

<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	26 October 2021
<b>Subject:</b> 120 Fleet Street London EC4A 2BE Demolition of the existing River Court building at 120 Fleet Street, including part demolition of the basement and the erection of a new building comprising two basement levels and ground floor plus 20 upper storeys (93.15m AOD) including retail, commercial, office and service use (Class E). Creation of new pedestrian routes. Change of use of Daily Express Building from office (Use Class E) to learning and non-residential institutions use (Class F1), retail, flexible learning and non-residential institutions and commercial use (Class E), Alterations to and refurbishment of the existing Grade II* listed Daily Express Building at 120 Fleet Street, including works to detach the building from the River Court with demolition of part of linking floorplate and structure from basement level 01 to level 06, demolition of roof and installation of new roof with associated roof garden, erection of new north facade, retention of south-east curved corner and part demolition of existing east facade from ground level to level 05, erection of new facade and shopfront and associated works.	<b>Public</b>
<b>Ward:</b> Castle Baynard	<b>For Decision</b>
<b>Registered No:</b> 21/00538/FULEIA	<b>Registered on:</b> 21 June 2021
<b>Conservation Area:</b> Fleet Street	<b>Listed Building:</b> No

### Summary

For information: this report includes an application for planning permission (21/00538/FULEIA) and an application for Listed Building Consent (21/00524/LBC). See the separate report for recommendations and conditions in respect of the Listed Building Consent application.

Planning permission is sought for: Demolition of the existing River Court building at 120 Fleet Street, including part demolition of the basement and the erection of a new building comprising two basement levels and ground floor

plus 20 upper storeys (93.15m AOD) including retail, commercial, office and service use (Class E). Creation of new pedestrian routes. Change of use of Daily Express Building from office (Use Class E) to learning and non-residential institutions use (Class F1), retail, flexible learning and non-residential institutions and commercial use (Class E), Alterations to and refurbishment of the existing Grade II\* listed Daily Express Building at 120 Fleet Street, including works to detach the building from the River Court with demolition of part of linking floorplate and structure from basement level 01 to level 06, demolition of roof and installation of new roof with associated roof garden, erection of new north facade, retention of south-east curved corner and part demolition of existing east facade from ground level to level 05, erection of new facade and shopfront and associated works.

Listed building consent is sought for: Alterations to and refurbishment of the existing Grade II\* listed Daily Express Building at 120 Fleet Street, including works to detach the building from the River Court with demolition of part of linking floorplate and structure from basement level 01 to level 06, demolition of roof and installation of new roof with associated roof garden, erection of new north facade, retention of south-east curved corner and part demolition of existing east facade from ground level to level 05, erection of new facade and shopfront, demolition of level 06 landing and extension to existing oval staircase to provide access to new roof with new core on north side incorporating new lift between roof top level and basement level 01, installation of new staircase between rooftop level and basement level 02, demolition of mezzanine at basement level 01, removal of internal partitions and associated works.

The proposed development is for an office-led scheme comprising ground and 20 upper storeys which includes demolition of the existing building comprising Rivercourt building at 120 Fleet Street, including part demolition of the basement and construction of a new building arranged over two basement levels, ground floor plus 20 upper storeys comprising commercial, business and service use (Class E), alterations to and refurbishment of the existing Grade II\* listed Daily Express building at 120 Fleet Street which include works to physically detach the building from the River Court building, creation of publicly accessible roof garden and change of use and public realm and highway works including the creation of new pedestrian routes through the site at ground floor level.

The gross floor area would be 78,456sq.m GIA comprising:

2,368sq.m Commercial, Business and Service Use (Class E)  
2,051sq.m Retail Use (Class E (a), (b) and (c))  
61,135sq.m Office Use (Class E)  
1,331sq.m Learning and non-residential institutions Use (Class F1)  
429sq.m Flexible learning and non-residential institutions use / retail purposes / bar (Use Classes F1/E (a), (b), (c) and Sui Generis)  
2,776sq.m Flexible learning and non-residential institutions use / commercial, business and service use (Classes F1/E)  
8,366sq.m Plant, BOH and Storage

An Environmental Statement accompanies the scheme.

The scheme delivers a high quality, commercial building within the City, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses. The scheme features a number of attractive features including greening, new roof terraces, cycle house parking facilities and new routes. It provides a significant increase in office and retail floorspace meeting primary objectives of the City's Local Plan and London Plan policies. Strategic Policy CS1 of the City of London Local Plan 2015, emerging Policy S4 and policy 4.2 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers.

The buildings would be designed to high sustainability standards, exceeding GLA and Local Plan policies in terms of operational and embodied carbon emission reduction and targeting a BREEAM rating of "Outstanding" for the new building.

The development includes a well-considered and innovative approach to integrating green infrastructure and urban greening both within the public realm and on all the building's terraces, significantly increasing the biodiversity on site that would contribute to improvements of the wider area.

The scheme delivers significant public realm enhancements, including generously proportioned accessible new east-west public routes through the site, connecting Shoe Lane with St Bride.

Objections have been received from Historic England, Twentieth Century Society, City of London Conservation Area Advisory Committee and London and Middlesex Archaeological Society (LAMAS).

23 Letters of objection have been received from local residents, objecting on the grounds of heritage, bulk and massing, loss of daylight and sunlight, noise and other various issues detailed in the consultation section of this report.

A letter of support has been received from Landsec.

Objections have been received from statutory consultees and third parties, relating to the design of the development; its impact on designated and non-designated heritage assets; the impact on the environment and amenity of the immediately surrounding area and buildings. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and the S106 Agreement.

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

There are a small number of major and moderate adverse impacts, on flats at 5 & 6 Poppins Court. Where there are moderate or major adverse impacts, retained levels of VSC and NSL are appropriate to the local context. As such the extent of harm is not considered to be such that it would conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. When considered against the wider benefits of the scheme, including the significant public benefits and new routes through the site, these impacts are considered to be acceptable.

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

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

It is almost always the case that where major development proposals come forward in the City there is at least some degree of non-compliance with planning policies. In arriving at a decision, it is necessary to have regard to all the policies in the development plan and to come to a view as to whether in

the light of the whole plan the proposal does or does not accord with it. The heritage policies in the London Plan (in particular HC1) and in the Local Plan (in particular CS12) do not incorporate a balancing exercise as found in paragraph 202 of the NPPF. As a result, if a proposal results in any harm to the significance of a heritage asset it will result in conflict with the heritage policies. The application proposals conflict with London Plan policy HC1 and with Local Plan policies CS12, and DM12.1. Whilst in this case, the proposals are in compliance with a number of policies, conflict has also been identified with a number of other development plan policies as outlined above in this conclusion. It is the view of officers that taken as whole the proposal does not comply with the development plan as a whole.

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

Paragraph 10 of the NPPF sets out that there is a presumption in favour of sustainable development.

As set out in paragraph 199 of the NPPF, great weight should be given to the designated heritage asset's conservation, and at paragraph 200, that any harm should require clear and convincing justification. The weight to be given to a designated heritage assets conservation should increase with its importance.

The NPPF, paragraph 202, requires that harm be balanced against the public benefits. The paragraph 202 NPPF balancing exercise is also to be applied when considering the harm to non-designated heritage assets, designated heritage assets and impacts on the Fleet Conservation Area and processional routes within St Paul's Conservation Area. That balancing exercise is set out in the body of this report. It is the view of officers that giving great weight to the conservation of heritage assets, and considerable importance and weight to the desirability of preserving the setting of listed buildings and to the desirability of preserving or enhancing the character or appearance of the conservation areas, the identified harm to the significance of the designated heritage assets is outweighed by the public interest benefits associated with the proposed development. That is the case whether harm to the significance of the designated heritage assets affected is considered cumulatively or on an

asset by asset basis.

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

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

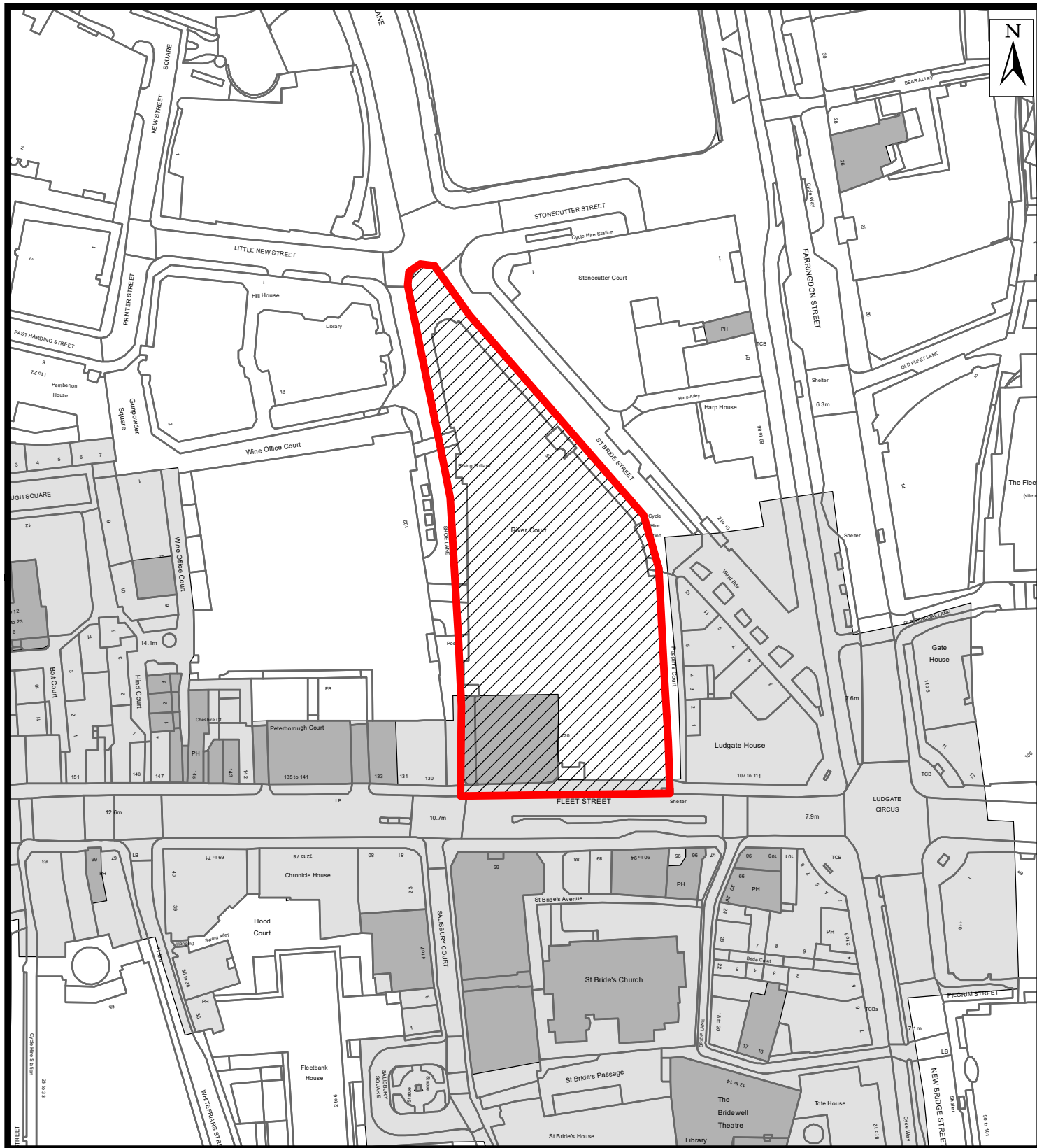
Taking all material matters into consideration, officers are of the view that the material considerations which weigh in favour of the grant of planning permission outweigh the identified conflict with the development plan and other material considerations which weigh against the grant of planning permission. Benefits include: Rejuvenation of the Grade II\* Daily Express Building as a publicly accessible cultural destination, with complementary uses and a landscaped public roof garden, an improved public realm including new pedestrian routes through the site and increased pavement widening on Fleet Street which improves pedestrian movement and comfort, increased active ground floor frontages providing flexible retail, promotion of active travel through the delivery of a prominently located Cycle House, contributions towards further public realm improvement works to St Bride Street secured through the S278 agreement, use of off-site consolidation centres to minimise vehicle movements, delivery of a Cultural Implementation Strategy which would provide details on how further consultation and delivery plans would be adopted which is secured via a S106 agreement, delivery of an exemplar new office building demonstrating high sustainability credentials, high standards of architecture and design which provides high quality internal and external environments which embed health and wellbeing through the provision of unique south facing landscaped external amenity terraces for office occupiers.

The proposed development represents sustainable development. Applying the approach in section 38(6) of the Planning and Compulsory Purchase Act 2004, Officers recommend that planning permission should be granted for the proposed development subject to all the relevant conditions being applied.

## **Recommendation**

1. That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:
  - (a) The application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008);
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 agreement under Section 278 of the Highway Act 1980.
3. That the accompanying application for listed building consent is granted (Reference: 21/00524/LBC).
4. That your Officers be authorised to provide the information required by regulations 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

# Site Location Plan



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ADDRESS:  
120 Fleet Street

CASE No.  
21/00538/FULEIA



**SITE LOCATION**



**LISTED BUILDINGS**



**CONSERVATION AREA BOUNDARY**



**CITY OF LONDON BOUNDARY**



**ENVIRONMENT DEPARTMENT**





Image 1: View of existing listed Daily Express Building and Rivercourt southern elevation's, fronting Fleet Street



Image 2: View looking south from St Bride Street, with the existing Rivercourt building on the right





Image 3: View looking south from halfway down St Bride Street With the existing River Court building and Poppins Court on the right and Ludgate Circus in the distance



Image 4: View looking south from Shoe Lane, with the Listed Daily Express building to the left and Fleet Street in the distance



Image 5: Shoe Lane looking south

## **Main Report**

### **Environmental Statement**

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

## **Site and surroundings**

### **The Site**

7. The site lies on the north side of Fleet Street, located between St Bride Street and Shoe Lane. The site is bounded by Fleet Street to the south, Shoe Lane to the west, St Bride Street to the east and the junction of Shoe Lane, St Bride Street, Stonecutter Street and Little New Street to the north.
8. The site comprises of two adjoining buildings, The Grade II\* Listed Daily Express Building and Rivercourt. The Daily Express building is located in the Fleet Street Conservation Area.
9. The site is located within the London Central Activities Zone (CAZ).
10. Fleet Street is designated as a Principal Shopping Centre (PSC) in the Local Plan and a District Centre in the London Plan.
11. The northern half of the site is located within the Background Wider Setting Consultation Area for the London View Management Framework Protected Vista 5A.2 from Greenwich Park to St Paul's Cathedral, which cuts diagonally across the site.
12. Fleet Street is designated as a Local Distributor Road and a Strategic Cycle Route in the Local Plan.

### **Existing Buildings**

13. The site is currently occupied by two adjoining buildings, one of which is listed.

#### ***The Daily Express Building***

14. The Daily Express Building is a Grade II\* Listed Building, constructed in 1932. The building is located on the south west side of Rivercourt, which wraps around the building.
15. The building has undergone various alterations since its original construction. The Daily Express were one of the last newspapers to leave Fleet Street in 1989, a subsequent failed redevelopment project left the building that previously joined the Daily Express Building to the north and east demolished and the Daily Express Building's concrete frame exposed for a number of years. The site was redeveloped in 2000 which included attaching the north and eastern sides of the Daily Express Building to the newly constructed Rivercourt Building. The building was occupied in their entirety as offices by Goldman Sachs, who vacated in March 2020.

#### ***Rivercourt***

16. Rivercourt was constructed in 2000. The building wraps around the listed Daily Express buildings north and east facades and narrows to the north where it fronts the junction of Shoe Lane and St Bride Street. It is a commercial building set across two basement levels, ground,

upper ground and nine upper floors. There is a retail unit at ground floor level fronting Fleet Street and the remainder of the entire Rivercourt building is in office use, having recently been vacated by Goldman Sachs.

### Surrounding Area

17. The area is identified in the London Plan as a specialised economic cluster within the Central Activities Zone (CAZ) with a strong legal character.
18. The predominant land use around the site is office accommodation with ground floor retail uses along Fleet Street, and a limited amount of residential uses. In the immediate vicinity of the site, to the south is Fleet Street, a royal and state ancient processional route that links the Palace of Westminster to St Paul's Cathedral. Fleet Street is a Conservation Area lined with a series of medium rise commercial buildings, several of which are Grade II listed. To the south of Fleet Street is Bride Lane, which contains residential units. 100m to the south of the development site lies the Salisbury Square City of London Police Headquarters and Courts scheme. To the east of the site is predominantly medium rise buildings including Ludgate House as well as residential units along Poppins Court. To the west of the site lies Peterborough Court, a Grade II listed 1920's office building. To the north and west of Peterborough Court are residential units within Wine Office Court.
19. St Paul's Cathedral (grade I) is located approximately 400m to the east of the site.
20. There are a number of listed buildings in relatively close proximity to the site, including:
  - 82 – 85 Fleet Street (Grade II);
  - 90 – 94 Fleet Street (Grade II);
  - The Old Bell Public House (Grade II);
  - The Punch Tavern and offices above (Grade II);
  - 2 – 7 Salisbury Court (Grade II);
  - Mersey House (Grade II);
  - The Daily Telegraph Building (Grade II);
  - St Bride's Church (Grade I); and
  - St Paul's Cathedral (Grade I).

### Proposals

21. Planning permission is sought for (application reference 21/00538/FULEIA):

Demolition of the existing River Court building at 120 Fleet Street, including part demolition of the basement and the erection of a new building comprising two basement levels and ground floor plus 20 upper storeys (93.15m AOD) including retail, commercial, office and service use (Class E). Creation of new pedestrian routes.

Change of use of Daily Express Building from office (Use Class E) to learning and non-residential institutions use (Class F1), retail, flexible learning and non-residential institutions and commercial use (Class E), Alterations to and refurbishment of the existing Grade II\* listed Daily Express Building at 120 Fleet Street, including works to detach the building from the River Court with demolition of part of linking floorplate and structure from basement level 01 to level 06, demolition of roof and installation of new roof with associated roof garden, erection of new north facade, retention of south-east curved corner and part demolition of existing east facade from ground level to level 05, erection of new facade and shopfront and associated works.

22. Listed building consent is sought for the following works to 120 Fleet Street (application reference 21/00524/LBC):

Alterations to and refurbishment of the existing Grade II\* listed Daily Express Building at 120 Fleet Street, including works to detach the building from the River Court with demolition of part of linking floorplate and structure from basement level 01 to level 06, demolition of roof and installation of new roof with associated roof garden, erection of new north facade, retention of south-east curved corner and part demolition of existing east facade from ground level to level 05, erection of new facade and shopfront, demolition of level 06 landing and extension to existing oval staircase to provide access to new roof with new core on north side incorporating new lift between roof top level and basement level 01, installation of new staircase between rooftop level and basement level 02, demolition of mezzanine at basement level 01, removal of internal partitions and associated works.

23. This report deals with the considerations for both applications.
24. The combined scheme provides 78,456sq.m GIA floorspace, comprising:
- 2,368sq.m of Commercial, Business & Service Use (Class E);
  - 2,051sq.m of Retail uses under Class E (a), (b) and (c);
  - 61,135sq.m of Office Use under Class E (g);
  - 1,331sq.m of Learning and non-residential institutions Use (Class F1);
  - 429sq.m of Flexible Learning and non-residential institutions Use/Retail purposes/Bar (Classes F1/E(a), (b), (c)/Sui Generis
  - 2,776sq.m of Flexible learning and non-residential institutions Use/Commercial, Business & Service Use (Classes F1/E); and
  - 8,366sq.m of Plant, Back of house and Storage

#### The proposed new building

25. The maximum height of the proposed development would be 83.60m AOD. The proposed new building would be an office-led, mixed use commercial building comprising of two basement levels, ground and 20 upper storeys. Retail and flexible commercial use space is proposed at



ground floor and offices are proposed on the upper levels 01 to 17. The top three levels (18-20) would house mechanical building plant.

26. South facing external amenity terraces accessible to the office occupiers are provided on levels 06 to 17. Basement level 01 contains retail floorspace and back of house ancillary storage, mechanical building plant, cycle parking and associated facilities. Basement level 02 comprises of mechanical building plant, a refuse store and a service yard with vehicle parking spaces accessed via vehicle lifts from Shoe Lane.
27. The proposed new building provides 73,187sq.m GIA floorspace, comprising:
  - 2,368sq.m Commercial, Business and service Use (Class E);
  - 1,926sq.m Retail Uses (Class E (a), (b) and (c));
  - 61,135sq.m Office use (Class E (g)); and
  - 7,758sq.m Plant, BOH and storage.
28. The proposed new building steps up from five storeys fronting Fleet Street to 21 storeys at the site's northern bullnose end. The proposed building is arranged architecturally as a series of layers of differing sizes, with each layer being a slightly different shape.
29. At ground floor, large retail units would be situated on the corners of the building, within the new arcade street north of the Daily Express Building and in the north at the bullnose with frontage onto Shoe Lane and St Bride Street. Smaller kiosk retail units are proposed along the south of the pedestrian passageway connecting the arcade street with St Bride Street.
30. A Cycle House is proposed on the north side of the new pedestrian passageway, with its principal entrance and frontage located on St Bride Street. The Cycle House would provide a front of house amenity dedicated to active travel for users of the building and local community. The Cycle House would provide access to the proposed new buildings cycle parking and facilities for the building occupiers. It would provide maintenance stations, a café/retail offer, valet parking for visitors and a concierge service for cargo cycles.
31. A large lobby occupies the ground floor with entrances fronting the new arcade street, Shoe Lane and St Bride Street. The lobby provides a connecting route to the retail unit to the north with the arcade street and Cycle House.
32. Basement 01 would provide retail floorspace adjacent to the site's southern boundary, back of house ancillary storage, mechanical building plant, cycle parking and associated facilities. Basement level 02 would comprise of mechanical building plant, refuse store and a service yard with vehicle parking spaces accessed by vehicle lifts from Shoe Lane.
33. Level 01 to 17 would provide Grade A Office workspace, in a wide range of sizes which are flexible and of high quality that promote health and well-being. The office space would have natural ventilation, access

to landscaped terraces and offer flexibility. The floorplates are adaptable and would accommodate new linkages between floors to suit tenant demands.

