S2 Safe and Secure City
S4 Offices
S5 Retailing
S6 Culture, Visitors and the Night -time Economy
S7 Smart Infrastructure and Utilities
S8 Design
S9 Vehicular transport and servicing
S10 Active travel and healthy streets
S11 Historic environment
S12 Tall Buildings
S13 Protected Views
S14 Open spaces and green infrastructure
S15 Climate resilience and flood risk
S16 Circular economy and waste
S27 Planning contributions

SA1 Crowded places

SA3 Designing in security

VT1 The impacts of development on transport

VT2 Freight and servicing

VT3 Vehicle Parking

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

Air Quality SPD (CoL, July 2017)

Archaeology and Development Guidance SPD (CoL, July 2017)

City Lighting Strategy (CoL, October 2018)

City Transport Strategy (CoL, May 2019)

City Waste Strategy 2013-2020 (CoL, January 2014)

Protected Views SPD (CoL, January 2012)

City of London's Wind Microclimate Guidelines (CoL, 2019)

City of London Thermal Comfort Guidelines (CoL 2020)

Planning Obligations SPD (CoL, July 2014)

Open Space Strategy (COL 2016)

Office Use SPD (CoL 2015)

City Public Realm (CoL 2016)

Cultural Strategy 2018 – 2022 (CoL 2020)

Relevant Conservation Area Summaries

Relevant Local Plan Policies

DM19.1 Additional open space

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

2. New open space should:

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

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

DM19.2 Biodiversity and urban greening

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

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

CS20 Improve retail facilities

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

DM20.3 Retail uses elsewhere

To resist the loss of isolated and small groups of retail units outside the PSCs and Retail Links that form an active retail frontage, particularly A1 units near residential areas, unless it is demonstrated that they are no longer needed.

DM20.4 Retail unit sizes

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.

2. Major retail units (over 1,000sq.m) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

DM21.3 Residential environment

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

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

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

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

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

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

CS1 Provide additional offices

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

DM1.2 Protection of large office sites

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

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

DM1.3 Small and medium business units

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

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

DM1.5 Mixed uses in commercial areas

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

DM3.2 Security measures

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

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

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

DM3.5 Night-time entertainment

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

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

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

CS4 Seek planning contributions

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

CS10 Promote high quality environment

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

DM10.1 New development

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

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

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

DM10.2 Design of green roofs and walls

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

2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

1) To encourage high quality roof gardens and terraces where they do not:

a) immediately overlook residential premises;
b) adversely affect rooflines or roof profiles;
c) result in the loss of historic or locally distinctive roof forms, features or coverings;
d) impact on identified views.

2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

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

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

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

DM10.5 Shopfronts

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

a) respect the quality and architectural contribution of any existing shopfront;
b) respect the relationship between the shopfront, the building and its context;
c) use high quality and sympathetic materials;
d) include signage only in appropriate locations and in proportion to the shopfront;
e) consider the impact of the installation of louvres, plant and access to refuse storage;
f) incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
g) not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;

h) resist external shutters and consider other measures required for security;
i) consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
j) be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

DM10.7 Daylight and sunlight

1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

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

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

CS11 Encourage art, heritage and culture

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

DM11.2 Public Art

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

a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
b) ensuring that financial provision is made for the future maintenance of new public art;

c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

CS12 Conserve or enhance heritage assets

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

DM12.1 Change affecting heritage assets

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

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

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

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

DM12.4 Archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.

2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.

3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

DM12.5 Historic parks and gardens

1. To resist development which would adversely affect gardens of special historic interest included on the English Heritage register.

2. To protect gardens and open spaces which make a positive contribution to the historic character of the City.

CS13 Protect/enhance significant views

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

CS14 Tall buildings in suitable places

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

CS15 Creation of sustainable development

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

DM15.1 Sustainability requirements

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

2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:

a) BREEAM or Code for Sustainable Homes pre-assessment;
b) an energy statement in line with London Plan requirements;
c) demonstration of climate change resilience measures.

3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

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

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

DM15.2 Energy and CO2 emissions

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

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

a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

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

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

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

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

DM15.4 Offsetting carbon emissions

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

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

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

DM15.5 Climate change resilience

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

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

DM15.6 Air quality

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

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

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

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

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

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

DM15.7 Noise and light pollution

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

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

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

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

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

DM15.8 Contaminated land

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport

implications during both construction and operation, in particular addressing impacts on:

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

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

DM16.2 Pedestrian movement

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

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

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

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

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

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

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

DM16.3 Cycle parking

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

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

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.

2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.

2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.

4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.