34. Landscaped, external, south facing amenity terraces are proposed at levels 06 to 17 which are accessible to office occupiers. The external terraces range in size and offer a comprehensive landscaping and greening strategy, incorporating robust green infrastructure.
35. A large biosolar roof would be integrated into the architecture at level 18. At level 05 there would be a biodiverse green roof terrace fronting Fleet Street.

#### The Daily Express Building (Grade II\*)

36. Following demolition of River Court, it is proposed that the Daily Express Building would become a standalone building. It is proposed the building would be opened up to the public for the first time in its history and it is proposed to provide a landmark cultural destination for Fleet Street with a new publicly accessible roof garden.
37. The Daily Express Building will provide 5,269sq.m GIA of floorspace, comprising:
  - 125sq.m Retail use (Class E (a), (b) and (c));
  - 1,331sq.m Learning and non-residential institutions Use (Class F1);
  - 429sq.m Flexible learning and non-residential institutions use/retail/bar (Class F1/E(a), (b), (c)/Sui Generis);
  - 2,776sq.m Flexible learning and non-residential institutions use/commercial, business and service use (Class F1/E); and
  - 608sq.m Plant, BOH and storage.
38. The Daily Express Building is proposed to become a publicly accessible, cultural destination. A cultural plan is submitted with the planning application which sets out an evidence based cultural vision for the building's future.
39. New elevations would be installed on the northern and eastern façade and would take inspiration from the original elevations to the south and west.
40. The overall height of the Daily Express Building would increase from 39.8m to 42.7m, this is due to the lift overrun at rooftop level which provides inclusive access to the public roof garden, the overrun is set back from Fleet Street.
41. The interior curtains at ground floor level would be removed to reveal views of the Art Deco interior to the passing public. The Fleet Street entrance would be reinstated as the building's principal entrance.
42. A new retail unit would be introduced on the east elevation, fronting Fleet Street and the new Arcade Street and a second retail unit is proposed in the north west of the ground floor, with frontage on to Shoe Lane, located beneath the cantilever.
43. At roof top level, the modern roof installed in the 2000 redevelopment

would be replaced. The oval stair would continue up to rooftop level which forms part of the public route from the Art Deco ground floor lobby.

44. At Basement 01, there would be flexible event and exhibition space, providing seating for circa 200 people.
45. At ground floor level the lobby would be opened up allowing public free access to the historic Art Deco Foyer, which would house a rotating exhibition of local partners within the window vitrines.
46. Upper ground to level 04 would provide flexible, complimentary uses to the cultural destination within use class F1 and E.
47. Level 05 would house a café and bar space with additional creative industry and artisan shops and bookstores or newsagent.
48. Level 06 it is proposed that an exhibition space for photography, print, typography, artefacts and spoken performances would be housed here.
49. Rooftop level would provide a free, accessible rooftop amenity space allowing the public to access the roof with views of the west of the City, the processional route and St Paul's Cathedral.

#### Pedestrian Access

50. The proposed development looks to maximise pedestrian connectivity where possible, whilst maintaining the access, security and operational requirements needed for the new building.
51. The proposals include the creation of the new, activated pedestrian routes through the site at ground floor level, linking Shoe Lane to the west with St Brides Street to the east. A new link, lined with retail units would be provided between the two buildings, increasing the permeability of the site. These routes would improve the site's pedestrian permeability by facilitating east-west movements whilst avoiding Fleet Street and are integrated into the wider public realm development.

#### Car Parking

52. The proposal would remove the provision of car parking spaces at basement level and would be a car free proposal. The development provides provision for two Blue Badge parking space within the service yard at basement level.

#### Consultations

53. The applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders including consultation with statutory and non-statutory bodies including the GLA, TfL, Historic England, City of London Police, the Surveyor of the Fabric of St Paul's Cathedral and the 20<sup>th</sup> Century Society. Public consultation was carried out during a time when face to face interaction was not possible due to

COVID19, a consultation website featuring the proposal launched on 28<sup>th</sup> April 2021 until 14<sup>th</sup> May 2021.

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

Consultation responses	
Historic England	<p>Historic England welcome the proposed works associated with the listed building and have no objection in principle to the redevelopment of the Rivercourt House. However, state that the proposed increase in scale will cause some (less than substantial) harm to the significance of designated heritage assets further afield and they believe this harm could be largely mitigated through a reduction in height of the proposed building.</p> <p>Historic England state that the proposals would enhance the significance of the Grade II* listed former Daily Express Building by detaching it from the large office development behind, and by providing it with a separate cultural use and associated public access. The public realm in this part of the City could also be much enhanced through the provision of new routes through the site and better connectivity.</p> <p>The scale of the proposed new building, however, means that it would have an impact on designated heritage assets further away. In particular, it would appear as a large element in the backdrop of Strand (WCC) and Temples (City of London) Conservation Areas when viewed from LVMF 16B.1, dominating the skyline of these historic areas and harming their significance. Based on the information submitted, Historic England believe this harm is in the middle of the less than substantial spectrum.</p> <p>Impacts such as these described here can progressively and fundamentally erode the character of conservation areas and the significance of nearby listed buildings, and it is important to recognise therefore that the harm identified above is a serious issue. Robust justification for any such harm is required under national planning</p>

	<p>policy.</p> <p>Historic England state that they have no objection in principle to the redevelopment of the existing Rivercourt House building and welcome the proposals for the Grade II* listed former Daily Express Building. They recognise the potential for a range of public benefits (including heritage enhancements and public realm improvements) resulting from the proposals and they note, however, that the proposed new building will result in an appreciable increase in scale here, which will have an impact on the settings of the conservation areas at Strand and Temples when viewed from Gabriel's Wharf. The significance of the historic environment when seen from this important river prospect is informed by a balance between low scale traditional buildings plus parkland and modern backdrop buildings. The visual balance is currently in favour of the foreground consisting of river, parkland and low scale buildings. The proposals would add a significant amount of new development on the skyline that would undermine that balance and cause harm.</p> <p>HE state that the harm would be in the middle of the less than substantial spectrum in the terms of the Framework, and would be contrary to the intent of the Framework's policies for the conservation of the significance of designated heritage assets, something to which great weight should be accorded (NPPF paragraphs 199, 200).</p> <p>Such harm requires clear and convincing justification and should be accepted only if the local authority concludes that there is such justification and that the harm would be outweighed by the public benefits the proposals would secure (NPPF paragraphs 200).</p> <p>Historic England state that a reduction in scale of the proposed Rivercourt House replacement building would mitigate the harm identified above and could also result in a less abrupt transition between the Grade II* listed former Daily Express building and the new development beyond. This would also enable a more appropriate balance between harm and public benefits.</p> <p><b>Response to comments:</b> Consideration of the impacts identified in Historic England's response are contained in the following sections of this report: Heritage, Fleet Street Conservation Area, Temples Conservation Area and Designated Heritage Assets.</p>
The Greater London Authority	<p>The GLA are broadly supportive of the scheme and the principle of a proposed office-led redevelopment within the CAZ, delivering high quality office floorspace, new cultural floorspace and enhanced public realm.</p> <p>GLA officers consider that the proposal will improve the visual appearance and setting of a Grade II* listed building, deliver a new building of high architectural quality and provide improved public realm</p>

	<p>and permeability throughout and around the site. The proposal would not result in harm to the significance of heritage assets or impact upon locally important or strategic views.</p> <p>They welcome the car free development however have concerns with the relocation of bus stops during the construction period. They have requested a contribution towards the upgrade of the Cycle Hire Docking Station on St Bride Street. Furthermore, GLA officers have suggested conditions surrounding Sustainability and Environmental issues.</p>
Transport for London	Transport for London confirms that the proposed cycle and car parking is acceptable and complies with the London Plan. They have requested a highways improvement plan be secured through the S.106 agreement and object to the relocation of the Bus Stop on Fleet Street to facilitate pit lanes.
Natural England	No objection
Ancient Monument Society	<p>The Ancient Monument Society have no objection to the principle of redeveloping the 1990's River Court building and welcome the proposed separation of the Grade II* listed former Daily Express Building from the adjoining development and state that this is a positive outcome that will enhance both the significance and appearance of this important heritage asset.</p> <p>However, the AMS is deeply concerned about the substantial increase in the size and scale of the replacement building on the River Court site and the impact it would have on the settings of the Daily Express Building, the adjacent conservation areas, and wider views of the area.</p> <p>They state that the proposed building is designed as a series of stepped terraces increasing in height from 6 storeys at Fleet Street to its highest point at 21 storeys at the north end of the site. Whilst separate, the new building still surrounds and 'dwarfs' the Daily Express Building. The proposed context elevations (drawing PA-70-200) clearly show that a single building of this height that extends the full 140m length of this site is simply too big and out of context with the surrounding development and the adjacent conservation areas. The predominant built form around Fleet Street, including the existing building, is of much smaller individual building units, and this should be reflected in any redevelopment of the site. Likewise, the monotonous design of the ground floor level provides little in the way of interesting, active or distinctive street frontages that are needed to create a sense and distinctive sense of place as a continuation of the conservation area. It runs the risk of replicating the poor building/ pedestrian interface now experienced along much of Bisphosphate.</p> <p>AMS state that of particular concern is the way the proposed building</p>

	<p>intrudes into view 16B of St Paul's Cathedral, Temple Gardens, St Bride's Church and the Embankment, as identified in the London View Management Framework Supplementary Planning Guidance (March 2012). This part of London is characterised by low scale and traditional buildings and the significant intrusion of the proposal on the skyline that would cause considerable harm to this important vista across the River Thames and to the character of the conservation areas.</p> <p>They state that they do not believe that clear and convincing justification has been provided for this level of harm, nor is it outweighed by the benefits of the new pedestrian access around the Daily Express Building and upgrade to the surrounding laneways. They therefore recommend a reduction in height and scale of the replacement building, including articulation to the long side elevations to St Bride Street and Shoe Lane, in order to mitigate the harm caused to the Grade II* listed former Daily Express building, the adjacent conservation areas, and wider views of the area.</p> <p><b>Response to comments:</b> Consideration of the impacts identified in Ancient Monument Society's response are contained in the following sections of this report: Heritage and Designated Heritage Assets.</p>
Twentieth Century Society	<p>The Twentieth Century Society welcomes the proposals to facilitate the reuse of the Daily Express Building and has no objection in principle to the redevelopment of the neighbouring River Court Building.</p> <p>However, raises concerns that the proposed design for the new building will harm the setting of the Daily Express Building and considers the design to be too overbearing. Furthermore, they state that the proposal would harm the buildings setting and will have a detrimental impact on the nearby Fleet Street Conservation Area.</p> <p><b>Response to comments:</b> Consideration of the impacts identified in Twentieth Century Society's response are contained in the following sections of this report: Heritage and Designated Heritage Assets.</p>
London and Middlesex Archaeological Society (LAMAS)	<p>LAMAS endorse wholeheartedly the comments made by Historic England (HE) regarding the heritage impact of the proposed development. They state at 22 storeys, the maximum height of the new building comfortably exceeds anything else in the vicinity and therefore risks being overly intrusive and harmful to the settings of nearby Conservation Areas as well as other designated heritage assets. As the HE letter makes clear, such harm constitutes a serious issue. Similarly, the height of the new building relative to the Grade II* listed Daily Express Building would appear to be overly dominant and hence harmful to its setting, counteracting the benefits that could derive from the improved treatment of the rear of the listed building.</p>

	<p>LAMAS note the relevance of National Planning Policy Framework paragraph 196 regarding the weighing of less than substantial harm to the significance of a designated heritage asset against the public benefits of a proposal development and state that a less lofty design that seeks to emulate rather than exceed the heights of the existing buildings in the vicinity would cause less harm to the settings of the Daily Express Building and nearby Conservation Areas while delivering the key project aims of new, better quality office spaces and public realm. In this regard it is noteworthy that the Design and Access Statement speculates about the 'post-pandemic workplace' (page 22) yet fails to consider surely the most important change — the reduced demand and hence need for large offices.</p> <p>LAMAS has concerns regarding the environmental sustainability of the proposed development. They state that the embodied carbon represented by the already very large existing building is far from negligible and becomes an even more relevant consideration in the context of a climate emergency being declared by many public institutions. They note the goals of City of London's recently adopted Climate Action Strategy include supporting the achievement of net zero for the Square Mile by 2040'; planning decisions would seem to have a key role to play in making this happen. Surely elements of the River Court building, constructed no more than 30 years ago, are capable of being creatively repurposed instead of the whole building being demolished in order to be replaced by in essence a larger version of the same structure.</p> <p>They conclude that the proposed demolition of River Court and its replacement by an even larger and taller office building would result in harm being caused to the settings of the Temples and Strand Conservation Areas, as well as to the nationally significant Daily Express Building. Furthermore, the proposed development comes across as out of step with the times when it comes to future working practices and the climate crisis. A scaled-down version of the scheme, such as proposed already by HE but perhaps also incorporating retained elements of the existing 1990s building, would deliver much the same benefits only to far less harmful effect and that planning permission therefore should not be granted for the development in its present form in order to stimulate the production of more environmentally-appropriate proposals.</p> <p><b>Response to comments:</b> Consideration of the impacts identified in LAMAS response are contained in the following sections of this report: Heritage and Designated Heritage Assets.</p>
Environment Agency	No comments
Thames Water	Raised no objections and have provided conditions to be included
Lead Local Flood	Conditions are recommendation requiring details to ensure that sustainability, flood risk reduction and water runoff rates are improved.



Authority	
National Air Traffic Services (NATS)	The proposals do not conflict with the current safeguarding criteria and so there is no objection.
Heathrow Airport	The proposals do not conflict with the current safeguarding criteria and so there is no objection.
London City Airport	The proposals do not conflict with the current safeguarding criteria and so there is no objection.
Transport for London Crossrail Safeguarding	No comments
City of Westminster	No comments
Tower Hamlets	No comments
London Borough of Southwark	The London Borough of Southwark state that the proposal does not affect any of the LVMF views where Southwark Council is a statutory consultee. They acknowledge that the proposal is visible from certain locations on the Southbank including from the Oxo Tower and the Sea Containers part of the River Walk but does not affect the viewers ability to recognise and appreciate any of the strategic landmarks in these views. No objection is raised.
London Borough of Lambeth	The London Borough of Lambeth raise no objection to the development but would like to draw to the City's attention the potential impacts on the appreciate of view towards the City from Lambeth. They state that the proposal may appear in the backdrop of the spire of St Bride's Church from the east of the riverfront promenade and that the proposal is visible in locally designated views NE from The National Theatre terrace to St Pauls Cathedral. They state that the foreground skyline would be negatively impacts and that proposal would introduce a new, tall massing amongst the cluster of historic spires.
London Borough of Camden	Raises no objection.
Royal Borough of Greenwich	Raises no objection.
City of London Conservation Area Advisory Committee	The Committee had no objections to the change of use but objected strongly to the proposal considering it to be excessively large and out of proportion and denigrated the importance of the listed Daily Express building in the streetscape. The Members considered that the scale and style of the building was inappropriate in this location as it would be twice the height of the proposed Central Criminal Court building and that the proposed façade was incongruous in this location and would detrimentally affect the character and appearance of this Conservation Area.

	<b>Response to comments:</b> Consideration of the impacts identified in The City of London Conservation Area Advisory Committees response are contained in the following sections of this report: Heritage, Fleet Street Conservation Area, Temples Conservation Area and Designated Heritage Assets.
Landsec	Are supportive of the scheme which they consider would provide valuable regeneration benefits to the area of Fleet Street, the wider City of London and beyond.

57. A total of 26 representations have been received objecting to the application. The objections and the responses to these issues are summarised in the table below.

Letters of representation		
Representations received	Number	Response
Noise	19	Addressed in paragraphs 471 – 474
Heritage and massing	14	Addressed in paragraphs 110 – 320
Disturbance from terraces	14	Conditions are proposed which control the hours of use of the proposed amenity terraces and public roof terrace.
Overshadowing	13	Addressed in paragraphs 430 – 432
Loss of daylight	11	Addressed in paragraphs 387 – 423
Disturbance during construction	12	Addressed in paragraph 369
Pollution	12	Addressed in paragraph 456, 487 & 493
Detrimental to residential amenity	10	Addressed in paragraphs 370 – 521
Harm to the Fleet Street Conservation Area	7	Addressed in paragraphs 228 – 240
Anti-social behaviour	9	This would be addressed through the management plan secured through a S.106 agreement.
Effect on property prices/ability to rent	8	This is not a material planning consideration.
Close proximity to residential	6	Addressed in paragraphs 370 – 521
Harm to other nearby heritage assets	3	Addressed in paragraphs 110 – 320
Harm to Grade II* Listed Daily Express Building	1	Addressed in paragraphs 191 – 209
Detrimental to visual amenity	3	Addressed in paragraphs 110 – 320
Environmental impact of demolition	1	Addressed in paragraphs 471 – 474, 478 & 521

Inadequate active frontage	1	The proposed active frontage increases from the current building. An uplift of 1,068sqm Class E (a, b, c) retail uses is proposed with an enhanced retail presence directly onto Fleet Street as well as on surrounding streets including Shoe Lane, which is welcomed. In addition, 429sqm flexible Class F1/E (a,b,c/sui generis) provides scope for further retail floorspace to be delivered.
Health concerns	1	Addressed in paragraphs 475 – 479
Damage to neighbouring buildings	1	Addressed in paragraphs 110 – 320

58. Not all the representations above are material planning considerations. Those that have been dealt with in this report.

### **Policy Context**

59. The development plan consists of the London Plan and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report
60. The City of London has prepared a draft plan which is a material consideration to be taken into account.
61. The draft City Plan 2036 was subject to pre-submission consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, between March and May 2021. As such, the draft City Plan is a material consideration in the determination of applications alongside the adopted Local Plan.
62. Government Guidance is contained in the National Planning Policy Framework (NPPF) 2021 and the Planning Practice Guidance (PPG) which is amended from time to time.
63. There is relevant GLA supplementary planning guidance and other policy in respect of: Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014), Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014), Sustainable Design and Construction (GLA, September 2014), Social Infrastructure GLA May 2015) Culture and Night-Time Economy SPG (GLA, November 2017), London Environment Strategy (GLA, May 2018), London View Management Framework SPG (GLA, March 2012), Cultural Strategy (GLA, 2018); Mayoral CIL 2 Charging Schedule (April 2019), Central Activities Zone (GLA March 2016), Shaping Neighbourhoods: Character and Context (GLA June 2014); London Planning Statement SPG (May 2014); Town Centres SPG (July 2014); Mayor's Transport Strategy (2018) and the Culture 2016 strategy.

64. Relevant City Corporation Guidance and SPDs comprises Air Quality SPD (CoL, July 2017), Archaeology and Development Guidance SPD (CoL, July 2017), City Lighting Strategy (CoL, October 2018) City Transport Strategy (CoL, May 2019), City Waste Strategy 2013-2020 (CoL, January 2014), Protected Views SPD (CoL, January 2012), City of London's Wind Microclimate Guidelines (CoL, 2019), Planning Obligations SPD (CoL, October 2021), Open Space Strategy (CoL 2016), Office Use (CoL 2015), City Public Realm (CoL 2016), Culture Mile Strategy (2018); Cultural Strategy 2018 – 2022 (CoL, and relevant Conservation Area Summaries.
65. In respect of sustainable development, the NPPF states that paragraph 10 that 'at the heart of the Framework is a presumption in favour of sustainable development.' At Paragraph 11(c) the NPPF states that for decision making this means 'approving development proposals that accord with an up-to-date development plan without delay'. Paragraph 11(d) of the NPPF is not engaged since the policies which are most important for determining the application are not out of date; rather they are up to date.
66. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
- a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
  - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
  - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)
67. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
68. 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".
69. 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".
70. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 126 advises that "The creation of high-quality buildings and places is fundamental to what the planning and development process

should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.

71. Paragraph 130 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and create places that are safe, inclusive and accessible and which promote health and wellbeing.
72. Paragraph 134 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
73. Chapter 14 of the NPPF relates to climate change, flooding and coastal change. Paragraph 155 states that new developments should increase the use and supply of renewable and low carbon energy and heat through measures including renewable and low carbon energy sources and identifying opportunities to draw energy supply from decentralised supply systems.
74. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. 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.
75. 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.”
76. 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”.

77. 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.”
78. 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. When carrying out the balancing exercise in a case where there is harm to the significance of a conservation area, considerable importance and weight should be given to the desirability of preserving or enhancing the character or appearance of the conservation area.
79. 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.”

### **Considerations**

80. The Corporation, in determining the planning application has the following main statutory duties to perform:
- To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations. (Section 70 Town & Country Planning Act 1990);
  - To determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
81. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

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

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

87. The City of London is the world's leading international financial and professional services centre and a driver of the national economy, continually innovating and developing new business areas and flexible ways of working. The quantity and quality of new development, particularly office-led development, will meet growing business needs, supporting and strengthening opportunities for the continued collaboration and clustering of businesses that is vital to the City's operation.
88. 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.
89. The London Plan 2021 recognises London is the engine of the UK economy, accounting for more than a fifth of the country's economic output. Its labour market, housing market and transport links are interconnected with the wider South East city region, which shapes the development of the whole of the UK. Together, London and the Wider South East contribute a full half of the country's output. London has unique strengths in specialist fields like finance, business services, technology, creative industries and law, as well as attracting tourists from around the world, providing a gateway to the rest of the UK. The wealth this generates is essential to keeping the whole country functioning.
90. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. London Plan Policy SD4 recognises the CAZ as a centre of excellence and specialist clusters including functions of state, health, law, education, creative and cultural activities, and other more local Special Policy Areas should be supported and promoted.
91. The City Plan 2036 Spatial Strategy states the City Corporation will facilitate a vibrant, thriving and inclusive City, supporting a diverse and sustainable London within a globally successful UK. Subsection 2 of the Spatial Strategy promotes the delivery of sustainable growth following the Covid-19 pandemic, including a minimum of 2 million metres squared net additional office floorspace, and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone. Subsection 3 promotes broadening the City's appeal by ensuring new office developments deliver healthy working environments and meet the needs of different types of businesses, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses.



92. The London Plan projects future employment growth across London, projecting an increase in City employment of 116,000 between 2016 and 2035, a growth of 22%. 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.
93. 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 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.
94. 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.
95. A total of 61,135sq.m GIA of high-quality office floorspace (Class E) is proposed across the two buildings. The existing office floorspace is 57,835sq.m GIA so there would be an uplift of 3,300sq.m GIA in office floorspace across the site.
96. 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 and as outlined in the City of London document: London Recharged: Our Vision for London 2025.

### **Proposed uses**

#### **The proposed new building**

97. The proposed new building has been designed to provide a flexible workplace-led mix of uses. The 20 storeys above ground would predominantly provide office use (Class E) with flexible retail use (Class E (a), (b) and (c)) and Cycle House (Class E) at ground floor level. The top three levels (18 to 20) would contain mechanical plant. South facing external terraces are provided on levels 06 to 17 for the amenity of office occupiers. Two new pedestrian routes are created, one external east to west passageway is provided at ground floor,

connecting Shoe Lane to St Bride Street and secondly, an internal north south route provided through the new building, connecting the retail unit at the northern bull nose to the new arcade street and east to west passageway.

#### Daily Express Building

98. The Daily Express Building is proposed to become a publicly accessible, cultural destination. A cultural plan is submitted with the application and a Cultural Implementation Strategy is secured via a S.106 agreement. The proposed uses provide flexibility that is required in the planning stage as it is acknowledged that the proposed cultural uses are indicative at this stage and subject to refinement as a viable cultural operator develops. The proposed indicative uses envisaged within the Daily Express Building include flexible mid-scale event and exhibition space, public access to the Art Deco Foyer, public exhibitions, flexible complimentary uses (Class F1/E), café and bar space and an accessible public roof garden.

#### Provision of Office Accommodation

99. Strategic Policy CS1 of the City of London Local Plan 2015, emerging Policy S4 and policy 4.2 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2036 and policy E1 of the London Plan.
100. The proposed development combined would provide 61,135sq.m GIA of office floorspace comprising well designed, flexible office accommodation in a sustainable building, further contributing to the nationally significant economic activity in the City and contributing to its attractiveness as a world leading international financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ and supports the aims of Local Plan policy CS1 and emerging City Plan policy S4.
101. The office floors range in sizes and have been designed to fit future trends, the design maximises flexibility and allows for a multiple tenancy per floor. As a result of the building's form the floors vary in area, creating a diverse offer to suit the needs of different potential tenants. The offices have natural ventilation, access to nature and external amenity terraces are provide on levels 06 to 17, allowing for natural ventilation when the external conditions are right, an important element of post Covid workplaces. The terraces would provide high quality amenity space for City workers and would contribute to the urban greening of the building. The proposed office provision

addresses the needs of international business in accordance with Local Plan policy DM1.2 and emerging City Plan 2036 strategic policy S4 and policy OF1.

102. The office entrances are located on St Bride Street, Shoe Lane and the new arcade street. The St Bride Street elevation would include a Cycle House (Class E) at ground floor and basement 01 level. The improved office accommodation supports the aims of Local Plan Policy CS1: Offices and would provide flexible office floorplates for workers which are designed to meet the needs of a wide range of potential occupiers, in accordance with adopted and emerging Local Plan policies.

### Retail Uses

103. The existing site contains one retail unit on Fleet Street that is in the former A1 use class, the unit is located within the Fleet Street Principal Shopping Centre (PSC). The existing total area of retail floor space is 983sq.m GIA.
104. The proposed scheme would provide 2,051sq.m of new retail Class E space, across six units at ground floor level, fronting Fleet Street, Shoe Lane, St Bride Street and the new east to west arcade street. There would be an uplift of 1,068sq.m GIA retail floorspace at ground floor level in the PSC.
105. Adopted Local Plan Policies CS20 and DM20.1 prioritise A1 uses within PSCs and seek to resist the loss of retail frontage and floorspace and aims to maintain at least 70% of retail frontage within a PSC in A1 use. The adopted Local Plan aims to maintain at least 70% of retail frontage within a PSC in A1 use. The proposal would accord with the requirements of Policies CS20 and DM20.1 of the Adopted Local Plan.
106. The emerging proposed Draft City Plan 2036 Strategic Policy S5 seeks to improve the quantity and quality of retailing and the retail environment, promoting the development of the City's four PSCs and the linkages between them. Policy RE1 seeks that the loss of ground floor retail frontages and/or floorspace will be resisted and additional retail provision of varied unit sizes and frontage lengths will be encouraged, supported by complementary uses that increase footfall and provide active frontages.

### Cycle House

107. The proposed new building would include a Cycle House, Class E use for use by the local community, workers and visitors. The Cycle House is accessed via St Bride Street and would include facilities for building occupiers, incorporating maintenance stations, a café/retail offer, valet parking for visitors and a concierge service dedicated to cyclists, including cargo bike delivery. The cycle house would be linked internally to the northern bullnose retail unit and lobby area. In total, the cycle house would be able to accommodate 234 bicycles, of which 85 would be short stay cycle spaces and 149 long stay cycle parking spaces. The proposed cycle house is in line with London Plan Policy T5, and DCP Policy W2 and W3. The provision and details of the cycle

house would be secured by S106 obligation.

108. The cycle house is an innovative concept, providing a dedicated internal space within the commercial building footprint for use by visitors to the two buildings and to the wider area, and within close proximity to two major cycleways. The area would provide secure cycle parking sheltered from the elements. A cycle house management plan will be secured by S106 obligation. In the plan, the applicant would be required to detail the arrival experience and how the hub would be highlighted as a public facility. The City's Strategic Transportation team will develop a common approach to signage and branding to identify cycle parking that is available for public use. It is expected that this signage would be used at this development and across the City on future developments to create a consistent, legible signpost for visitor cycle parking within private developments.

### New Public Routes

109. Local Plan policies CS19 and DM19.1, draft City Plan 2036 policies S8(3 and 5), OS1, S14 and D3, London Plan Policy 7.18 and London Plan Policies D3, D8 and G4, seek to increase the quality, quantity and accessibility of public open space, including new streets and routes in places. This scheme provides an accessible north south route through the building, connecting the northern retail unit with the new arcade street and provides a new external east to west route through the site, connecting Shoe Lane with St Bride Street providing an alternative to using Fleet Street. The new route through would be open 24hours, 7 days a week with the applicant retaining the right to close the route periodically for maintenance and the purpose of retaining title ownership under law.

## **ARCHITECTURE AND URBAN DESIGN**

### **Principle of a Tall Building**

110. The proposal is defined a tall building under the adopted Local Plan (CS 14, para 3.14.1) and draft City Plan 2036 (S12(1), 75m AOD>) – as at its highest the building would be c.95m AOD. The current building is 58.75m AOD at its highest.
111. The part of the site containing the former grade II\* listed Daily Express Building is in the Fleet Street Conservation Area, while a part of the remainder breaches the Wider Setting Consultation Area (Background) of the LVMF Protected Vista from Greenwich Park. Local Plan Policy CS 14 and City Plan Policy S12 deem such areas inappropriate for a tall building.
112. The listed former Daily Express Building is the only part of the site in a Conservation Area and is proposed to be physically detached from the tall building element, and so would not constitute a tall building in the Conservation Area – the tall building element would be outside a conservation area.
113. In relation to the LVMF impact from Greenwich Park, a breach of the Wider Setting Consultation Area (Background) of the Protected Vista is

subject to a qualitative, rather than a quantitative, judgment-based assessment of impact. For the reasons given at paragraphs 139 – 142, it is not considered the tall building element would injure the relevant view, according with relevant policies and associated guidance.

114. The proposal is opposite and nearby tall buildings, at Peterborough Court (c.75m AOD), the Deloitte Building (c.85m AOD) and at New Street Square (c.85m AOD). Given the exceptional breadth of the site, a contextual height is achieved via a cascading from c.95m AOD to a shoulder height of c.31m AOD on Fleet Street. For the reasons at paragraphs 228 – 240, it is considered that the proposal would preserve and enhance the character, appearance and significance of the Fleet Street Conservation Area.
115. It is considered that a tall building of this form is acceptable in principle, having regard for the criteria set out in CS 14(3) and S12(2-6), and the wider provisions of the Development Plan.

### **Design Approach:**

116. It is considered the scheme would represent 'Good Growth' by-design, in accordance with the London Plan Good Growth objectives GG1-6, that is growth, which is socially, economically and environmentally inclusive. It would promote a high standard of design and sustainable buildings, streets and spaces, which are contextual and appropriate to character and surrounding amenities, making an effective use of limited land resource, in accordance with Core Strategic Local Plan Policy CS 10 (Design) and City Plan Policy Strategic Policy S8 (Design).
117. The scheme would comprise a commercial modern workplace-led mixed-use scheme, delivering a diverse mix of complementary retail and cultural uses of a composition, disposition and layout which would deliver a new dynamic and vibrant destination for Fleet Street, day and night, in accordance City's broader visions to deliver outstanding places and diverse ecosystems in 'City Recharged' (2020), 'Future City' (2021) and 'Culture and Commerce' (2021). It will be an essential ingredient in transforming the fortunes of Fleet Street as a 'Key Area of Change'.
118. The cultural transformation of the Daily Express Building into a new cultural landmark, not just for the City, but for London, would add an essential new ingredient facilitating the diversification of the wider offer on Fleet Street, adding further interest and vibrancy. Secured via section 106, the final cultural offer would have a social and educational outreach remit which is socially and economically inclusive, drawing in a wider audience and demographic to this part of the City, complementing and enabling and enriching that existing ecosystem of cultural provider around Fleet Street.
119. The height, bulk, form and massing, in accordance with CS 10, DM 10.1 and City Plan Policies S8 and DE2, would make an appropriate contextual response to a large island site, transitioning and mediating from a shoulder height response to the building line, prevailing grain,

scales and cornice datum of Fleet Street, while cascading in a dramatic and sublime manner from a summit at the northern end which is a response to the current and emerging heights in the vicinity of New Street Square. The new tall building would deliver a new signifier for Fleet Street, an attractive architectural landmark on the London riparian skyline.

120. A fundamental architectural 'move' is to detach the larger neighbour, River House, which over time subsumed and annexed the Daily Express Building, liberating and allowing the Daily Express Building a renewed integrity and freedom of expression. This will accentuate its presence as a key Fleet Street historical landmark. New (and re-used) work would be to match the distinctive original host, delivering a coherent character in composition and appearance, of appropriate modelling and detailed design, subject to detail reserved for condition. The roof extension comprising the public roof garden core, would adopt the character of the host, be subservient and would not be visible from street level.
121. The form, disposition of public realm, detailed design and landscaping approach have been designed to optimise microclimatic conditions, including delivering optimal wind and thermal comfort conditions, whilst canopies and oversailing is creatively used for dramatic effect, whilst providing shading and protection from inclement weather, enhancing open spaces and views in accordance with London Plan Policy D3 and City Plan Policy S8.
122. The proposal would transform an impermeable and introvert 'groundscraper', with new public realm carved out at street level, taking the appropriate form of an extension to Fleet Street's iconic, human-scaled and pedestrianised courts and alleys – better stitching the site into that rich fine urban grain. Externally, the memory of lost City courts would be reimagined in the form of a north-south route between Fleet Street and the office entrance and a continuous west-east route between Shoe Lane and the junction of Poppin's Court and St Bride's Street. Complementing this would be time-limited publicly accessible ground floor interiors, which would include cultural curation/programming secured via the Cultural Implementation Strategy, as a continuation of the north-south route and another cut through west-east between the north end of Shoe Lane and Harp Alley via St Bride's Street, building on the City's tradition of inclusive accessible buildings. These would provide more pedestrian-focused streets which promote active travel and are comfortable, convenient and attractive, in accordance with London Plan Policy D3 and City Plan Policy S8.
123. These routes and the current streets would be substantively enclosed by public-facing, active, usable, permeable, visually interesting and well-lit active frontage, which would provide a good level of interest and passive natural surveillance. In association with the uses, their disposition and layout, and secured via the Cultural Plan Implementation Strategy, the proposal would deliver positive relations

between what happens inside the building and outside in the public realm, with frontage which defines and activates the edge and animates and generates liveliness in the public realm, in accordance with London Plan Policy D3 and D8, Local Plan Policies CS 10(3) and DM 10.1(Bullet 5) and City Plan Policies S8(6) and DE2(2,Bullet 4).

124. This has been optimised with consideration of site constraints, in particular the difficult levels and the accommodation of essential building servicing. For example, where level change prevents extended access, the building 'plinths' (or stall risers) are being detailed to allow an architectural interaction between social independent retail spaces inside and provide outside incidental seating/dwell spaces to provide a useable active edge. Cultural vitrines/micro-exhibitions, including those original Express vitrines to Fleet Street, will be installed to allow the cultural use to permeate the wider business ecosystem and allow for year-round dynamic interest, the detail of which is reserved for condition.
125. Irrespective of the approved drawings, full details of the ground floor frontages are reserved for condition to ensure these are well-detailed and can successfully integrate signage, building services and are useable.
126. The new routes and the disposition of uses have been designed with character and connectivity in mind - making an appropriate response to the nature and scale of the street, making wider pedestrian-orientated connections across Fleet Street's courts and between here and Thameslink to the north and south. These routes would open new experiences of Fleet Street, including a central enclosed vista centred on the distinctive steeple of St Bride's, creating a townscape moment helping 'knit' the proposal into the intrinsic character of the locale.
127. Much animation of the ground plane will be generated by the strategic relocation of servicing away from residents on the Poppin's Court/St Bride's Street junction to Shoe Lane. This repurposes the most generous retained ground floor volume, the current servicing bay, transforming it into the sustainable transport 'hub', an integral part of the principal arrival experience from all directions, but in particular from what is considered be the main entrance, from St Bride's Street. Whilst facilitating the retention of as much structure, and thus embedded carbon, as possible, this orientation is well-suited to building on proximity and sightlines from those most sustainable transport modes – from the Cycle Superhighway and Thameslink/Blackfriars to the south and east. The hub would incorporate prominent and seamless level access, a café, cycle repair/maintenance and an innovative mixed private/public long and short term stay autonomous cycle rack, contributing a bit of street theatre in the local context, constituting a celebrated cyclist/pedestrian arrival experience which is convenient and attractive, delivering the City's Transport Strategy by-design.
128. The re-location of servicing to Shoe Lane would subdue its visual and physical influence on the wider public realm, lessening the current conflict between pedestrian/cyclist and vehicular traffic at the junction

of Poppin's Court and St Bride's Street. The consolidated and off-peak servicing offer, addressed at paragraphs 341 – 348, allows St Bride's and Shoe Lane to become more pedestrian priority. This also allows for wider transformative public realm works which would enhance the immediate setting and approaches, making a public realm which is more comfortable, convenient, green and attractive.

129. New public realm would comprise a seamless extension of the City's continuous public realm, utilising the material palette and detail established in the City Public Realm SPD and the associated Technical Guide, with final detail reserved for condition.
130. An appropriate management, curation and programming of the public realm, both internal and external, would be ensured via section 106 Visitor Management Plan and Cultural Implementation Strategy, to ensure the spaces achieve the highest standard of inclusive design for a diverse range of users, whilst ensuring that appropriate management arrangements are in place which maximise public access and minimise rules governing the space in accordance with London Plan Policy D8(H) and guidance in the (draft) Public London Charter.
131. In accordance with Local Plan Policy DM 10.3(2) and CS19 and City Plan 2036 Policies S8(3) and DE5(3) the proposal would optimise the amount of accessible roof terraces offering access to clean fresh space, openness, nature and views, including the new public 'pocket garden' on the roof of the Daily Express Building providing spectacular mid-range views accessible to all and with independent access from the cultural anchor. Irrespective of the approved drawings, final landscaping details would ensure high quality dwell space, including the provision of informal play for children.
132. The proposal would deliver green infrastructure as integral to the site and building design, subject to landscaping and wider public realm works secured through section 278, including a significant focus on optimising the quantum and planting pallet of the extensive south-facing terraces in a manner which is human-centred, seeking to improve health and wellbeing, whilst maximising admittance of natural light both inside and out. Final details, including planting palettes, specifications and fit out, are reserved for condition with the intent to optimise the inherent biodiversity and wellbeing benefits.
133. M&E plant and building services would be accommodated so as to deliver a coherent and well-detail roofscape, visually integrated into the roof and overall design when viewed from the street and high level, screened from general view, in accordance with Local Plan Policy DM 10.1 and DM 10.3 and City Plan Policies S8 and DE2.
134. Appropriate lighting, in accordance with Local Plan Policy DM 10.1 and City Plan Policies S8(11), DE3 and DE9, would deliver a sensitive and co-ordinated lighting strategy integrated into the overall design, minimising light pollution, respect context and enhance the unique character of the City by night. Irrespective of the approved drawings, a detailed Lighting Strategy would be subject to condition to ensure final



detail, including from, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with guidance in the City Lighting Strategy, "Light + Darkness in the City / A Lighting Vision for the City of London (2018). The proposed 'direction of travel' seeks to build on those special spatial lighting design expectations of the Fleet Street Character Area, seeking low level and architectural illumination which enhances the pedestrian experience.

135. Overall, the proposal would optimise the use of land to deliver a transformative new mixed-use destination for Fleet Street, delivering a new contextual architectural landmark to signify the Key Area of Change. It would respect Fleet Street's heritage while providing a dynamic vision of the future. It would result in an inclusive form of development, the result of the diverse mix, disposition, management, curation and programming of the uses and public realm, internal and external, transforming a banal, introvert and impermeable monolith into a sleek and striking architectural companion to a regenerated Daily Express Building itself put over to a new cultural hub for the City and London, which would enrich and enable the wider cultural ecosystem around Fleet Street, marrying commerce and culture in an engaging way which would activate and animate the public realm. It would deliver a significant uplift in new public realm, enhancing convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy.
136. It is considered the proposal would constitute Good Growth by design high in accordance with Local Plan Policies CS 10 and DM 10.1 and City Plan Policies S8 and DE2, policies contained in the NPPF and guidance in the National Design Guide, contextualised by the Good Growth objectives, GG1-6.

### **Strategic Views:**

#### **London View Management Framework (LVMF) – Impact:**

137. The LVMF designates pan-London strategic views deemed to contribute to the Capital's character and identity at a strategic level. Those relevant strategic views where there would be a material impact are addressed here against London Plan Policy HC 4 and associated guidance in the London View Management Framework Supplementary Planning Guidance (the SPG).
138. The proposal is potentially visible in some of those wider London Panoramas, in particular via magnification. These have been assessed and it is considered that the impact would be neutral and so these have been scoped out of this detailed assessment.

#### **View 5 (5A.2), London Panorama, Greenwich Park:**

139. The impact would be from Assessment Point 5A.2, at the eastern extent of the panorama towards central London and St Paul's Cathedral, which is the sole Strategically Important Landmark (SIL), inclusive of a Protected Vista. Other relevant identified landmarks include Tower Bridge, the Monument, the Shard and the City Cluster. The proposal would breach the Wider Setting Consultation Area (Background) of the Protected Vista.

140. The visual management guidance identifies the background of St Paul's as mostly unimpeded, with a clear silhouette afforded to the dome (above peristyle) and western towers, whilst the sky etched silhouette is considered crucial to the ability to recognise and appreciate the Cathedral (paragraph 42). The proposal would be sited south and west of the Cathedral, appreciated at a noticeable distance from the Cathedral not to 'crowd' it, or to create a sense of a 'canyon effect', in particular as it is 'shadowed' by other tall built development around New Street Square, where it would consolidate this clustering of taller built development with a new high quality building, in accordance with paragraphs 57, 60, 61, 63 and 146 of the SPG.
141. On renewed focus or via magnification, the height would fall below that of the Cathedral, which would still rise above surrounding built form in its strategic siting atop Ludgate Hill, whilst its distinctive silhouette would remain unaffected, in accordance with paragraph 147 of the SPG. The proposal would not unacceptably impose on a landmark, all of which would still be given appropriate context, preserving their setting and contribution to the special characteristics of the view, in accordance with paragraphs 57 and 58 of the SPG.
142. Overall, the proposal would not harm the characteristics or composition of the strategic view and its landmark elements, including the ability to recognise and appreciate St Paul's as the SIL.

View 11 (11A.1), River Prospect, London Bridge (upstream):

143. St Paul's Cathedral is the sole SIL, while other landmarks include the Cannon Street Station towers, the Old Bailey and St Bride's Church in a broad and deep riparian composition. The visual management guidance identifies the skyline presence of St Paul's and the positive visual interaction it has with the 'Wren-esque' Cannon Street Station (para 191), which the proposal would not dilute, in accordance with paragraph 193-4. The proposal, situated at a discernible distance to the west of the Cathedral and of an appropriate height and attractive form on the horizon, would not visually dominant the Cathedral in accordance with paragraphs 194 and 197, consolidating a small cluster of taller buildings around New Street Square.
144. The proposal would not obscure or detract from a contributing landmark in the composition, in accordance with paragraph 195, whilst the tiered summit form of the architecture would offer an appropriate and welcome vertical skyline inflection helping address the overt horizontal emphasis and create a more interesting skyline, in accordance with paragraph 196.
145. Overall, the proposal would not harm and would make a positive contribution to the characteristics and composition of the strategic view and its landmark elements, including preserving the ability to recognise and appreciate St Paul's as the SIL.