2. On-site waste management, through techniques such as recyclate sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

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

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

CS18 Minimise flood risk

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

DM18.2 Sustainable drainage systems

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

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and

other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

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

CS19 Improve open space and biodiversity

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

SCHEDULE

APPLICATION: **21/00534/FULMAJ**

100 And 108 Fetter Lane London EC4A 1ES

Demolition of 100 Fetter Lane and construction of a new building for office use (Class E) and a flexible commercial unit (Class E(a)(b)(c)(d)), comprising a basement level, ground, mezzanine and 12 upper storeys plus roof plant level, creation of a new pedestrian route and pocket square at ground level, ancillary cycle parking, servicing, plant and enabling works.

[For the avoidance of doubt this application relates to 'Option B' as set out in the application documents. A separate application for 'Option A' is under consideration and is the subject of separate consultation and assessment].

CONDITIONS

1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.

2 Prior to the commencement of the development a detailed Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority, providing final details on how the building would adhere to circular economy principles: build in layers, design out waste, design for longevity, design for flexibility and adaptability, design for disassembly and using systems, elements or materials that can be re-used and recycled, to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details.
REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plan and draft Development Plan: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction starts.

3 Prior to any stripping-out or demolition of the existing building, a material audit of the building should be submitted to and approved in writing by the Local Planning Authority to understand the value of it as a material bank, establishing what can be retained and what can be

reused either on-site, in the first instance, re-used off-site or recycled, with the presumption that as little waste as possible is generated and the development shall be carried out in accordance with the approved details.
REASON : To ensure that the Local Planning Authority can be satisfied that the proposed development will be designed to promote circular economy principles to reduce waste and encourage recycling, reducing impact on virgin resources in accordance with the following policies in the Development Plan and the draft Development Plan: London Plan ; GG5, GG6, D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1.These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction start.

4 Prior to the commencement of the development a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the Whole Life Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's aspirational benchmarks set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life cycle of the development.
REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: Publication London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM15.2, DM 17.2 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

5 Prior to the commencement of any works on site, details shall be submitted to and approved in writing by the Local Planning Authority showing the means of protection of the trees within St. Dunstan-in-the-West burial ground including their root system and the approved details shall be implemented prior to and during the course of the building works as appropriate.
REASON: To ensure the protection of the adjacent trees in accordance with the following policies of the Local Plan: DM10.4, DM19.2. These details are required prior to commencement in order that any changes

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

6 The demolition shall not be carried out other than in accordance with the Demolition Environmental Management Plan and the Construction Logistics Plan by Waterman dated August 2021 hereby approved.
REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

7 Prior to the commencement of demolition the developer/demolition contractor shall sign up to the Non-Road Mobile Machinery Register. The demolition shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.
REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

8 Prior to the commencement of construction the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The construction shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.
REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

9 Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the

potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.
REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

10 There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).
REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

11 Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. No demolition or construction shall be

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

12 No works except demolition to basement slab level shall take place until arrangements have been made for an archaeological "watching brief" to monitor development groundworks and to record any archaeological evidence revealed. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. Details of these arrangements shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the work.
REASON: To ensure an opportunity is provided for the archaeology of the site to be investigated and recorded in accordance with the following policy of the Local Plan: DM12.4.

13 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.
Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.
Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.
REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

14 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: green roofs, blue roofs, rain gardens, attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 1.3 l/s from the proposed outfall and provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 132m3.
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of construction work.
(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.
REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

15 No development other than demolition shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.
REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

16 The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun and the development shall not be carried out otherwise than in accordance with the approved details.
REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition

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

17 Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036.

18 Before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details, unless otherwise approved in writing by the local planning authority.
REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.

19 Details of the position and size of the green roof(s)/wall(s), the type of planting and the contribution of the green roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

20 Details of the construction, planting irrigation and maintenance regime for the proposed green wall(s)/roof(s) shall be submitted to and approved in writing by the local planning authority before any works

thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

21 All unbuilt surfaces shall be treated in accordance with a landscaping scheme to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. The scheme shall include details of the design of the pocket park, pedestrian routes, and terraces. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within 5 years of completion of the development shall be replaced with trees and shrubs of similar size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.
REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

22 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;
(b) details of the proposed new facade(s) and flank wall(s) including the treatment of the jewel building and Greystoke Place elevation including typical details of the fenestration and entrances;
(c) details of the embossing, stamping and decorative elements of the development;
(d) details of ground floor elevations;
(e) details of the ground floor office entrance(s);
(f) details of windows and external joinery;
(g) details of all soffits, hand rails and balustrades;
(h) details of the proposed external terraces (including balustrades and handrails);
(i) details of junctions with adjoining premises including the St. Dunstan in the West Burial Ground and the retained White Swan Public House;;

(j) details of the integration of window cleaning equipment and the garaging thereof, plant, plant enclosures, flues, fire escapes and other excrescences at roof level;
(k) details of ventilation and air-conditioning;

(l) details of all ground level surfaces including materials to be used;

(m) details of the proposed public route through the development including of the proposed gates, the proposed planting layout, the proposed seating, the proposed landscaping and the proposed elevations and soffits; and
(o) details of repairs and external refurbishment of the retained White Swan public house.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM10.5, DM10.8, CS19 and policy T6 of the London Plan.