View 12 (12A.1-2), River Prospect, Southwark Bridge (upstream):

146. St Paul's Cathedral is the sole SIL, whilst other landmarks include Millennium Bridge and St Bride's Church in a broad riparian

composition.

147. The visual management guidance, paragraph 209, describes the broad expanse of the River as dominated by St Paul's which, as a result of the recessive backdrop presence of the proposal in this view, is a situation which would remain intact. In accordance with the guidance, the proposal would neither dominate nor impose on the Cathedral - the viewers ability to recognise and appreciate it would be unharmed, while the high-quality architecture would complement its wider skyline setting, in accordance with paragraphs 211, 213 and 214.
148. The proposal would add further complementary built form in a busy jostling and juxtaposition of architectural elements which convalesce to form a strong striated layering in the general fore and middle ground townscape identified at paragraph 210. The proposal would not obscure or detract from a contributing landmark or feature in accordance with paragraph 212, while the distinctive vertical presence of St Bride's steeple would be complemented, the proposal consolidating that small cluster of tall buildings around New Street Square.
149. View 12A.2 is orientated south west, and the proposal would have no additional impact.
150. Overall, the proposal would not harm and would make a positive contribution to the characteristics and composition of the strategic view and its landmark elements, including preserving the ability to recognise and appreciate St Paul's as the SIL.

Millennium Bridge and Thames Side at Tate Modern (13A.1):

151. St Paul's Cathedral is the sole SIL, while wider landmarks and contributing features are Millennium Bridge and several Wren church towers and spires which contribute greatly to the wider setting of St Paul's.
152. The visual management guidance identifies the dominance of the bridge and St Paul's, whereby the St Paul's Heights has preserved an appreciation of the Cathedral above cornice line, whilst some tall buildings, including the Barbican Towers, compromise that backdrop (paragraph 225). It recognises how the Heights has led to an unrelenting horizontal emphasis of those middle ground buildings relived by the spires and towers of the City churches (paragraph 226).
153. The proposal would be on the far western periphery of the broad prospect and would not 'crowd' close to St Paul's and would not undermine the visibility or dominance of the Cathedral in accordance with paragraphs 227-29 of the visual management guidance in the SPG. The proposal would not harm the contribution of a landmark or contributing feature, preserving the historic skyline and the juxtaposition of elements including river frontage and landmarks, whilst allowing these to continue to be enjoyed in their context, in accordance with paragraphs 68, 69 and 70 of the SPG.
154. The striking tiered form and silhouette of the proposal would add high quality new architecture which would assist in relieving that 'unrelenting

horizontal'ity' referred to in the SPG.

155. Overall, the proposal would not harm and would make a positive contribution to the characteristics and composition of the strategic view and its landmark elements, including preserving an ability to recognise and appreciate St Paul's Cathedral as the SIL.

View 16 (16B.1 and 16B.2), River Prospect, The South Bank: Gabriel's Wharf Viewing Platform

156. St Paul's Cathedral is identified as the sole SIL, whilst other relevant elements are St Bride's Church and Temple Gardens.
157. The visual management guidance describes the dominance of the River in the foreground, with those buildings on the north side providing a rich and intricate skyline. Reference is made to the subtle transition of scale between the Temples and the more recent commercial development on Fleet Street/Ludgate. It is considered that the proposal would preserve the pre-eminence of the open prospect over the River and skyline presence of the Temples and other Victorian/Edwardian buildings defining the Victoria Embankment. It would comprise an attractive part of the established backdrop of larger commercial/institutional buildings transitioning in scale from that foreground to Fleet Street and the more recent developments around New Street Square. Its attractive tiered sloping form would offer a new high-quality piece of architecture with a skyline presence that would complement the varied layering of the townscape from here and would complement and off-set the striking verticality of the steeple of St Bride's.
158. At some apparent distance away, it is considered that the proposal would preserve the ability to recognise and appreciate St Paul's as the SIL, which would remain the pre-eminent focus, its townscape presence preserved in accordance with paragraphs 280-283 of the LVMF SPG.
159. Overall, the proposal would not harm and would make a positive contribution to the characteristics and composition of the strategic view and its landmark elements, including the ability to recognise and appreciate St Paul's as the SIL.

View 15 (15B.1 and 15B.2), River Prospect, Waterloo Bridge (downstream)

160. St Paul's Cathedral is identified as the sole SIL in this iconic London view and River Prospect, with other landmarks and contributing features including Temple Gardens, St Bride's and the Old Bailey. The River defines the foreground, while the eye is drawn towards Temple Gardens, St Paul's Cathedral and the City Cluster.
161. The proposal would emerge into view during the kinetic experience between 15B.1 and 15B.2. Here it would rise above the foreground buildings enclosing the River in the middle ground, consolidating that lesser coherent cluster around New Street Square. The whole twisted, streamline form of cascading landscaped terraces would contribute a high-quality new piece of architecture in accordance with paragraph 263 of the SPG.

162. The proposed green landscaped terraces would rise out of and complement the foreground foliage of the Victoria Embankment, sloping away from the pre-eminent foreground setting of the River, contributing to the spaces and buildings fronting the River in accordance with paragraph 262 of the SPG.
163. The proposal would not bring a cluster of tall buildings closer to St Paul's, preserving the composition of the view, including the sky backdrop of St Paul's, avoiding a 'canyon effect' and would not dominate the SIL, in accordance with the relevant visual management guidance at 264 of the SPG.
164. The proposal, in baseline and cumulative scenarios, would further screen some of the Barbican tower composition (Shakespeare and Lauderdale), albeit a viewer could still read their skyline presence alongside a new high-quality neighbour. Those landmarks and contributing features would have their settings preserved, including the juxtaposition between elements and the river frontage which would still be enjoyed in their context, in accordance with paragraphs 68-70 of the SPG.
165. Overall, the proposal would not harm and would make a positive contribution to the characteristics and composition of the strategic view and its landmark elements, including the ability to recognise and appreciate St Paul's as the SIL.

View 17 (17B.1 and 17B.2), River Prospect, Golden Jubilee / Hungerford Footbridges (Downstream)

166. St Paul's is the sole SIL, while given the raised and broad panorama here there are many landmarks and contributing features, including St Bride's, the Royal Courts of Justice and the Old Bailey, amongst others. The SPG describes the River as defining the foreground and middle ground, enlivened by Waterloo Bridge and the Embankment trees creating a significant sense of horizontality. It identifies St Paul's as rising above the general townscape, including the City Cluster off to the right, while St Bride's and Old Bailey are identified as distinctive vertical elements seen against sky as are, to the Barbican's trio of towers.
167. The setting of St Paul's, as the singular most important structure, would be preserved in accordance with paragraph 301, the proposal being of an appropriate height, set at some apparent distance from the Cathedral. It would strengthen the sense of a smaller cluster of taller built development around New Street Square, and would have no impact on Somerset House, in accordance with paragraph 302.
168. The proposal would not obscure or detract from a landmark, and would still allow the distinct vertical skyline presence of St Bride's and the Old Bailey be appreciated and, whilst it would slightly reduce the skyline presence of the Barbican tower composition, this could still be read and appreciated, accompanied by a new high-quality neighbour on the skyline. Otherwise the landmarks and contributing features would have their settings preserved, including the juxtaposition between elements

and the river frontage which could still be enjoyed in their context, in accordance with paragraphs 68-70 of the SPG.

169. Overall, the proposal would not harm and would make a positive contribution to the characteristics and composition of the strategic view and its landmark elements, including the ability to recognise and appreciate St Paul's as the SIL.

View 18 (18B.1), River Prospect, Westminster Bridge: The Downstream

Pavement:

170. The River dominates the foreground whilst in the middle ground the prominence of Country Hall and the London Eye capture the view, alongside the Shell Centre in the background. In the wider prospect there is a consistent formal and civic scale character to the buildings enclosing the meander of the River as Westminster transitions to the City. This has a largely consistent but lively skyline datum, relieved by some more vertical built form, such as the fleche of the Royal Courts.
171. The proposed high-quality architectural form comprising the sloping contoured terracing would provide a new attractive silhouette which would contribute to that distant skyline, creating a distinctive vertical inflection appropriate to the wider scale of built form enclosing the River and within the tolerance of that lively skyline datum.
172. The proposal would relate well to the setting of those foreground and middle ground landmarks and would contribute positively to the setting of heritage assets, in accordance with paragraphs 323-24 of the visual management guidance. It would respect and enhance the civic nature of those north bank buildings and would not dominate a landmark or their relationship with the River.
173. Overall, the proposal would not harm and would make a positive contribution to the characteristics and composition of the strategic view and its landmark elements.

**Summary of LVMF Impacts:**

174. The proposal would not harm, and in places would make a positive contribution to, the characteristics and composition of relevant strategic views and their landmark elements. It would also preserve the viewers ability to recognise and appreciate St Paul's Cathedral as the relevant Strategically Important Landmark (SIL). It would ensure that the juxtaposition between elements, including the river frontage and key landmarks, can be appreciated in their wider London context. This is in accordance with Local Plan Policy CS13(1), London Plan Policy HC4, emerging City Plan Policy S13 and guidance contained in the LVMF SPG.

**Other Strategic Views (Local)**

The Monument to the Great Fire:

175. The Protected Views SPD identifies views of and approaches to the

Monument which are deemed important to the strategic character and identity of the City.

Views from the Monument:

176. The proposal would be outside the field of view scope of all the Monument Views except for View 5.

View 5: North West to St Paul's Cathedral – Impact

177. From here St Paul's and St Bride's Church are identified as the Key Features. The visual management guidance at paragraphs 4.12 and 4.13 of the Protected Views SPD identified other features in this panorama as St Mary le Bow, the cupola of the Old Bailey, the BT Tower and St Mary Aldermanry, none of which would be obscured or detracted from by the proposal, their skyline presence undiluted.
178. At paragraph 4.13 it identifies the drum, peristyle and dome alongside the tops of the western towers. At present the dome is on the whole seen rising above a horizon datum to reign pre-eminent on the skyline as the central focus, albeit the drum, peristyle and south west towers are, on the whole, shadowed by taller built development around New Street Square, diminishing the presence of the Cathedral silhouette on the skyline. The proposal would add a significant new element to this backdrop of built development, causing some erosion of clear sky silhouette of the south west tower.
179. As a whole panorama composition, it is considered that the proposals would accord with paragraphs 4.3 and 4.4 of the Protected Views SPD, in that the proposal would not obstruct it, nor would it detract from the general open prospect and those landmark elements as a result of appropriate bulk and massing. Neither would it intrude upon a Key Feature, with the exception of St Paul's.
180. The proposal would result in a small amount of additional erosion the sky silhouette of St Paul's, diminishing its skyline presence, albeit it would still be recognised and appreciated as the central focus and the pre-eminent skyline feature, though it's clarity and integrity slightly eroded, causing a lower level of harm to Monument View 5. This would fail to protect and enhance a significant local view from the Monument, causing a degree of conflict with Local Plan Policy CS 13 and emerging City Plan Policy S13 and guidance contained in the Protected Views SPD.

Views of and Approaches to the Monument:

181. The proposal is not in the defined Immediate Setting of the Monument and would have no impact on those identified views of/approaches to the Monument as identified in the Protected Views SPD.

St Paul's Cathedral:

St Paul's Heights and the Processional Approach:

182. The proposal is not in the defined St Paul's Heights Policy Area.
183. It would be visible in views of the Cathedral on approach from Fleet Street along the Processional Route. The site has a significant

frontage on the northern side of Fleet Street, addressing the Processional Route between Westminster and the City of London to St Paul's Cathedral. The Processional Route is of London and National heritage significance. The viewing experience has been subject to long-term curation as a kinetic townscape sequence and experience in the English Picturesque tradition.

184. It is considered that the proposal would add a high-quality new landmark and skyline presence to the unfolding sequence of the Processional Route townscape experience. It is considered no harm would be caused.

#### St Paul's Cathedral - Views From:

185. The proposal would be visible from the Stone and Golden Galleries of St Paul's Cathedral. The Protected Views SPD seeks special attention be paid to the roofscape surrounding the Cathedral.
186. It would be a prominent new building in the mid-distance when viewed from the Stone and Golden Galleries. It would not detract from the general open prospect of the viewing experience. It would not obscure any important landmark feature or element, those principal aspects along the Processional Route and south west towards Westminster would remain undiluted. As a result of good architecture, the proposal would replace a banal and vapid roofscape with a much a more intricate and inspiring roofscape transitioning of the scale between Fleet Street and New Street Square, resulting in a more interesting roofscape enclosing the Processional Route.
187. It is considered it would preserve the composition and character of these views and would pay special attention to the roofscape, in accordance with the Protected Views SPD.

#### Other publicly accessible elevated viewing areas - Views from:

##### Tate Modern:

188. It would replace an uninspiring and flat roofscape of no townscape value into a contoured and sculpted vertiginous form, enhancing the skyline presence of the cluster of taller built development around New Street Square, comprising an improved backdrop to those heritage landmarks around Fleet Street which would be undiluted. It is considered the character and composition of the viewing experience here would be preserved and enhanced.

##### One New Change:

189. From the public roof terrace, the proposal would be a prominent feature to the north of the Cathedral, which would remain pre-eminent in the foreground. It would not obscure or detract from another landmark and would create an attractive landmark in its own right. The essential character and compositional qualities of this view would be preserved and enhanced.

##### 120 Fenchurch Street Public Garden:

190. Viewed from the western terrace, the proposal would be a prominent new backdrop feature to the north and west of the dome of St Paul's



Cathedral on the distant skyline. The proposal for part of the viewing experience travelling north along the western side of the Sky Garden terrace would slightly erode the sky silhouette of the lantern of St Paul's. This would result in some slight harm to the setting of St Paul's when viewed from here.

## **HERITAGE:**

### **Former Daily Express Building (Grade II\*):**

#### **Heritage Significance:**

191. The former Daily Express Building is of high national special architectural and historic interest and heritage significance.
192. Completed 1932, by Ellis and Clark, with engineer Sir Owen Williams, it is a Fleet Street landmark, with a prominent situation on the corner with Shoe Lane, of four main storeys and three stepped back. It is easy to underestimate, in a world of ubiquitous glazed curtain wall commercial architecture, how radical and daring this would have appeared in 1932. It immediately made its fellow extrovert and neighbouring HQ for the Daily Telegraph, completed 1928, appear twee and out-of-date in comparison, and together they form a striking juxtaposition in the transition from traditionalism to modernity in modern commercial architecture.
193. It is a seminal London example of the Art Deco-inspired 'streamline moderne' style which was then emerging more on the European continent. It is considered to be London's first experiment in glass curtain walling - the origin of the modern City office garb. The facade comprises of mixture of flush black Vitrolite (pigmented glass) and clear glazed panels fixed with chromium strips with matching trimmings, including the distinctive main entrance canopy. The distinctive superstructure of reinforced concrete portal frame comprising a series of tapering posts, beams and cantilevers carrying flat floors.
194. It is a good example of an aspiring leading national newspaper HQ at the heart of the historic Fleet Street press quarter, built during the interwar zenith of competing Newspaper buildings jostling for attention along Fleet Street, to be located at the heart of the Capital between the political (Westminster) and commercial (City) centres. It was the commission of William Maxwell Aiken, first Baron Beaverbrook (Lord Beaverbrook), an influential figure in British media and politics, as the dedicated headquarters offices and printing works for the Daily Express, the largest and most successful mass circulation newspaper in the world. Beaverbrook apparently commissioned a sign during construction to herald the building as 'Britain's most modern building for Britain's most modern newspaper'.
195. It was extended in the 1970s north and east and was known as 'Aitken House', with the extension adopting the guise of the original. In 1997-98, a scheme by John Robertson Architects, praised at the time for its rigorous approach to conservation, saw the demolition of Aitken House and the erection of the current commercial offices known as 'River Court', with a glazed connection and linked internally. As part of this the 6th floor, originally a plant screen in matching guise, was internalised

and a roof terrace placed on top with an extension to the main stair. It also involved the wholesale replacement of the black Vitrolite and clear glass facades. Now infilled, there was once a servicing bay allow carts/trolly buses direct access to the basement print works off Shoe Lane.

196. The interiors were by Robert Atkinson, of which the impressive Art Deco main foyer and original stair core survive with a good degree of integrity, albeit altered and include a dramatic ceiling pendant, exotic chrome detailing such as the writhing chrome snakes either side of the main lifts (now risers), and British sculptor Eric Aumonier-designed relief sculptures representing 'Britain' and 'Empire'. The elliptical stair is of terrazzo with original detailing, including lighting, and doors of the main stair. Otherwise the original interiors either do not exist, or have been masked by a heavy-handed, sometimes oppressive, modern fit out of the office floorplates.
197. It is of high architectural, artistic and historic significance, the result of its architectural appearance, superstructure and original surviving décor.

#### Contribution of Setting:

198. It is considered the elements of setting collectively make a significant contribution to significance and an appreciation of it. The following elements of setting make a contribution in descending order of contribution:
  - Prominent siting of Fleet Street, at the heart of the national conversation, on that national spine between the centre of Governance and commerce. Makes a significant contribution to significance and an appreciation of it.
  - Its brazen modern idiom, in stark contrast to its traditionalist neighbours, and agreement to differ within a recognised tolerance of behaviour, is the essence of the early modern movement in art and architecture, that tension accentuating its architectural effect and juxtaposition. This makes a significant contribution to significance and an appreciation of it.

#### Impact:

199. The impact here would be direct, via the alteration of the asset, and indirect, via change in setting. It is considered the change would be radical, bold and transformative, in the daring spirit of the original building, both preserving and enhancing it. It would do so by liberating it from its annexing and subsuming larger neighbour, giving it a warranted independence and freedom of expression, and greater architectural coherence and integrity. Otherwise, the additional new massing of the detached River Court building would ensure it remained a pre-eminent feature of Fleet Street in the immediate and wider setting. For those detailed reasons below, it is considered the special interest/heritage significance of the Daily Express Building would be preserved and enhanced.

200. Externally, the main architectural move is to detach the Daily Express Building from its larger neighbour, liberating it to be a standalone set-piece on Fleet Street, installing a sense of architectural integrity. Officers agree with Historic England and the 20th Century Society, that this is an enhancement. The proposal would not result in the loss of authentic historic fabric, given the much original fabric was replaced, building on the materials and language of the host to deliver a seamless and organic extension to be read as a whole, including a symmetrical composition to Fleet Street. The new fenestration is to match and is considered appropriate, subject to detail reserved for condition.
201. It is proposed to dismantle and rebuild the sixth-floor plant screen which, whilst a modern addition, is sympathetic. The proposed seventh floor extension, comprising a raised core providing access to the roof level public garden, is proportionate, subservient and in an appropriate matching guise. It would not be visible from the street, preserving the original composition and proportions. The proposed balustrades to the terraces would be lightweight and of appropriate material and appearance subject to detailed condition.
202. In terms of in-direct impact via change in setting, the proposal would enhance that sense of prominent siting on Fleet Street, at the heart of the processional route and former press quarter, enhancing this element of settings significant contribution to significance (setting element 1). It would do so by divorcing it from its larger neighbour, liberating it to form a greater freedom of expression. The scholarly matching of the original curtain wall façade detail would enhance that striking streamline moderne image, whilst the original massing and datum arrangements would be respected, accentuating and sharpening that positive juxtaposition with its more traditional neighbours, enhancing that element of settings significant contribution to significance (key element 2).
203. Some concern has been raised to the height of the new River Court building by Historic England, the 20th Century Society and the Ancient Monuments Society, as a result of change in setting. Officers disagree that harm would be caused as a result of the height, bulk and massing of the new River Court, which has been expressly designed to make a local and macro-level townscape heritage response.
204. On Fleet Street the principal shoulder height and set-back massing of the new River Court building is a direct response to the height, scale and datums of the Daily Express Building, ensuring that in that local Fleet Street context the proposal would not dominate or overwhelm the Daily Express Building in terms of bulk. Comprising two complementary yet contrasting forms, the cantilevering, jettisoning and dynamic form of the new architecture would contrast in a pleasing manner with the simple, sleek unrelieved planes of the Daily Express Building. The adoption of a dramatic curtain-wall façade pays homage to its daring neighbour and that modern spirit of utility and function in honest expression. It draws attention to the Daily Express Building,

both sharing a familial yet independent identity, reinforcing the integrity of the Daily Express Building as a detached and liberated building. The adoption of lightweight floor-to-ceiling glazing and expressive metal spandrels would be built on the streamline moderne character of the neighbour without aping it. It is anticipated that the strips would be a high quality finished finish, of similar appearance to the edge of a 'iPhone', with a tonal contrast to the very distinct jet black Vitrolite of the Daily Express Building.

205. The final architectural detail, materials, finishes, module sizes, jointing and incorporation of servicing will be fundamental to the quality of the final effect, and the details are reserved for condition.
206. In the interior, the principal features of significance, the original foyer and stair core, would be preserved and refurbished. A Condition Survey and associated Schedule of Works for the main foyer and stairs is reserved for condition.
207. The incidental-sounding removal of the non-original net curtains installed by the outgoing occupier on the main foyer fenestration would result in a disproportionately dramatic enhancement of the presence of the interior to the street (albeit a natural consequence of reuse). Minimal intervention is proposed here, and the detail of their refurbishment is reserved for condition, and it is considered that significance would be preserved.
208. Over the remaining original floors, the proposal is also both light-touch but radical. It is proposed to remove later modern building services, including oppressive bulkheads, and to expose and celebrate the innovative and dramatic original superstructure and curtain wall. This would restore a sense of original volume, allowing more natural light to ensure and forming a better relationship with the distinctive curtain wall façade. Subject to final detail reserved for condition, this would be an enhancement.
209. Overall, the proposal would liberate a 'high note' in the lively score of Fleet Street. It would result in a moderate enhancement to heritage significance and the contribution of setting.

### **St Paul's Cathedral (Grade I):** **Heritage Significance**

210. London's and one of the Nation's most famous landmarks, it was London's first Cathedral and one of the earliest sites of Christian worship in Britain, now identified as one of London's two Strategically Important Landmarks, being also the seat of the Bishop of London, the mother Cathedral of the national and international Anglican Church, a ceremonial centre and backdrop of Royal and State ritual and pomp and the final resting place of figures central to the national story, a place of national commemoration and celebration. It is the masterpiece of seminal national figure and architect Sir Christopher Wren (with input from other notable designers and craftspeople overtime) and of the distinct English Baroque-style. It was central to the adoption of

classical architecture in Britain, and symbolic of the restoration of London post Great Fire as a major European political, cultural and economic capital.

211. It is of outstanding national and even international heritage significance. That significance is architectural, historic, artistic, archaeological, evidential and communal (social, commemorative, spiritual and symbolic). This significance is inherent in the iconic architectural form and composition, and in its plan form, fabric and those memorialising fixtures comprising statuette to mausoleums.

#### Contribution of Setting

212. In terms of setting, for hundreds of years it was the tallest building in London. It was strategically sited atop Ludgate Hill, a rare topographical moment in the City of London and one of its highest points, with a commanding position overlooking the River Thames. Following the Great Rebuilding Act (1667), Wren had little influence over even the immediate, never mind wider, setting. This setting has substantially been altered over time, often with the setting of the Cathedral at its heart, and to various degrees those elements together make a substantial contribution to significance and an appreciation of it, in particular the architectural, artistic, historic and communal significance. Those contributing elements of significance are deemed, in descending order of importance:

- Those wider strategic pan-London riparian views from the Thames, its embankments and bridges which are often iconic and London-defining, and where St Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches. These make a substantial contribution to significance and an appreciation of it.
- The ancient processional route of Royal and State national significance along the Strand/Fleet Street, a 'national spine' of pomp and parade, of celebration and contemplation, along a route between the heart of Government in Westminster and commerce in the City, where St Paul's is the pre-eminent culmination/destination of a picturesque sequential townscape experience at the heart of London's and the Nation's identity. This makes a substantial contribution to significance and an appreciation of it.
- Those wider pan-London views and approaches where the dome offers a skyline presence in broad identity-defining London panoramas, for example from those strategic views identified in the LVMF, including Parliament Hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others, some of which are subject to local designations. This includes old and newer high level appreciations of the London skyline which allow the Cathedral to be better understood as part of London's wider natural and cultural topography, including from the Monument and higher level

public viewing galleries such as the Sky Garden at 20 Fenchurch Street, One New Change and emerging viewing terraces in the City Cluster. These make a significant to moderate contribution to significance and an appreciation of it.

- Those more immediate, often incidental, some more planned, townscape appreciations, which have resulted ad-hoc and some active townscape curation over the generations, in particular from St Peter's Walk (south transept axis), Cannon Street, the Paternoster Square development, amongst others, where the Cathedral soars above and dominates its immediate surrounding as the defining skyline presence. This make a moderate/significant contribution to significance and an appreciation of it.

### Impact

213. In terms of the wider riparian setting (setting element 1), from the River, its embankments and bridges, the proposal would in no instance challenge the pre-eminence of St Paul's on the skyline, being of an appropriate scale and set away from it. It would also not obscure or detract from a landmark which contributes to the setting of St Paul's in these views. These impacts are covered in detail under the relevant strategic LVMF views at paragraphs 137 – 174. It is considered the wider riparian setting in pan-London views would be preserved.
214. In terms of the Procession Route (setting element 2), the proposed Fleet Street interface massing follows a compositional form and massing which responds to the prevailing scale and building line of Fleet Street, picking up on the prevalent shoulder datum heights which enclose the vista east towards St Paul's, without impeding on it. At no point would it obscure or detract from the pre-eminence of the unfolding composition or on the skyline presence of the Cathedral this kinetic viewing experience. This element of setting and its contribution to significance would be preserved.
215. The proposal would have a more significant impact on those wider pan-London (higher level) experiences of St Paul's (setting element 3) and the more locally strategic townscape setting (setting element 4). This would manifest in views from the Cannon Street approach, from the Monument Viewing Gallery and from the Sky Garden at 20 Fenchurch Street.
216. The proposal would backdrop an appreciation of the emerging, unfolding composition above main balustrade level comprising south west tower, south transept and dome, on approach via the Cannon Street axis, along Eastcheap (in part) and Cannon Street. On the southern pavement it would be visible between Eastcheap, travelling west, until the junction of Cannon Street and College Hill. From the northern pavement the breach would be localised, around the junction of Cannon Street and Walbrook. This impact has fundamentally informed the massing and modelling of the proposal.
217. On the south side, at the junction with Eastcheap and King William

Street, the south west tower is a distant termination of a deep townscape perspective, whilst the proposal would be distant background and non-prominent, seen also (as atmospheric conditions allow) in association with the top of the BT Tower. Via motion parallax and the unfolding townscape along Cannon Street the proposal would gradually move in behind St Paul's. On arrival at the Bush Lane junction, where the dome emerges into view, the proposal would have moved largely in behind the silhouette, in a recessive manner, its striated rectilinear manner a subservient contrast to the strong verticality of St Paul's picturesque composition of elements. Just beyond the junction with Dowgate Hill, where the full dome silhouette emerges into view, the proposal would move entirely in behind the silhouette, leaving an awesome appreciation of the full composition to define the experience from thereon in until a sublime culmination at St Paul's Churchyard. From that limited interface around Walbrook, the proposal would be somewhat incidental, allowing a full appreciation of south west tower and south transept pediment and statuette.

218. For much of the approach St Paul's is the pre-eminent skyline landmark on what is a rare off-centre townscape axial moment through a strategic City artery, accentuated by the (near) splendid isolation of a towering sky-etched silhouette. This is a rare moment whereby the exquisite open lantern western towers and dome can be seen alongside the pediment and crowning disciples all in a single, coherent and almost gothic picturesque. The central pediment, containing the phoenix rising from the ashes, is well placed, on Wren's orientation of the Cathedral, to pick up morning sun which basks the stone and accentuates the silhouette. The three-dimensional south west tower, which symbolically or not, contains the clocks associated with a bell which reputedly rings only on the death of an incumbent monarch or Lord Mayor, is prominent and helps turn the vista. Whether this symbolic whole was a design-intent of Wren is conjecture - nevertheless the end result is a symbolic townscape moment of strategic importance to the character and identity of the City.
219. The introduction of a new prominent background element would distract from the splendid isolation, causing some eroding of pristine silhouette, causing some diminishment in integrity, authenticity and clarity. The streamline, clean and rectilinear design of the proposed, seen tiering up to a complementary crescendo on the backdrop skyline, would assist in mitigating the impact, introducing a distinct and high-quality architectural neighbour.
220. Overall, the proposal would result in notable, albeit less than substantial, harm, at the lower end of the spectrum, the result of a modest diminishment in the Cannon Street approach which makes a significant contribution to heritage significance.
221. In terms of those pan-London views (setting element 3), the proposal would not undermine an appreciation of St Paul's strategic wider skyline setting from London's broad cityscape panoramas, as discussed in 137 – 174 and in detail in relation to Greenwich Park

(paragraphs 139 – 142).

- 222. However, from the Monument Viewing Gallery the proposal would cause some minor further erosion of the sky silhouette of the Cathedral in views west. The Cathedral here is already somewhat compromised on the skyline and would still be appreciated in the foreground. This would cause some slight harm to the clarity and pre-eminence of an appreciation of the Cathedral from this important higher-level viewing location.
- 223. From the Sky Garden's western terrace, the Proposal would also backdrop the Cathedral. This is a kinetic experience as an observer ascends the western terrace with intermediate landings between the main south and north terrace. The proposal would not block the view of St Paul's and would still allow the observer to readily recognise and appreciate it in relation to that wider topographical setting, including complementary landmarks. However, it would slightly reduce that clarity and skyline presence of the cathedral, with some erosion of the sky silhouette of the lantern, causing negligible harm overall.
- 224. Otherwise it would not obscure or detract from a topographical landmark which contributes to the setting of St Paul's. Overall, the harm would be very slight, in of itself very much at the lower end of less than substantial.
- 225. At One New Change the proposal would rise prominently in the background to the north of the dome silhouette, would be unfettered, and would continue to define the viewing experience. Otherwise it would not detract from a landmark or skyline feature which contributes to the setting of St Paul's and no harm would be caused from here.

#### *St Paul's Conclusion of Impact*

- 226. The proposal, by virtue of its height and presence when viewed from the Cannon Street approach, and to a lesser degree from the Monument Viewing Gallery and Sky Garden at 20 Fenchurch Street, would collectively fail to preserve the significance and setting of St Paul's from those identified local townscape views and higher level pan-London views - elements of setting which make a moderate to significant contribution to heritage significance. This impact is mitigated by the form and detailed design, in particular the distinctive landscaped terrace summit form, which would otherwise deliver a high-quality architectural neighbour.
- 227. Combined, the harm is considered modest and less than substantial, at the lower end of the spectrum, albeit not insignificant.

#### **Fleet Street Conservation Area:**

- 228. The impact here would be direct, as a result of works to the former Daily Express building, which is in the Conservation Area, and in-direct, as a result of change in the wider setting of the Conservation Area.



### Heritage Significance, Character and Appearance:

229. The character and appearance and heritage significance of the Fleet Street Conservation Area is summarised in detail in the Character Summary and Management Strategy SPD (2016), which is a material consideration. It summaries that core significance and character stem from:
- 1.) The focus of Fleet Street, a processional route between Westminster and St Paul's of Royal and State significance since the Middle Ages, and its ceremonial grandeur and commercial bustle created in particular by views of St Paul's Cathedral, St Dunstan's in the West and St Bride's, some of the City most notable ecclesiastical buildings.
  - 2.) The evocative, fine grain network of historic streets, courts, lanes and alleys either side of Fleet Street, and their contrasting intimacy, and which have developed over hundreds of years once developed outside the City walls.
  - 3.) The exceptional richness and variety of architecture of all ages and styles and the contrast between them, ranging from domestic Georgian to monumental 20<sup>th</sup> Century newspaper buildings.
  - 4.) The long association with the press industry and other literary figures such as Dr Johnson and Oliver Goldsmith and of course medieval institutions, namely the Knights Templar, the Whitefriars, the Inns of Court and the legal sector.
230. The Conservation Area is of outstanding local and national architectural, artistic, historical and archaeological significance, drawn principally from the built form and fabric, and to a lesser but significant degree via setting.

### Contribution of Setting:

231. Elements of setting make a significant contribution to significance, and views and vistas deemed integral to that significance are identified in the SPD. The main contribution comes via the below:
- Those approaches and views along the Processional Route, both east and west, towards the Strand and the Royal Courts of Justice to the west and St Paul's to the East (Note Views 1 and 2 in the SPD, for example). This makes a significant contribution to significance and an appreciation of it.
  - Those sensitive strategic riparian broad prospects from the South Bank Queen's Walk which allow an appreciation of the wider skyline of the Conservation Area in a wider London context, in particular as a picturesque ensemble of national monuments and landmarks lining the Processional Route with a skyline presence to London's River. This makes a significant contribution to significance and an appreciation of it.

Impact:

232. Most of the Conservation Area's significance, character and appearance, would remain 'untouched' and undiluted. This is given in particular the tight-knit urban grain and often intimate sense of enclosure, the proposal would have no visual or other influence over much of it.
233. In terms of direct/indirect impact, the liberation of the Daily Express Building as a standalone architectural set piece, divorced from its annexing neighbour, the opening up (visually and physically) of the main entrance and foyer to Fleet Street once more, and the creation of a series of courts/alleys around the Daily Express Building in the vein and tradition of the Conservation Area, would result in a moderate enhancement to significance, overall. The proposed alterations and extensions at roof level would be sympathy, additional bulk not visible at all from within the Conservation Area. The result of the direct impact then is an enhancement to a significant Fleet Street architectural landmark, contributing to those core elements of significance including that rich architectural cornucopia along Fleet Street, whilst enhancing an appreciation of that historic association with the press and reinforcing the characterful fine grain structure.
234. Otherwise, the massing presenting an enclosing façade to much of Fleet Street is of a building line, principal datum and shoulder height which would assimilate with the wider lively jostling of frontages along Fleet Street. In terms of those approaches east and west along the Processional Route (setting element 1), the proposed shoulder height, building line and receding massing, would form an appropriate contextual response to the Conservation Area. It would not obscure or detract from a landmark/monument in either direction on this approach which complements the wider setting of the Conservation Area.
235. For much of the western part of Fleet Street the sloping terraced massing rising to a crescendo further north around Stonecutter Court, would be high-level, often incidental, often glimpsed and peripheral presence in a dynamic viewing experience. In no immediate streetscene context or approach would the proposed additional massing dominate or overwhelm the Conservation Area, whose arresting enclosure and strong, coherent and rich historic context would remain pre-eminent and undiluted.
236. For reasons established at the assessment of St Dunstan in the West as a listed building, the proposal, on approach to the Conservation Area from the Strand, would cause a slight diminishment of the skyline presence of the Church's soaring and elegant gothic tower, eroding it's sky silhouette. As a result, the proposal would result in some slight harm to the Processional Route element of setting and its significant contribution to significance.
237. In terms of that wider riparian setting (setting element 2), Historic England considered that from the South Bank, in particular from LVMF View 16 (Gabriel's Wharf), the proposed would "dominate" the skyline

backdrop of historic areas here (albeit only referring to the Strand (WCC) and Temples Conservation Areas, rather than Fleet Street. It stated the harm was less than substantial, in the middle of the spectrum. Whilst this accusation from HE has been taken very seriously, Officers disagree that harm would be caused as a result of increased height and massing of the River Court building.

238. In terms of those wider riparian views from the South Bank (Queen's Walk), the proposal would, on the whole, not obscure, distract or detract from some of those skyline features of the Conservation Area, in particular St Dunstan in the West and St Bride's, allowing this expression of the Conservation Area to still be read in the context of wider skyline monuments such as the Royal Courts of Justice and St Paul's Cathedral. Where it would interact with the spire of St Bride's it would form a complementary high-quality architectural neighbour which would try its massing in a deferential manner allowing the distinct vertical skyline presence of St Bride's to be preserved. It would take an appropriate place as part of an established backdrop of a modern taller build development off Fleet Street and around New Street Square, adding a high-quality new piece of modern architecture. This element of setting which makes a significant contribution to significance would be preserved.
239. Overall, the character and appearance of the Fleet Street Conservation Area would be preserved. The modest enhancement would be caused to the heritage significance of the Conservation Area as a result of the works to the Express building.
240. However, as a result of a small infringement on the contribution of the skyline presence of St Dunstan in the West to the Processional Route element of setting, the proposal would also result in some slight harm to significance. That slight harm is balanced against the more significant moderate enhancement to the heritage significance of the Fleet Street Conservation Area as a result of the works to the Express.

### **Whitefriars Conservation Area:**

#### **Heritage Significance:**

241. The heritage significance of Whitefriars Conservation Area is covered in detail in the Character Summary and Management Strategy SPD (2016), which is a material consideration. It summarises its significance as stemming from:
- An impressive collection of consistently high quality late Victorian/Edwardian commercial and institutional buildings on land reclaimed and comprehensively planned by the Corporation resulting in a more regular grid plan, a rare more formal townscape in a City context, in contrast to the more organic, evolutionary Fleet Street environs which it abuts.
  - The setting of grand Victorian urban infrastructural, engineering and urban planning interventions, namely Blackfriars Bridge, Victoria Embankment and New Bridge Street.

- An important wider context to the Temples and as foreground to St Paul's Cathedral from sensitive riparian views.
  - A varied assortment of land uses including the former Whitefriars friary precincts, domestic tenements, industrial works and commercial HQs, in addition to a historic association with the press and newspaper production
242. The Conservation Area is of a high level of local and even national architectural, artistic, historical and archaeological significance, drawn principally from the built form and fabric of the Conservation Area and its archaeology, and to a lesser but significant degree via setting.

#### Contribution of Setting:

243. Elements of setting make a substantial contribution to significance, manifesting principally in views across and through the Conservation Area from the River, its embankments and bridges. The main contribution derives from the following in descending order of contribution:
- Strategic pan-London riparian views from Hungerford and Waterloo Bridges and from the South Bank Queen's Walk comprising open river prospects across the City skyline. These make a significant contribution to architectural and historic significance, in particular and an appreciation of it.
  - Views from the immediate environs of the Temples and Fleet Street Conservation Areas, in particular from the Victorian Embankment and south from Fleet Street towards the River which allow for a more enriched appreciation of a wider historic setting. These make a moderate contribution to significance and an appreciation of it.

#### Impact:

244. The Conservation Area comprises land due south of the proposal, sharing no direct visual interaction from inside the Conservation Area. The proposal would not be visible in any identified view in the Conservation Area SPD.
245. The proposal would appear in the near wider setting as part of an established backdrop to the Conservation Area from broad riparian river prospects from the South Bank Queen's Walk. From here Whitefriars and the adjoining Temples Conservation Area command the foreground setting and scale of an open prospect across the River. Their respective pre-eminent skylines would be preserved on the whole. Even where there is a significant interface with the former City School for Boys on the Embankment, its height, and distinctive form and silhouette would complement and be subservient to its distinctive skyline presence.
246. From Hungerford and Waterloo Bridge's, the proposal would assimilate with that mediation of scale between the Embankment and those taller skyline structures on raised land to the north of Fleet Street and would

not dilute or overwhelm the Conservation Area in the foreground. The same applies to those views from the South Bank, where the sculpted tried summit form would make an appropriate response in creating an impressive skyline backdrop to the Conservation Area, mediating in scale as part of a complementary modern backdrop. Setting element 1, wider riparian views, would be preserved.

247. In term of setting element 2, those views south from Fleet Street would be undiluted given the high level and peripheral nature of the proposals in the opposite direction. In term of the approach from the embankment, the proposal would also be a peripheral high-level background feature, even less so when the trees are in leaf, and would preserve an appreciation of the coherence of the immediate historic setting to the Conservation Area. As such, it is considered setting element 2 would be preserved.
248. Overall, the proposal would preserve the contribution made by setting to significance.

### **Temples Conservation Area:**

#### **Heritage Significance, Character and Appearance:**

249. Of ancient origin, the Temples is perhaps the most distinctive City conservation area and has a character that is not only unique to the City, but rarely found elsewhere. It has a restrained, dignified, private and often tranquil character, in pleasant contrast to the bustle of Fleet Street or the Embankment. It comprises an exceptional collection of outstanding buildings as part of a lush open landscape setting comprising the Inner and Middle Temples and the Temple Church. To summarise the outstanding significance of the Temples derives from:

- It has a distinct and venerable legal quarter of ancient origin resulting in a collection of outstanding authentic survivals from the 17<sup>th</sup>, 18<sup>th</sup> and 19<sup>th</sup> Centuries comprising rare legal chambers, domestic quarters and buildings associated with the Inns of Court.
- An outstanding townscape of collegiate character comprising courts, squares and streets, and strong sense of domestic human scale, of complementary architectural styles and materials, all set in the verdant, arcadian setting provided by the Inner Temple Gardens.
- Its connections with the Knights Templars and the focus on the Temple Church, based on one of the holiest places in the Crusader world, the Church of the Holy Sepulchre in Jerusalem, it is one of the oldest and most significant ancient churches in the City.

#### **Contribution of Setting:**

250. Elements of setting make a significant contribution to significance and an appreciation of it, in the form of environmental qualities, in particular views of and through it, but also of wider intangible qualities. In relative order of contribution, those elements comprise:

- Strategic pan-London kinetic views from Hungerford and Waterloo Bridges and the South Bank Queen's Walk looking north and east, where it is seen as part of the Victoria Embankment and as part of the wider skyline. These make a significant contribution to significance and an appreciation of it.
- Those views out of and through the Conservation Area of the sky, in particular when there is limited influence of wider built development, accentuating the self-contained and distinct integrity and authenticity of the Conservation Area ensemble. These make a significant contribution to significance.
- Views into the Temples which act as 'portals' which transition between the bustle of Fleet Street / the Embankment, accentuating the sharp contrasts in character and appearance. The peaceful, restrained and often tranquil intangible qualities of the public realm, and their contrast with the bustle of the City around it, draws on significance. These make a significant contribution to significance and an appreciation of it.

Impact:

251. It is obvious to state that there would be no direct, tangible alteration or change to the physical asset, whose ancient and rare historic fabric would be untouched. For that matter, in most views from within the intimate enclosure and tight-knit grain, the proposals would be imperceptible, the impact being none.
252. As discussed, Historic England represented that the proposal would dominate the historic context when viewed from the South Bank, in particular from Gabriel's Wharf, LVMF View 16 (B1-2). It was stated that the harm is less than substantial, in the middle of the spectrum. Officers disagree and find it hard to understand how a more limited setting impact could allow for what would be significant and serious harm to the Conservation Area if substantiated. Officers consider the impact from LVMF View 16 (Gabriel's Wharf) at paragraphs 156 – 159 and find no conflict with the LVMF.
253. In those kinetic views from the Hungerford and Waterloo Bridge's, and the South Bank between Waterloo Bridge and Blackfriars Bridge, via Gabriel's Wharf, the proposal would be an appropriate backdrop skyline feature, complementing, and reading part of, a collection of taller modern built form in and around New Street Square. The open prospect across the breadth of the River Thames and the arcadian riparian scene created by the enclosing combination of the Victoria Embankment and Temple Gardens would remain pre-eminent. Without undue prominence, the high-quality architecture and tiered landscaped massing would assist the assimilation of the proposal into this scene, whereas it's silhouette would take its place as part of a high-quality backdrop. It is considered that setting element 1, pan-London strategic riparian views, would be preserved.
254. In terms of those views out of and through the Conservation Area

(setting element 2), the proposal would be a limited visual consequence, at high level, almost always incidental and often peripheral to the viewing experience which is commanded by the rich foreground. Where it would be visible, which is from parts of the Inner Temple Gardens, in particular the southern part and south of on the Victoria Embankment, the current backdrops are not at present pristine and it would by no means dominate or overwhelm, and for much of the year when the trees are in leaf would be screened from all but the most focused and glimpsed of views. From those more intimate settings in the Conservation Area, for the vast majority of it, it would not be visible at all. It is considered that setting element 2 would be preserved.