23 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) A Lifetime Maintenance Plan for the SuDS system to include:
- A full description of how the system would work, it's aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;
- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.
REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

24 Once the building construction is completed and prior to the development being occupied (or, if earlier, prior to the development being handed over to a new owner or proposed occupier) a post-completion Circular Economy report shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.
REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the Publication London Plan.

25 A post construction full fit out BREEAM assessment for the new office building demonstrating that a target rating of 'Outstanding' has been achieved (or, if first agreed by the local planning authority a minimum rating of 'Excellent' has been achieved) shall be submitted as soon as practicable after practical completion. In the event that the local planning authority is asked to agree a minimum rating of "Excellent" it must be first demonstrated to the satisfaction of the local planning

authority that all reasonable endeavours have been used to achieve an "Outstanding' rating. The details shall thereafter be retained.
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

26 Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority and the GLA at: ZeroCarbonPlanning@london.gov.uk. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.
REASON: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the Publication London Plan.

27 Within 6 months of completion details must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.
REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

28 The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.
A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall submitted to and approved in writing by the Local Planning Authority.
REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

29 Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the

finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.
REASON: REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.

30 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.
(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.
REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

31 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 204 long stand and 28 short stay pedal cycle spaces. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.

32 A minimum of 5% of the long stay cycle spaces shall be accessible for adapted cycles.
REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy T5 cycling B, emerging City Plan policy 6.3.24.

33 Changing facilities and showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building

for the use of occupiers of the building in accordance with the approved plans.
REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.

34 The threshold of the new pedestrian route shall be at the same level as the rear of the adjoining footway.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.

35 The roof terraces hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 07:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

36 No amplified or other music shall be played on the roof terraces.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

37 No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.

38 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.

39 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety

40 The area within the development marked as cafe or flexible commercial unit on the floorplans at ground level hereby approved, shall be used for retail purposes within Class E (shop, financial and professional services and cafe or restaurant) and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country

Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020)) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.3.

41 The development shall provide:
- 14,428sq.m (GEA) of office floorspace (Class E);
- 244sq.m(GEA) Flexible Commercial Floorspace (Class E); and
-68sq.m (GEA) flexible retail, restaurant, cafe floorspace (Class E).
REASON: To ensure the development is carried out in accordance with the approved plans.

42 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: FLN-FPA-XX-XX-DR-A-01001 Rev P01; FLN-FPA-XX-B1-DR-A-20102 Rev P03; FLN-FPA-XX-GF-DR-A-20103 Rev P06; FLN-FPA-XX-M1-DR-A-20104 Rev P05; FLN-FPA-XX-ZZ-DR-A-20105 Rev P04; FLN-FPA-XX-04-DR-A-20106 Rev P04; FLN-FPA-XX-05-DR-A-20107 1 Rev P04; FLN-FPA-XX-06-DR-A-20108 Rev P04; FLN-FPA-XX-07-DR-A-20109 Rev P05; FLN-FPA-XX-08-DR-A-20110 Rev P05; FLN-FPA-XX-09-DR-A-20111 Rev P04; FLN-FPA-XX-10-DR-A-20112 Rev P04; FLN-FPA-XX-11-DR-A-20113 Rev P04; FLN-FPA-XX-12-DR-A-20114 Rev P04; FLN-FPA-XX-12-DR-A-20115 Rev P04; FLN-FPA-XX-RF-DR-A-20116 Rev P02; FLN-FPA-XX-ZZ-DR-A-21101 Rev P01; FLN-FPA-XX-ZZ-DR-A-21102 Rev P02; FLN-FPA-XX-ZZ-DR-A-21103 Rev P01; FLN-FPA-XX-ZZ-DR-A-21104 Rev P02; FLN-FPA-XX-ZZ-DR-A-22101 Rev P01; Demolition Environmental Management Plan by Waterman dated May 2021; Construction Logistics Plan by Waterman dated August 2021.
REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.