255. In term of setting element 3, the experience of the transitional portals and the intangible qualities of the public realm in contrast with the surrounding bustle of the modern City, it is considered that these would be unaffected and thus preserved by the proposals.
256. Overall, it is considered that the proposal would preserve the heritage significance of the Temples Conservation Area and an appreciation of it, leaving it unharmed.

### **Strand Conservation Area (City of Westminster):**

#### **Heritage Significance:**

257. The Strand Conservation Area incorporates the grand early 20th Century project of improvements to the Strand and the creation of Aldwych and Kingsway, a grand continental style half circus and boulevards defined by formal and robust Portland Stone-faced classical architecture of a civic scale, north towards Lincoln's in Fields, whilst incorporating the ancient Strand, Somerset House and part of the Victoria Embankment and the Royal Courts of Justice to the east. It is of outstanding architectural, historic and artistic heritage significance, considered to principally derives from:

- The central 'national spine' comprising the Strand, an ancient Processional Route of Royal and State significance, lined by its often grand and formal architectures of institutions of state, cultural and commercial significance, with a picturesque townscape with infolding vistas of important landmarks, including the Churches of St Mary Le Strand, St Clement Dane and the Royal Courts of Justice, alongside rich statute of national significance.
- The Victoria Embankment and Waterloo Bridge as remarkable piece of urban infrastructural and planning improvements and the iconic London views they contain.
- Somerset House as a seminal London and landmark of the River Thames and one of the finest survivals of Georgian London.
- The contrast between the larger formal architectural some of the that humbler and more informal architectural from a variety of ages.

258. The Strand Conservation Area Audit SPD is a material consideration.

### Contribution of Setting:

259. Elements of setting from which the Strand Conservation Area can't be divorced make a significant contribution to significance, in particular an appreciation of it. In order of relative contribution these are considered:
- Views into the Conservation Area from west and east in particular, where the Strand itself forms an integral part of a ceremonial processional route of Royal and State significance, part of an unfolding sequential townscape national monuments and landmarks. This makes a significant contribution to architectural and historic significance.
  - More incidental and formal views from the immediate streetscape on approach from the south (the Embankment) and the north (Covent Garden/Holborn). This makes a moderate contribution to architectural and historic significance.
  - Those pan-London riparian views from the River Thames, its embankments and bridges, including identified strategic LVMF views from the South Bank, Gabriel's Wharf, Waterloo, Hungerford and Westminster Bridges (downstream). These make a moderate contribution to architectural and historic significance.

### Impact:

260. As discussed in the sections of St Mary Le Strand and St Clement Dane, these form part of an emerging skyline along the Processional Route. For the reasons established there the proposals diminishing, contoured architectural form would provide a complementary juxtaposition in this townscape sequence, which would not obscure or detract from that picturesque townscape experience. It is considered the proposal would preserve this element of setting.
261. The proposal would have no influence on those more incidental or formal localised townscape views through the Conservation Area and this element of settings contribution to significance would be preserved.
262. In terms of setting element 3, HE in its letter identify a single impact on significance, when viewed from LVMF View 16B.1, from Gabriel's Wharf (assessed also at Strategic Views), from where it said the proposal would be an appreciable increase in scale which would tip the balance between low scale traditional buildings plus parkland and modern backdrop buildings. It is said that the increase in scale would tip an balance currently in favour of the foreground of river, parkland and low scale buildings, with harm arising from a significant new skyline development which would undermine that balance, with the proposal said to dominate the skyline. It is then said that a reduction in scale could mitigate harm which it is believed is less than substantial harm in NPF terms, in the middle of any 'spectrum'. Officer have given this considered consideration and weight and are not of the opinion there would be harm.
263. The proposal would be seen as a high-quality new backdrop skyline



addition, consolidating and read as part of an established backdrop of taller modern built development, whilst the rich and strong character of the historic foreground defining the River would remain pre-eminent. The skyline presence of the Strand Conservation Area would be appearing at a significant distance to the west of the proposal and would not be obscured or detracted from. Otherwise, for reasons established under the Strategic Views section, the proposal would not cause harm to those wider riparian views from the Thames and its embankment, Waterloo, Hungerford or Westminster Bridge. Overall, it is considered that setting element three's contribution would be preserved.

264. Overall, it is considered the proposal would preserve the heritage significance of the Strand Conservation Area as a result of change in the setting.

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

#### **Heritage Significance:**

265. The character and appearance and heritage significance of St Paul's Cathedral Conservation Area is summarised in detail in the Character Summary and Management Strategy SPD (2013), which is a material consideration. It summarises that significance as stemming from:

- A focal point in the CoL of international significance and the cumulation of the Processional Route of Royal and State significance since the Middle Ages, a focus of national celebration, with strong associations with nationally significant culture, events and persons.
- The immediate setting to St Paul's, of international architectural and cultural significance and long-established site of Christian worship, including important related archaeology.
- A significant concentration highly significant architecture, predominantly masonry in traditional styles, from all periods, alongside a visual character and groundscape enriched by a wealth of historic monuments, sculpture and other public realm structures.
- A varied urban grain and townscape from tightly knit historic streets and alleys to open spaces around St Paul's.

266. The Conservation Area is of outstanding local and national architectural, artistic, historical and archaeological significance, drawn principally from the built form and fabric of the Conservation Area, and to a lesser but significant degree via setting.

#### **Contribution of Setting:**

267. Elements of setting make a substantial contribution to significance, and views and vistas deemed integral to that significance are identified in the SPD. The main contribution comes via the below:

- The Processional Route approach from Fleet Street and the related townscape experience and views east on approach to the Conservation Area. This makes a substantial contribution to the significance of the Conservation Area.
- Wider strategic pan-London riparian Thames-scape views from around the banks of the River Thames, in particular from the South Bank Queen's Walk. These make a substantial contribution to significance.
- The approach to St Paul's from Cannon Street carved out in the mid-19<sup>th</sup> Century (note View 20 in the SPD). This makes a significant contribution to significance.
- More immediate, even intimate, local townscape views/vistas, either planned or fortuitous, on those secondary approaches to the Cathedral from the north, south and east (Note for example Views 16, 17 and 21 of the SPD). These are considered to make a moderate contribution to overall significance.
- Higher level viewing locations of the Conservation Area, including St Paul's Cathedral, in its wider natural and cultural topographical London-wide setting. These make a modest contribution to significance and an appreciation of it.

Impact:

268. The proposed Fleet Street shoulder height would seamlessly assimilate in the subtle variance of datums and lively rhythm of Fleet Street and would not obscure or otherwise detract from the Processional Route or the relevant landmarks culminating in St Paul's. Any additional bulk would be high level, fleeting and peripheral to this rich and dynamic experience so that this element of setting would be preserved.
269. As discussed, the proposal would make a positive architectural contribution to the backdrop skyline setting of those historic contexts which provide the pre-eminent foreground setting to the Cathedral when viewed in those kinetic, dynamic pan-London river prospects from the South Bank. This element of setting would be preserved.
270. As established above the proposal would dilute a relatively pristine pre-eminence of the sky-etched compositional silhouette of St Paul's comprising south west tower, south transept and dome, when approached from Cannon Street. This is a principle approach to St Paul's, at the heart of the Conservation Area. It would result in modest harm to this element of setting and its contribution to the significance of the Conservation Area.
271. As established, the proposal would not harm or distract from those wider strategic pan-London riparian views from the South Bank Queen's Walk, where the Conservation Area provides the foreground setting to the Cathedral, which would remain pre-eminent. This element of setting would be preserved.
272. In terms of those immediate, often more intimate or incidental views of

the Cathedral in the surrounding Conservation Area, the proposal would exert little influence. It would not be visible at all in Views 16, 17 and 21 of the SPD. It would be part of a more distant backdrop in views St Paul's Churchyard, in front of the imposing west front. From here, it would be peripheral to the experience. The proposed tired summit of the proposal would interface with Wren's tower and spire of St Martin's in kinetic, rather transitory, views from St Paul's Churchyard, where it would remain subservient and provide a complementary architectural backdrop to the church. It is considered that no harm would be caused to this element of setting.

273. The proposal would result in some modest harm to the Cannon Street approach to the Conservation Area, which makes a significant contribution to significance. It would otherwise preserve those elements which make up the substantial contribution of setting, in particular the Processional Route and strategic riparian and other local views.
274. Finally, as established the backdrop and erode the skyline setting of the Cathedral in views from the Monument Viewing Gallery and the Sky Garden at 20 Fenchurch Street. The impact is slight harm, a subtle reduction in pre-eminence of the Cathedral in the context of the Conservation Area from these views.
275. Overall, accounting for the Conservation Area as a whole, the proposal would result in slight, less than substantial harm, at the very lower end of the spectrum.

Former Telegraph Building, Fleet Street (Grade II):  
*Heritage Significance:*

276. Purpose-built HQ of The Telegraph newspaper from the heyday of Fleet Street when it was synonymous with the press. Dated 1928, by Elcock C. Sutcliffe and Thomas Tait, it comprises a Fleet Street landmark at seven storeys tall, faced in Portland Stone in a striking fusion Art Deco with exotic flourishes, including Egyptian detail representative of the hype around the discovery of Tutankhamun's tomb just previous. It has good carved allegorical and figurative relief of primitive heads representing 'The Past' and 'The Future' by Samuel Rabinovich.
277. It is of a high level of architectural, artistic and historic significance.

*Contribution of Setting:*

278. Elements of setting make a significant contribution to significance and it is considered this derives from, in descending order of contribution:
  - Prominent siting on Fleet Street, at the heart of the national conversation, on that national spine between the centre of governance and commerce as part of a grouping of competing historic national press HQs. Makes a significant contribution to significance and an appreciation of it.

- Its bold Art Deco Neo-Egyptian style and scale in stark contrast humbler, more restrained smaller neighbours, accentuating the sharpness in juxtaposition between both. This makes a significant contribution to significance and an appreciation of it.

*Impact:*

279. In easterly views of the listed building from Fleet Street, the proposed building would be largely screened by the listed building, with only a small amount of the diminishing upper parts visible to the north as well as the new Fleet Street frontage. It would be seen as a high-level backdrop feature in the context of the former Telegraph building being a dominant foreground building enclosing Fleet Street. In westerly views from Ludgate Hill and Circus, the frontage of the listed building would appear as part of the merry ensemble along Fleet Street, while the proposed building would terrace back from this in a manner which would not impinge upon the listed building.
280. The proposed building would preserve the special architectural and historic interest of the listed building and the contribution made by setting.

St Bride's Church (Grade I):

*Heritage Significance:*

281. Church of 1671-8 by Sir Christopher Wren with spire of 1701-3, one of Wren's tallest and comprising five octagonal stages of diminishing height. The spire is one of the most distinctive and memorable on the city's skyline, appreciated from within and outside of Fleet Street Conservation Area. The skyline presence when viewed from the bridges and banks of the Thames makes a significant contribution to significance, especially where the spire can be seen as part of the romantic historic skyline around the Temples to Blackfriars and in association with St Paul's. The church was gutted in the Blitz and restored by Godfrey Allen in 1957. The associated excavations by Professor Grimes in 1952-3 comprised the first complete archaeological investigation in England of a parish church. They revealed that the site of the church had been in use since the Roman period.
282. It is of outstanding national architectural/aesthetic, artistic, historical, archaeological and to a lesser extent communal significance.

*Contribution of Setting:*

283. Elements of setting make a significant contribution to architectural and historic significance, in particular an appreciation of it. In relative order of contribution, it is considered that this derives from:
  - Pan-London broad riparian views from the River Thames, its embankments and bridges, including strategic LVMF River Prospect views from Waterloo Bridge, Gabriel's Wharf, Hungerford Bridge

Southwark Bridge and London Bridge, where it can be appreciated as a landmark steeple atop the rising banks of the Thames, denoting the processional route and seen in complementary juxtaposition with Wren's masterpiece, St Paul's. These make a significant contribution to architectural/aesthetic and historical significance.

- Local, often glimpsed, sudden and fleeting local views from Fleet Street, St Bride's Avenue, Bride's Passage and Bride Lane allow for the full force of Wren tower and steeple to be appreciated in an intimate townscape context conjuring the sublime. This makes a moderate contribution to architectural and historic significance, especially an appreciation of it.
- The local topography and change in levels which allow for an appreciation of the burial site and it marking a climb from the riverside making a modest contribution to architectural/aesthetic, historical and archaeological significance.

Impact:

284. At no point would the proposals interface and obscure an appreciation of the distinctive steeple in those designated strategic LVMF River Prospects. In dynamic, kinetic views from the South Bank, the proposed 'modern steeple' summit form would offer a brief backdropping interface with St Bride's for a moment outside the Oxo Building, where a minor eroding of sky-etched silhouette would be accompanied by a coherent architectural juxtaposition of forms on the skyline, enhancing an appreciation of both.
285. Whilst no existing local view would be changed, the proposal would create a new, prominent north-south route off Fleet Street with a characterfully vernacular off-axis vista terminating on St Bride's tower, utilising its dramatic architecture in a new landmark view conjuring a sense of the sublime. This would enhance those local views which contribute to significance.
286. Overall, the proposal would preserve and deliver a slight enhancement to the setting and significance of St Bride's Church.

#### St Martin's Within Ludgate Church (Grade I)

##### *Heritage Significance:*

287. Of Medieval origin, it was rebuilt following the Great Fire, by Wren's office, 1677-1703. Of the preferred Portland Stone, it is unusually embedded in the built-up street frontage and is famed in particular for its distinctive lead-clad octagonal cupola and slender tapered spire. It stood adjacent to the Medieval Lud-gate, the westernmost of the City's Roman/Medieval Walls, in the awe of St Paul's Cathedral. It is the subject of discussion around the Wren's intention for the spire as part of an evolving design of the rebuilt St Paul's Cathedral, with which it shares a strong architectural and historic relationship. The interior contains original and historic fixtures and fittings, including work by

Grinling Gibbons, which makes a significant contribution to significance.

288. It is of outstanding national architectural/aesthetic, artistic, historical, archaeological and to a lesser extent communal significance.

*Contribution of Setting:*

289. Elements of setting make a significant contribution to the architectural/aesthetic, artistic and historic significance. In relative order of contribution, it is considered that this derives from:

- Views from the processional approach to St Paul's, of Royal and State significance, as part of a picturesque, unfolding townscape experience in which Wren's fine spire offer an architectural 'foil' and 'dances' around the principal west front composition. This makes a significant contribution to significance and an appreciation of it.
- Views from in and around St Paul's Churchyard in which there is an architectural and historical relationship with St Paul's make a modest contribution to significance and an appreciation of it.

*Impact:*

290. As discussed, the taller building would comprise a tiered massing stepping back from an appropriate shoulder height picking up on the lively but neighbourly rhythm of datums along Fleet Street, successfully scaling into the streetscene. It would seamlessly knit into the prevailing enclosure of Fleet Street and would not detract from an appreciation of the unfolding 'Wren-scape' focused on St Paul's and St Martin's spire, which would be undiluted. This significant setting contributor to the significance, the processional route, would be preserved.
291. The proposed taller building would have a (relatively) limited townscape 'moment' where it would interface with the spire from St Paul's Churchyard (south side), taking part in a rich and varied scene. Whilst it would cause a minor infringement of sky silhouette, though would comprise a subservient, recessive backdrop element, whose tapered summit would establish a complementary architectural form and foil to the punchy verticality of the spire. Thus, this contributing element of setting to significance would also be preserved.
292. Overall, the Proposals would preserve the setting and significance of St Martin's Ludgate.

St Andrew's Church, Holborn (Grade I)

*Heritage Significance:*

293. Church, formerly mid-fifteenth century, ruinous and dilapidated by the time of the Great Fire which it escaped. Nevertheless, it was rebuilt to the design of Sir Christopher Wren in 1686-7, preserving the fifteenth century tower which Wren refaced in 1703-4. The building was damaged by bombing in the Blitz and restored by Seeley and Paget. As well as these architects, the church has associations with a number of

important historical figures such as former Prime Minister Benjamin Disraeli, who was baptised there in 1817, and James Somerset, the former enslaved African who was central to the significant legal ruling in 1772 that slavery lacked a firm foundation in English law. Archaeological excavation has revealed evidence for Roman use of the site and a timber church is documented on the site in 959.

294. It is of outstanding national architectural/aesthetic, artistic, historical, archaeological and to a lesser extent communal significance.

*Contribution of Setting:*

295. Elements of setting make a significant contribution to the architectural/aesthetic, artistic and historic significance. In relative order of contribution, it is considered that this derives from:

- Views of the church and churchyard from the north, west and south, in which it is seen as a group with Holborn Viaduct, Shoe Lane Bridge and the City Temple (the latter grade II listed) and S.S. Teulon's grade II listed Court House, Rectory and Vestry Clerk's complex of 1868-71. These immediate elements of setting make a high contribution to the significance of the church.
- To the north, the tranche of historic townscape in the London Borough of Camden, comprising Hatton Garden and Ely Place, makes a medium contribution to the significance of the church.
- Otherwise, the setting of the church is now characterised by large office developments which make a neutral contribution to significance.

*Impact:*

296. In short views from Holborn Circus the proposed development would appear as a sliver on the skyline above the existing modern buildings to the south of the church. In longer views from the north, the upper tip of the proposed development would begin to appear above the nave; in longer views looking south from Ely Place, the proposed development would begin to appear in the gap of clear sky between the church tower and the existing mass of Plumtree Court. Nevertheless, the historic form of the church would continue to be clearly legible against a backdrop of modern architecture, with an interesting fission between the two, of two complementary vertical forms.
297. The proposals would preserve the significance and setting of St Andrew Holborn.

St Dunstan in the West Church (Grade I):

*Heritage Significance:*

298. Church dating from 1830-3 by John Shaw senior and has a Ketton stone Gothic tower in the Gothic style and is surmounted by an octagonal stone lantern. Occupying the site of a church first attested in c.1170, the building incorporates monuments from the earlier church

and statues and masonry from the nearby Ludgate, demolished in 1760 for road widening, including of Queen Elizabeth (c.1586) and King Lud and his Sons. The church's date, architectural form and surviving monuments are rare in a City context. So too is the octagonal lantern with its delicate Gothic tracery. This is a significant presence on the local Fleet Street skyline when viewed from east and west – forming part of the Processional Route from St Paul's Cathedral to Westminster Abbey – and it is identified in the Protected Views SPD as a City church considered to have presence on the wider skyline.

299. It is of outstanding national architectural/aesthetic, artistic, historic and to a lesser extent communal significance.

*Contribution of Setting:*

300. Elements of setting make a significant contribution to the architectural and historic significance. In relative order of contribution, it is considered that this derives from:

- Views on approach from the West, from the Strand, and from the east, along Ludgate Hill, Ludgate Circus and Fleet Street. St Dunstan's, with St Brides and the Royal Courts of Justice are key connected landmarks and their lofty spires are prominent above the varied eclectic Fleet Street townscape experienced along Fleet Street as well as from the River. This wider setting with other landmarks contributes to their overall architectural and historic significance. This makes a significant contribution to significance.
- Pan-London riparian views from the South Bank Queen's Walk which it contributes to that wider historic setting of the Temples and Fleet Street making a moderate contribution to significance.
- Fleeting glimpses in the courts and alleys north of Fleet Street making a modest contribution to significance.

*Impact:*

301. The distinctive tower emerges into prominent view from the environs of St Clement Danes, forming part of a rich and exciting Victorian spire-scape in union with the intricate skyline of the Royal Courts of Justice, which steals the show. In higher level and transient view, the proposed tiered architectural massing backdrop the sky silhouette of the dramatic tower composition, encroaching on the pre-eminence of the tower and its contribution to the wider roofscape.
302. Otherwise it would have little influence over its setting on approach from east or on those strategic riparian views from the South Bank, causing no harm to these elements of setting.
303. Overall, harm would be caused via a setting impact on approach from the west along the Strand. That harm would be less than substantial, at the lower end of the spectrum.



### Church of St Clement Dane (Grade I):

#### *Heritage Significance:*

304. Church of 1680-82 by Sir Christopher Wren, reusing but refacing fifteenth century masonry of the west tower, with a spire of 1719 by James Gibbs. The building is therefore a work of two of the outstanding architects of the age. It was heavily damaged by bombing in World War Two and restored by W A S Lloyd in 1955. Upon re-consecration the church became the Central Church of the Royal Air Force. It is of Portland Stone in Wren's characteristic English Baroque manner, with an elegant steeple with a skyline presence. Restored interior with broad tunnel vault, galleries and groin vaulted aisles, the latter, uniquely in a Wren church, being continued as ambulatory round east end with further semi-domed apse added
305. It is of outstanding architectural, artistic, historic and archaeological heritage significance, on the whole contained in the external and internal physical fabric, but with a substantial contribution from setting.

#### *Contribution of Setting:*

306. Elements of setting make a substantial contribution to the architectural and historic significance. In relative order of contribution, it is considered that this derives from:
- An important architectural and historic landmark on the Processional Route with a prominent central position on the Strand, where it is appreciated as an important part of the 'pomp' and ceremony of this route with a skyline presence. This makes a substantial contribution to significance and an appreciation of it.
  - Wider pan-London riparian skyline views from as far west as Westminster Bridge and also from the South Bank and Waterloo Bridge. These make a significant contribution to significance and an appreciation of it as part of central London's historic skyline.

#### *Impact:*

307. The proposal would provide a prominent, at least more so when the trees are not in leaf, on approach from the west (travelling) east along the Processional Route of the Strand. The distinctive, attractive and high-quality summit form and 'crescendo' of the would form a complementary backdrop neighbour to these sequential, unfolding piece of architectural theatre. At no point would it erode the prominent sky silhouette of the church tower and would read subservient to it as the commanding presence moving into foreground view via motion parallax. The proposal would not affect views of the Church on approach from the east along Fleet Street. The proposal would preserve the emerging views of the Church from the Processional Route, leaving this element of settings contribution to significance unharmed.
308. The steeple's skyline presence in those wider pan-London riparian strategic views from the River, its embankments and relevant bridges,

the second element of setting contributing to significance, would be preserved. At no point would the steeple be obscured, or detracted from, by a proposal set at some distance from it in these views.

309. Overall, the proposal would preserve the special architectural and historic interest, heritage significance and setting of St Clement Dane as a result of change in setting.

Church of St Mary Le Strand (Grade I):

*Heritage Significance:*

310. Church, of 1714-17, by renowned Georgian architect and landscape designer, James Gibbs, thought to reflect his experience in Rome, whilst paying tribute to Wren. It is of Portland Stone and is symmetrically composed with a tower and steeple rising in 3 diminishing open stages with aedicules in elegant Corinthian order and distinctive Wren-like flaming urns. It has a main west front, exceptionally situated on a central island commanding the vista west along the Processional Route of Royal and State significance, and an important part of an unfolding, sequential townscape setting of rare London formality, but in the English Picturesque tradition.
311. Aisleless interior with the apse framed by superimposed orders of coupled columns and coupled columns carrying balcony over west door. Panelled walls with pilasters to upper register and coffered ceiling.
312. It is of outstanding architectural, historic, artistic and archaeological heritage significance, on the main contained in the physical fabric of the exterior and interior, but with a substantial contribution from setting.

*Contribution of Setting:*

313. Elements of setting make a substantial contribution to the architectural and historic significance. In relative order of contribution, it is considered that this derives from:
- An important architectural and historic landmark on the Processional Route with a prominent central position on the Strand, where it is appreciated as an important part of the 'pomp' and ceremony of this route with a skyline presence. This makes a substantial contribution to significance and an appreciation of it.
  - More limited glimpses the steeple from Waterloo Bridge and the Queen's Walk, in particular where this is seen in complementary architectural juxtaposition with Somerset House in the foreground. This make a moderate contribution to significance and an appreciation of it.

*Impact:*

314. Would have a transient impact on the kinetic approach towards the church from the northern pavement of the Strand resulting in a transient, even fleeting, erosion of a sky-etched silhouette below

shoulder height of the principal composition. It would appear at some distance as a backdrop feature to the Church, which would remain pre-eminent in the foreground. It would be read in context of the unfolding layers of monumental institutions of state and commerce which characterise the viewing experience of the Processional Route, where there is interactions of the steeple with other skyline features such as the Deloitte Building (New Street Square) and the Royal Courts of Justice. At no point would it challenge the steeple silhouette. This principal contributing element of setting to significance would be preserved.

315. Those more limited glimpses of the steeple, including in association with Somerset House, from the River, Waterloo Bridge and the South Bank, would not be obscured or detracted from, preserving this element of settings contribution to significance.
316. Overall, the proposal would preserve the special architectural and historic interest, heritage significance and setting of St Clement Dane as a result of change in setting.

### **Other Designated Heritage Assets**

317. The definition of setting is the extent to which an asset is 'experienced', which is not geographically set and can change over time, relating to more than just a direct visual influence. Given the dense central London location, the site is within the setting of an enormous amount of heritage assets, and it would be disproportionate to assess them all. As part of a scoping exercise, this assessment is in accordance paragraph 194 of the NPPF and is deemed proportionate and no more than is sufficient to understand the potential impact on significance. In accordance with paragraph 195 we scoped a great number of potentially affected assets accounting for the evidence and necessary expertise. This included:
  - The Royal Courts of Justice (Grade I),
  - the Punch Tavern (Grade II),
  - the Old Bell Public House (Grade II),
  - 90-94 Fleet Street (Grade II),
  - 80-81 Fleet Street (Grade II),
  - 9 Salisbury Court (Grade II),
  - Mersey House (Grade II),
  - 143-144 Fleet Street (Grade II),
  - Ye Olde Cheshire Cheese Public House (Grade II),
  - 146 Fleet Street (Grade II),
  - Tipperary Public House (Grade II),
  - former Glasgow Herald Office (Grade II),
  - 49-50 Fleet Street (Grade II), amongst others, including all the various listed building which substantially comprise the Temples, Whitefriars and Strand Conservation Areas where the proposal could be seen in setting.

318. The settings and the contribution they make to the significance of the listed buildings, would not be adversely affected by the proposals due to the relative distance of the proposal where it would not appear unduly prominent, would not impact on the roofscape silhouette of the listed buildings and existing built fabric blocking the view of the proposed development in the backdrop. The proposed development would not harm the setting or the contribution that the setting makes to the significance of these listed buildings.
319. The assets assessed in detail here are considered sufficient to understanding the impact on significance. Where it is deemed there would be no harm to the assets above then there are no material differences with other related or nearby heritage assets which would have drawn a different conclusion.

### **Archaeology**

320. The site is in an area of archaeological potential, to the west of the Roman and medieval walled City and to the north of the main route to the west, now modern Fleet Street. It is close to a known Roman cemetery.
321. The proposed development would retain the existing two-level basement and reuse existing foundations. The basement slab would be reinforced in the central area to take the proposed new structure. In the northern part of the site the existing basement slab would be replaced.
322. Archaeological excavation was carried out on the site prior to construction of the existing building and an Archaeological Status Report has been submitted with the application. The report examines the findings of the previous work on the site and concludes that no archaeological remains would have survived due to the depth of the existing basements and foundation construction and that it is highly unlikely that any cut features would have survived.
323. The proposed development is considered to have no impact on archaeological remains and an informative is recommended in the event that any changes to the development are proposed, a potential archaeological impact is considered.

### **Cultural Strategy**

324. Adopted Local Plan policy CS11 seeks to provide, support and further develop a wide range of cultural facilities and events in the City. Policy S6 of the draft City Plan 2036 seeks to enhance cultural experiences and access to a range of arts and heritage. The policy requires developers to submit Cultural Plans for major development outlining how the development will contribute to the enrichment and enhancement of the City's inclusive cultural offer. These should set out how the development will contribute towards enriching and enhancing the City's cultural offer for example by incorporating cultural activities or

displays in ground floor spaces; facilitating public access and providing exhibitions/interpretation boards in relation to matters of historic interest; providing permanent or temporary space for creative enterprises; and incorporating public art either within the design of the building or as freestanding structures.

325. A Cultural Plan has been prepared for the proposed development which outlines a strategic framework for the cultural use and activation of 120 Fleet Street, encompassing both the Daily Express Building and the River Court building, as well as a cultural space operator model that will interface with programming partnerships developed with local cultural stakeholders within the City and wider London.
326. The Cultural Plan proposes to open up the Daily Express Building to the public with event and exhibition space in the basement, interpretation of the building's history and exhibition displays in the ground floor lobby, uses complementary to the cultural uses on the 2nd to 4th floors, a café/bar and creative artisan's shops on the 5th floor and exhibition space on the 6th floor, as well as a publicly accessible rooftop.
327. The submitted Cultural Plan sets out the initial direction of travel for the cultural use and activation of the development. It states that the site's programme retains the principles of free access at the point of entry and accessibility at its core. The public benefits of the site and wider site include: Rejuvenation of the Grade II\* Daily Express Building as a publicly accessible cultural destination, with complementary uses and a landscaped public roof garden, an improved public realm including new pedestrian routes through the site and increased pavement widening on Fleet Street which improves pedestrian movement and comfort, increased active ground floor frontages providing flexible retail, promotion of active travel through the delivery of a prominently located Cycle House, contributions towards further public realm improvement works to St Bride Street secured through the S278 agreement, use of off-site consolidation centres to minimise vehicle movements, delivery of a Cultural Implementation Strategy which would provide details on how further consultation and delivery plans would be adopted which is secured via a S106 agreement, delivery of an exemplar new office building demonstrating high sustainability credentials, high standards of architecture and design which provides high quality internal and external environments which embed health and wellbeing through the provision of unique south facing landscaped external amenity terraces for office occupiers.

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

### **Cycling**

328. 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.

329. The proposed level of cycle parking is compliant with the London Plan, as is shown in the table below.

London Plan long stay cycle parking	Proposed long stay cycle parking	London Plan short stay cycle parking	Proposed short stay cycle parking
1029	1037	85	85

330. The cycle parking for the new office building would be accessed from St Bride Street via a new cycle house. The cycle house would occupy a prominent location adjacent to the St Bride Street office entrance, enhancing the visibility of the cycle parking and celebrating cycling as a mode choice. The entrance to the cycle house would be conveniently located towards the bottom of the St Bride Street frontage and be well linked to the nearby cycleway 6 running along New Bridge Street and Farringdon Street.
331. 234 parking spaces would be located within the cycle house at ground floor level, comprising the 85 short stay cycle parking spaces and 149 long stay cycle parking spaces. A mix of cycle parking would be provided, including 106 spaces in an automated 'Velominck' cycle parking system, 78 folding bicycle lockers, 30 spaces provided by Sheffield stands and 20 spaces for larger adapted bicycles. The provision of the automated cycle parking system is a welcome innovation as a space efficient solution.
332. Spaces within the cycle house would be free to use for the general public. Access to the automated cycle parking system and the space for larger bicycles would be managed by a concierge. The concierge desk would be open during the building's public opening hours to ensure this cycle parking is accessible when required. Further detail on the operation of the concierge desk will be provided in the cycling promotion plan, which will be secured by a S106 obligation.
333. 882 long stay cycle parking spaces would be provided at basement level. Access to the cycle parking would be provided via two lifts and a staircase from the Cycle House at ground floor level. A mix of cycle parking would be provided, including 664 spaces on two tier racks, 93 spaces provided by Sheffield stands, 57 spaces provided by raised wheel/ wall mounted stands, 42 spaces for folding bicycles and 32 spaces for larger adapted cycles.
334. 5% of the cycle parking spaces are accessible for larger adapted cycles and this arrangement would be secured by planning condition in line the London Plan Policy T5 (Cycling), the London Cycling Design Standards 8.2.1, and the draft City Plan 2036.
335. The proposals include 90 showers, and 1029 lockers at basement level

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. The proposals do not meet the London plan recommendations for the number of showers. The applicant has demonstrated that the number of showers can be increased, however the access and circulation would be worsened. These would represent an important part of a cyclist's experience of using the facilities and on balance the number of showers is considered acceptable. The proposed number of lockers exceeds the London Plan recommendations.

336. The applicant would be responsible for promoting the use of the cycle parking spaces through a Section 106 obligation to produce a Cycling Promotion Plan, which would be a cycling focused Travel Plan. The Cycling Promotion Plan would include details of how visitors to the office can access internal cycle parking. It would be submitted to the City for approval in line with London Plan Policy T4 (Assessing and mitigating transport impacts).

### **Vehicular Access**

337. 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.
338. The development would be car free except for 2 blue badge car parking spaces that would be provided at the basement level 2. Occupants and visitors to 120 Fleet Street and the Daily Express Building would have access to this parking space. 24-hour access to the blue badge parking spaces would be provided.
339. The proposed development would be policy compliant in respect of the proposed car parking arrangement and would represent an improvement on current circumstances as the existing 27 car parking spaces would be removed.

### **Servicing and Deliveries**

340. 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.
341. The servicing of both the office building and the Daily Express Building would take place off-street accessed from Shoe Lane. Vehicles would access the servicing area via two vehicle lifts, one for vehicles entering and one for exiting. The lifts would take vehicles to and from the second basement level where the servicing area is proposed. The servicing area would accommodate 3 vehicles up to 8m in size. The servicing area would provide space for vehicles to manoeuvre and enter and exit the vehicle lifts from Shoe Lane in a forward gear.
342. The servicing area would be equipped with electric charging points for delivery and servicing vehicles. This will be secured by condition.

343. Access for cargo bike deliveries is provided from St Bride Street within the cycle house. These goods would be received by the concierge desk within the cycle house.
344. 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.
345. The applicant is proposing to use an off-site consolidation centre in order to reduce the number of deliveries to the development per day. The applicant has agreed to a cap of 70 deliveries per day. A requirement to use off-site consolidation and the cap on daily vehicle numbers will be secured in the Section 106 agreement.
346. 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 for both parts of the development.
347. The submission of a delivery and servicing plan, further detailing how deliveries would be managed to reduce their impact on the surrounding highway network, would be secured in the Section 106 agreement.

### **Waste Collection**

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

### **Public Transport**

350. 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 Blackfriars and Chancery Lane underground stations and City Thameslink, Blackfriars and Farringdon national rail stations. The site is close to several bus routes running close by on Fleet Street and Farringdon Street.
351. The submitted transport assessment indicates that the overall increase in trips across all modes would have an acceptable impact on the surrounding highway and public transport network capacities.



### Trip Generation and Pedestrian Comfort

- 352. The Transport Assessment includes an estimation of trip generation for the existing and proposed developments. The proposed development would be expected to result in an increase in approximately 548 trips in the AM peak hour and 778 trips in the PM peak hour.
- 353. Transport for London's Pedestrian Comfort Guidance recommends a minimum Pedestrian Comfort Level (PCL) of B+ for all areas but defines a C+ comfort level as acceptable in office and retail areas. Proposal 2 of the City of London Transport Strategy aims to achieve a minimum PCL of B+.
- 354. A pedestrian comfort assessment has been conducted for the site. The applicant was unable to undertake their own pedestrian survey data during the pandemic. Data has been collected from surveys undertaken prior to the pandemic. Pedestrian flows for Fleet Street, Shoe Lane and Poppins Court were taken from the recent application for the Salisbury Square Development. Pedestrian flows for St Bride Street were taken from a report from 2016.
- 355. Existing pedestrian comfort levels (PCL) are impacted by the security bollards and planters on St Bride Street and by narrow footways on Shoe Lane. The analysis shows that following the removal of the HVM and the proposed changes to the building line, the PCLs on St Bride Street and Shoe Lane would achieve at least a B+ in most locations surveyed in the future with development scenario.
- 356. The retention of Daily Express Building and desire to achieve a consistent building line across the new Fleet Street frontage means that the pedestrian comfort levels would be expected to fall below the targeted B+ along Fleet Street. A PCL of C+ is expected along the Daily Express Building frontage and a PCL of B along the 120 Fleet Street frontage. The bus stop on Fleet Street close to the south eastern corner of the site creates a pinch point with a resulting PCL of D. While below the targeted level of B+, a PCL of B is considered comfortable and a PCL of C+ is considered acceptable within an office and retail environment, according to TfL's pedestrian comfort technical guide. The PCL of D created by the bus stop is no worse than existing and covers a short distance.
- 357. Overall the scheme would deliver improvements to pedestrian comfort on St Bride Street and Shoe Lane and through the S278 design and evaluation process options to improve the pedestrian comfort level on Fleet Street by widening the footway and rationalising the existing street furniture will be explored and if feasible these works will be funded by the applicant.

### **Stopping Up**

- 358. The development would not require the stopping up of any public highway.

### **Public Realm, Security and Hostile Vehicle Mitigation (HVM)**

- 359. A 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.

- 360. 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.
- 361. The existing security bollards and planters surrounding the site on St Bride Street and Shoe Lane are scheduled to be removed as a condition of the former building owner's S278 agreement.
- 362. Bollards are shown where Shoe Lane, the new route to the east of the Daily Express Building and Poppin's Court meet Fleet Street. The existing bollards on Shoe Lane and Poppin's Court would be retained. The exiting bollards to the east of the Daily Express Building, where the new Y passage is proposed to meet Fleet Street, would be replaced by new bollards. These would be located off the public highway. New bollards are proposed at the entrances to the new passageways from Shoe Lane and Fleet Street, in both cases off the public highway. The bollards are proposed to prevent vehicular access to the new passageways and are considered acceptable.

### **Section 278 Agreement**

- 363. The applicant will be required to enter into a Section 278 agreement to mitigate the impact of additional pedestrian flows in the surrounding area and to contribute towards the delivery of the London Plan policies T2 and D8. The detailed design of the S278 works will be developed alongside the forthcoming healthy streets plan for the Fleet Street and Temple area. The scope of the S278 agreement will cover St Bride Street, Shoe Lane and Fleet Street;

### **St Bride Street**

- 364. Pedestrian priority measures will be introduced along St Bride Street. The City's Transport Strategy details the approach to be taken for pedestrian priority streets;

*Pedestrian priority streets will allow access for motor vehicles, with all vehicles, including cycles, expected to give way to people walking. In some instances, streets will be fully pedestrianised or not allow motor vehicle access at certain times. The access requirements for each pedestrian priority, fully pedestrianised or timed pedestrianised street will be fully assessed as part of the project delivery process.*

Subject to further detailed design through the S278 evaluation and design works, the extension of the pedestrianised section of St Bride Street further north beyond the proposed cycle hub entrance will be explored. The impact on neighbouring occupiers will be fully assessed

as part of this process and the provision of areas for servicing of neighbouring premises will be a key consideration in the evaluation and design of this area. The construction phase represents a chance to better understand the access requirements of neighbouring premises and surveys will be commissioned during this period as part of the S278 works. The developer has committed to funding these extended works should they prove feasible.

Works to St Bride Street will include footway widening along the western footway along the full length of the street to provide additional space to maximise tree planting while maintaining acceptable levels of pedestrian comfort. Carriageway resurfacing and additional greening will also be explored to help emphasise priority for pedestrians. The applicant will be required to fund tree planting along the length of the south western St Bride Street footway and opportunities to incorporate seating will be explored, again fully funded by the applicant.

#### Shoe Lane

365. Works to Shoe Lane will include, but not be limited to; Enhanced urban greening, either through tree planting or raised planters; Any works required to the highway to accommodate the new servicing access; and Any works required to the highway to facilitate the spill out of active uses onto the highway and a potential market operation

#### Junction of Shoe Lane/St Bridge Street

366. The proposals would require the reprofiling of highway at the northern tip of the site to provide level access into the new retail unit. As part of works to the area the S278 will also explore opportunities to provide additional seating and greening.

#### Fleet Street

367. Works to Fleet Street will include, but not be limited to; Widening of the northern Fleet Street footway across the site frontage, the scope for which will be determined within the developing Healthy Streets Plan; Any works required to facilitate step free access to the Daily Express building; A rationalisation of existing street furniture to declutter the footway; and Enhanced urban greening, subject to the maintenance of acceptable levels of pedestrian comfort.

#### **Construction Logistics Plan**

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

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

369. Local Plan policy DM10.1 requires the design of development and materials used should ensure that unacceptable wind impacts at street level and in the public realm be avoided, and to avoid intrusive solar

glare effects and to minimise light pollution. Policy 10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2036 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

### **Wind Microclimate**

370. Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within the immediate area surrounding the site. Computational Fluid Dynamics (CFD) simulation and analysis has also been carried out in accordance with the City of London's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.
371. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways, building entrances, public open space and private roof terraces. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being 5 Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.
372. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
373. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as a result of development. If wind conditions become windier but remain in a category suitable for intended use, or if there is negligible or beneficial effect, wind mitigation is not required.
374. Assessments have been carried out for both the windiest (winter) and summer seasons, and this is covered in Chapter 9 of the Environmental Statement and Volume 3, Annex 3 of the Environmental Statement.
375. The wind tunnel and CFD results broadly give the same assessment results. Where there is variance this would only be by one category and in either category the condition would remain suitable to use. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

### Wind Conditions at Ground Level

376. In the existing baseline conditions the wind tunnel tests and CFD show that conditions around the site are suitable for their intended use, primarily occasional and frequent sitting. To the north of the site at the junction of Shoe Lane, Stonecutter Street and Little New Street there are three locations categorised as standing in the windiest season.
377. Early testing of the effects of the development on wind microclimate led to the incorporation of a number of features into the design of the building and landscaping. These include:
- Façade offset and 50% open mullions around the northern entrance;
  - 50% open façade on the west and east cores;
  - Increase in width and change of orientation for the public passageway through the proposed development;
  - Mullions incorporated along the public passageway through the proposed development
  - Screens installed on the Daily Express Building terraces;
  - Planters installed on the Daily Express Building terraces;
  - Screens embedded in the planters on the private amenity terraces on the new development; and
  - 50% open railing around the private amenity terraces.
378. In considering the completed development, in most locations the wind conditions would remain either in the same categories as existing or become windier but would continue to fall within a category suitable for their intended use.
379. With the proposed mitigation measures in place, all locations at street level would experience wind conditions appropriate to the intended use and there would not be any safety exceedances resulting in unsafe conditions.
380. In testing the proposed development and cumulative schemes within 400m of the site, with proposed mitigation measures in place, there would be no material change in wind conditions from the scenario of the proposed development with existing buildings.
381. In conclusion, with the proposed wind mitigation measures in place, where wind conditions become windier at ground level, they remain suitable for the intended uses in the proposed and cumulative scenarios, and there are no unacceptable wind impacts at street level, and so no additional mitigation above that proposed is required.
382. A Wind Audit would be secured in the S.106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the Wind Tunnel Test 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 ES.
383. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with Local Plan

Policy 7.6, 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.

**Daylight, Sunlight, Overshadowing, Radiance, Solar Glare and Thermal Comfort**

384. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the Building Research Establishment (BRE) guidelines and considered having regard to policy D6 of the London Plan, policy DM 10.7 of the Local Plan and policy DE8 of the draft City Plan. Policy D6D of the London Plan 2021 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing and maximising the usability of outdoor amenity space. The BRE guidelines can be used to assess whether harm is likely to occur. The approach indicated by planning policy is that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings. Local Plan policy DM10.7 states that development which would reduce noticeably the daylight and sunlight to nearby dwellings and open spaces to unacceptable levels taking account of BRE guidelines, should be resisted. The draft City Plan requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards taking account of its context. The residential buildings to be considered are those at:
- a. Sovereign House, 7-13 St Bride Street (also known as 5-6 Poppins Court);
  - b. 26 Farringdon Street;
  - c. 7 Wine Office Court;
  - d. 1, 2 and 3 Wine Office Court;
  - e. St Bride's Church Rectory;
  - f. The Old Bell Public House, 95 Fleet Street;
  - g. 24 Bride Lane;
  - h. 30 Bride Lane;
  - i. The Punch Tavern Public House, 99 Fleet Street;
  - j. 101 Fleet Street; and
  - k. 2 and 9 Bride Court.
385. Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises such as offices are not considered as sensitive receptors and as such

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

## **Daylight**

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

### Old Bell Tavern Public House, 95 Fleet Street

- 390. A total of 5 windows serving 4 rooms were assessed for daylight.
- 391. All four rooms would fully comply with the BRE Guidelines for VSC and NSL, experiencing a negligible impact.
- 392. Overall, the effect of the proposed development on daylight to this building is considered to be negligible.

### The Punch Tavern Public House, 99 Fleet Street

- 393. A total of 12 windows serving 6 rooms were assessed for daylight.
- 394. All six rooms would fully comply with the BRE Guidelines for VSC and NSL, experiencing a negligible impact.
- 395. Overall, the effect of the proposed development on daylight to this

building is considered to be negligible.

#### 101 Fleet Street

- 396. A total of 17 windows serving 4 rooms were assessed for daylight.
- 397. All four rooms would fully comply with the BRE Guidelines for VSC and NSL, experiencing a negligible impact.
- 398. Overall, the effect of the proposed development on daylight to this building is considered to be negligible.

#### 5 & 6 Poppins Court

- 399. A total of 48 windows serving 17 rooms were assessed for daylight.
- 400. A total of 31 windows would meet the BRE Guidelines for VSC. 17 Windows are considered to experience a minor-major scale of effect.
- 401. Of the 17 windows a detailed analysis of the overall effect on rooms is found to have a negligible or minor scale of effect which is not significant, for all but 8 windows serving 5 bedrooms located on the third to fifth floors.
- 402. The 8 windows currently experience a very low VSC in the existing condition between 2.80% and 6.37%, when compared to the BRE Guidelines recommended criteria of 27%. A low existing daylight value, when looking at the percentage reduction criteria, can mean a small reduction is likely to result in a large, disproportionate percentage change.
- 403. The greatest percentage reduction occurs to a bedroom on the fifth floor. However, the actual reduction is small at 2.48% VSC. Therefore, the percentage reduction results show a disproportionate effect from what will actually be experienced. The effects are unlikely to be noticeable and therefore considered acceptable.
- 404. Overall, the effect of the proposed development is considered to be moderate-major adverse for these 8 windows when compared to the baseline situation. The overall effect, when considering the room use and the small actual losses of light can be considered acceptable.
- 405. For NSL, all rooms except five bedrooms on the first, second, third and fifth floors would experience either a small reduction that is within the 20% reduction criteria or will experience no change.
- 406. The five bedrooms above would experience a reduction that exceeds the 20% reduction criteria and would experience reductions of a major scale of effect. Overall, these rooms currently enjoy very small NSL in the existing condition with only 1.5%-6.6% of each room being able to see some sky, when compared to the BRE Guidelines of 80%.
- 407. The actual reduction to each room is therefore small and unlikely to have a noticeable effect on the natural light enjoyed within each room and the effects are considered to be negligible.

#### 3 Wine Office Court

- 408. A total of 7 windows serving 5 rooms were assessed for daylight.



- 409. All five rooms would fully comply with the BRE Guidelines for VSC and NSL, experiencing a negligible impact.
- 410. Overall, the effect of the proposed development on daylight to this building is considered to be negligible.

## 2 Wine Office Court

- 411. A total of 7 windows serving 5 rooms were assessed for daylight.
- 412. All five rooms would fully comply with the BRE Guidelines for VSC and NSL, experiencing a negligible impact.
- 413. Overall, the effect of the proposed development on daylight to this building is considered to be negligible.

## 1 Wine Office Court

- 414. A total of 7 windows serving 5 rooms were assessed for daylight.
- 415. All five rooms would fully comply with the BRE Guidelines for VSC and NSL, experiencing a negligible impact.
- 416. Overall, the effect of the proposed development on daylight to this building is considered to be negligible.

## 26 Farringdon Street

- 417. A total of 15 windows serving 6 rooms were assessed for daylight.
- 418. All six rooms would fully comply with the BRE Guidelines for VSC and NSL, experiencing a negligible impact.
- 419. Overall, the effect of the proposed development on daylight to this building is considered to be negligible.
- 420. The adverse impacts experienced by 5 and 6 Poppins Court are considered to be existing levels of direct daylight to the Poppins Court façade are already very low with the averages being 4% VSC or lower. Therefore, most of the daylight enjoyed within these properties will be from reflected daylight, rather than direct daylight which is what is measured when using the VSC test. The 8 windows which would experience a moderate/major effect currently experience a very low VSC in the existing condition between 2.80% and 6.37%, when compared to the BRE Guidelines recommended criteria of 27%.
- 421. When considering the percentage reductions of VSC against the significance criteria, 8 windows within 5&6 Poppins Court which serve 5 bedrooms would experience a moderate/major adverse significance of effect. However, as discussed, these 8 windows currently experience a very low VSC in the existing condition, meaning that even a small actual reduction is likely to result in a large disproportionate percentage reduction. Overall, when considering the actual reductions of daylight using the VSC test, the effects can be considered acceptable.
- 422. In addition, the No Sky Line (NSL) assessments show that these 8 windows, which serve 5 bedrooms, will experience percentage reductions of a major effect which is significant. However, each of these rooms currently enjoy a very small NSL in the existing condition,

well below the BRE Guidelines recommended criteria of 80%. The actual reduction to each room, regardless of the percentage reduction, is small and unlikely to have a noticeable effect on the natural light enjoyed within each room. Overall, when considering the actual reductions of daylight distribution, the effects can be considered acceptable.

## **Sunlight**

- 423. The BRE Guidelines state that to assess loss of sunlight to an existing building all main living rooms of dwellings should be checked if they have a window facing 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block too much sun. To quantify the available sunlight, the BRE Guidelines advise measuring the percentage of Annual Probable Sunlight Hours (APSH), which is defined as “the total number of hours in the year that the sun is expected to shine on unobstructed ground, allowing for average levels of cloudiness for the location in question”.
- 424. The BRE Guidelines state that sunlight to neighbouring buildings will be adversely affected if the centre of the window will receive less than 25% of APSH (calculated over the whole year) or less than 5% APSH during the winter months (between 21st September and 21st March); and less than 0.8 times its former sunlight during either period; and the reduction in sunlight over the whole year would be greater than 4%.
- 425. APSH has been calculated over the whole year (annual sunlight) and between 21st September and 21st March (winter sunlight). All rooms within the neighbouring residential properties that have a window facing within 90 degrees of due south have been included in the assessment.
- 426. Due to orientation, there are 63 windows serving 23 residential rooms, in 2 individual residential properties surrounding the site which are material considerations in sunlight terms.
- 427. Of the sensitive residential properties surrounding the site, only 5&6 Poppins Court and 26 Farringdon Street have site facing windows that are within 90 degrees south.
- 428. The results of the assessment show that both of these properties would experience alterations which, in accordance with BRE Guidelines would not be noticeable to the occupants. The effects are therefore considered negligible.

## **Overshadowing**

- 429. BRE Guidelines recommend that for an external space to appear well lit at least 50% of the area should receive at least two hours of sunlight on March 21st. If as a result of development an amenity area does not meet the above and the area which receives two hours of direct sunlight is reduced to less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.
- 430. The sun on ground assessment to the proposed rooftop terraces shows that each amenity space would enjoy at least 2 hours of sunlight to over 50% of the total area. these levels of sunlight exceed what is

requested by the BRE Guidelines and the space would continue to enjoy good levels of sunlight throughout the year.

431. Due to the orientation, bulk and massing of the proposed development good levels of sunlight will generally be enjoyed throughout the day.

### **Radiance Study**

432. A radiance study was also carried out by the applicants to complement the daylight and sunlight assessments undertaken. The results of the radiance study demonstrate that the majority of rooms currently experience low levels of daylight, with Average Daylight Factor (ADF) levels typically around 0.1% ADF to 0.4% ADF. The living rooms to the northern end of the building receive slightly higher levels of daylight as they receive additional light from the north and east across St. Bride Street.
433. The radiance analysis shows that only 5 bedrooms are likely to experience a reduction to their ADF if the proposal is built. In each case, the reduction would be small, at no more than 0.1%. This scale of reduction is unlikely to be noticeable by the occupants.

### **Solar Glare**

434. Due to the orientation of the proposed development and the position of the roads, details solar glare assessments were not considered to be required.
435. An annex on Solar Glare is included within the ES for completeness. It details that the orientation and position of the site and surrounding roads were considered, and no instances of solar glare were likely to be perpendicular to the line of travel, occurring for very limited periods of time or blocked by other buildings. The annex confirms that there are no material or significant effects to the safe movement of pedestrians and vehicles on the pavements and roads surrounding the proposed development.

### **Thermal Comfort Assessment**

436. London Plan Policy D8 and D9 and the emerging City Plan 2036 Policy S8 indicates that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings - wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.
437. 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.

438. The Universal Thermal Climate Index (UTCI) categories have been modified for the City of London developments. The usage categories for thermal comfort is set out below and is used to define the categorization of a given location:

		Comfort Category	Examples	Colour
% of time within comfortable UTCI		All Season	Parks (appropriate for use year-round)	Green
	< 50%	Seasonal	Outdoor dining (appropriate for use during most of the year)	Purple
	51%-60%	Short-term	Entrances, unsheltered bus stops (appropriate for short-duration uses year-round)	Light Blue
	61%-70%	Short-term Seasonal	Entrances, unsheltered bus stops (appropriate for short-duration uses during most of the year)	Orange
	71%-80%			Yellow
	81%-90%			Red
% of time within comfortable UTCI (0°C - 32°C)		Transient	Pavements, cycle paths (appropriate for public spaces where people are not expected to linger for long period)	Red

Year-Round Thermal Comfort Categories

439. Four configurations have been assessed including; the existing site with existing surrounding buildings, existing buildings with any buildings with planning permission built out, the proposed development with the existing surrounding buildings and the proposed development with cumulative surrounding buildings.
440. Both the landscaping and the wind mitigation measures considered during the wind microclimate assessments have been included in the study.

#### Public Street Level Shoe Lane

441. On Shoe Lane most of the street experiences comfortable conditions between 81-100% of the time for spring and autumn seasons.
442. For both the existing site and proposed development schemes, the resulting year-round comfort grade is largely 'Seasonal', which is appropriate for outdoor dining.

#### St Bride Street

443. On St Bride Street most of the area experiences comfortable conditions for at least 81% of the spring to autumn seasons.
444. For the existing site, the resulting year-round comfort grade is largely

seasonal, which is appropriate for outdoor dining conditions. The windier conditions around the proposed development reduces the period of comfortable conditions for autumn to spring seasons, resulting in an overall 'Short-term' comfort grade, which is appropriate for sedentary uses.

#### Fleet Street

- 445. On Fleet Street and the proposed arcade street the thermal conditions are suitable for at least 90% of the time for spring to autumn seasons.
- 446. For both the existing and proposed development, year-round comfort grade for the area remains predominantly 'Seasonal' which is suitable for outdoor dining.

#### Poppins Court

- 447. For Poppins Court, conditions are comfortable for at least 81% of the spring to autumn seasons.
- 448. The overall comfort grade 'Short-term' can be seen for the proposed development. Poppins court is a narrow footpath which would not be appropriate for sitting.

#### Northern Bullnose

- 449. For the northern bullnose area, most of the area maintains the same comfort grade (short term) with a small area that becomes 'Short-term' seasonal due to the winter conditions in the winter.

#### Public Route through the proposed development

- 450. The combination of calm wind conditions and sheltering from the sun allows for comfortable conditions along the passageway for at least 90% of the spring to autumn seasons, and 81% of winter. The resulting year-round comfort grade of 'All-season' and 'Seasonal' reflects this.

#### Daily Express Building

- 451. The proposed development provides public space to the rooftop, which is predicted to be comfortable for use nearly all year round. The thermal conditions on the publicly accessible roof are comfortable for at least 90% of spring to autumn seasons.
- 452. The resulting year-round comfort grades vary between 'All-season' and 'Seasonal', indicating conditions suitable for amenity spaces or outdoor seating.

#### Private terraces

- 453. The thermal conditions on the private terraces are comfortable for at least 90% of spring to autumn seasons. The resulting year-round comfort grades vary between 'All-season' and 'Seasonal' indicating conditions suitable for amenity spaces or outdoor dining.
- 454. It is considered that the thermal comfort in and around the site, would be acceptable in accordance London Plan Policy D8, Policy D9 and emerging City Plan policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

### **Air quality**

455. Heating and power will would be provided from off-site sources to avoid the need for on-site combustion. The emissions associated with the vehicle trips have been assessed and should have negligible impact on the local air quality. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment.

### **Access and Inclusive Design**

456. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1, HL1 and S8 of the draft City Plan 2036 and policy 7.2 and D5 of the London Plan. The City's Access Officer has been involved throughout the evolution of the scheme.
457. The proposed development seeks to maximise pedestrian connectivity and permeability where possible, whilst maintaining the security and operational requirements needed for both buildings.
458. All horizontal and vertical access within both buildings have been designed to the recommendations set out in the Approved Document M and BS8300. Lifts would be the main means of vertical circulation within the building and have been designed to accommodate a variety of users, including wheelchair users.

### **Daily Express Building**

459. The Daily Express Building is located to the south west of the application site. The building has two entrances: the historic South Lobby and an East Lobby. The South Lobby fronts onto Fleet Street, where it is proposed to install a ramp for the left-hand set of doors to provide wheelchair access. The East Lobby would be accessed from a new part of public realm.
460. The creation of new passageways to the north and east of the Daily Express Building increase the permeability of the site and provide level access to the East Lobby and a commercial unit. The passageway to the north of the building would need two ramps to ensure the public realm is step free and they would be 10m apart. These would have a gradient of 1:14.
461. The building would utilise a double-sided firefighting lift that would benefit users of larger wheelchairs and mobility scooters. Areas of refuge would be provided within the lobbies of the firefighting staircase, and the lift would allow evacuation of disabled people in line of the London Plan Policy D5. Disabled access to the roof garden would be made via this lift.
462. Wheelchair-accessible WCs would be provided on every floor.

### New Office Building

- 463. The new Office Building would incorporate new retail uses around the ground floor as well as a large lobby running from north to south. The varying levels of the surrounding public realm have meant that the entrances are also on different levels. The proposed retail unit to the north can be accessed from Shoe Lane and via an internal staircase and platform lift connecting it to the lobby. This is also the case for retail unit situated on Shoe Lane. The Cycle House fronting St Bride Street would be connected to the lobby via two internal ramps.
- 464. Evacuation lifts are to be provided to ensure compliance with London Plan Policy D5. These would serve the entire office building, including any potential tenancy splits.
- 465. Wheelchair-accessible WCs would be provided on every office floor.
- 466. Roof terraces would feature on most of the office floor levels. Each of these would utilise a 1:21 slope to provide step-free access between the interior and the slightly raised floor of the terrace.

### Disabled parking bays and cycle spaces

- 467. London Plan 2021 Policy T6.5, London Plan 2015 Policy DM16.5 and draft City Plan 2036 Policy VT3 reference to car-free developments except for disabled persons/ Blue Badge parking.
- 468. The proposals include the provision of two accessible parking spaces within the basement of the Office Building.
- 469. Cycle parking is located in the basement and would be accessed through the Cycle House on St Bride Street. Stairs and two lifts would provide access between the Cycle House and the basement level. A mix of stands would be provided, and would accommodate adapted bikes and/or trikes, in line with the standards set out by the London Plan.

### Noise and Vibration

- 470. The submitted Environmental Statement includes an assessment of the impact from noise and vibration on the surrounding area, including noise and vibration from the enabling works, demolition and construction; noise from the proposed development during operation; and noise associated with increases in road traffic, which could be attributed to the development.
- 471. Generally, in City redevelopment schemes most noise and vibration issues occur during demolition and early construction phases. Noise and vibration mitigation, including control over working hours and types of equipment to be used, would be included in a Construction Management Plan to be approved by condition.
- 472. The proposed development includes a large amount of mechanical plant which would be located at both roof and basement levels, and

would include extract fans, air handling units, heat pumps and condenser units. To ensure that noise from plant is adequately closed and minimised, conditions are required related to plant noise and vibration.

473. All deliveries would take place within dedicated loading bays at basement level and would be therefore have a negligible impact in terms of noise associated with unloading.

### **Health Impact Assessment**

474. Policy HL9 of the Draft City Plan 2036 advises applicants of major developments to assess the potential impacts their development may have on the health and well-being of the City's communities. The applicants have submitted a Health Impact Assessment, based on the Healthy Urban Development Unit's criteria, which demonstrates that health and well-being issues have been adequately addressed.

475. The submitted Health Impact Assessment which has been based on the Healthy Urban Development Unit (HUDU) to develop a comprehensive assessment outlining how the proposed development could impact on health, identifying relevant pathways towards health outcomes drawing on the wider determinants of health. The Assessment concludes that the development would have an overall positive impact on health.

476. Positive impacts include:

- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment.
- Provision of cycle facilities within the Cycle House which will encourage and support active transport by the buildings users and offering services and amenities to the wider local community (café, maintenance etc).
- Servicing and logistics strategy have been designed to minimise delivery vehicle trips to the Site and access points have been designed to avoid conflict with pedestrians and cyclists.
- The Site is well located with good pedestrian and cycle routes, promoting users to choose active modes of travel coming to and from the Proposed Development.
- Provision of high-quality public realm at the ground floor and a new route through the Site improving the physical environment and contributing to social cohesion.
- Provision of open space through the terraces at various levels (levels 7 -17) through the Proposed Development. This will offer workers good access to open space, fresh air and amenity space throughout the day. This would have a beneficial impact on workers physical and mental health. The terraces have been designed to be flexible to tenants needs,



with options for curating spaces for use as social spaces, areas for urban agriculture, outdoor meeting spaces, amenity spaces etc. Publicly accessible open space will be delivered on the roof terrace of the Daily Express Building.

- A Cultural Plan has been submitted to support the delivery of a significant cultural offer as part of the Proposed Development particularly in the context of opening up the Daily Express Building for public access. This would have a positive health benefit of promoting social integration for both the buildings occupants and the wider local community.
- A car-free development (with the exception of two Blue Badge parking spaces for disabled access) minimising vehicles travelling to the Site.
- Building design considering the context of the Site and maximising benefits including employing systems to reduce energy usage (i.e. Double skin facade and passive ventilation). The Proposed Development targets a BREEAM Excellent rating with aspirations to achieve BREEAM Outstanding rating.
- Building has been designed to facilitate achieving a platinum rating under the WELL Building Certification.
- Consideration to sustainability and inclusive design.

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

- Implementation of a Construction Environmental Management Plan (CEMP) to minimise any environmental effects including dust (via Dust Management Plan), noise and vibration;
- Implementation of a Construction Logistics Plan (CLP) to minimise the environmental and road traffic related impacts of the demolition and construction works;
- Implementation of a Delivery and Servicing Management Plan;
- Implementation of a Framework Travel Plan to minimise vehicle trips – as the Site has good access to public transport and active travel modes, the target focus is to maximise uptake of active travel options (walking and cycling);
- Local Procurement Strategy and Local Training, Skills and Jobs Brokerage Strategy to be agreed through the Section 106 to maximise the economic benefits locally; and
- Legible London signage to be delivered through Section 106 Agreement.

478. Potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions. The development seeks to improve the health and addresses health inequalities, the

residual impact would be acceptable, and the proposals would comply with London Plan policy 3.2 and London Plan policy GG3 and emerging City Plan 2036 policy S1.

## **Sustainability**

### **Circular Economy**

479. Emerging New 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.
480. 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:
- Option 1: Light refurbishment of the Existing River Court building, mainly fabric upgrades and new central plant (boilers + chillers), retained distribution of services
- Option 2: Refurbishment with new central plant (boilers and chillers) and retained distribution of services, plus lightweight extension to provide additional lettable space, new façade and thermal elements, new services (heat pump + chiller top up) – achievable floorspace 10,000sqm GIA lower than in option 3
- Option 3: Redevelopment with retained basement structure, new superstructure, new façade, thermal elements and services (the proposed design)
481. The details of the 3 options in terms of extent of alterations to existing building elements and to new services have been selected to provide the best possible, balanced outcome with respect to embodied and operational carbon emissions savings for each scheme. The Whole Life-Cycle carbon emissions were calculated as of the beginning of the implementation works and include 'Use' (B1-B5) and 'End of life' (C1-C4) stages. The unknown Whole Life-Cycle carbon emissions of the retained parts of the building prior to the works are considered as spent carbon and are not included into the calculations.

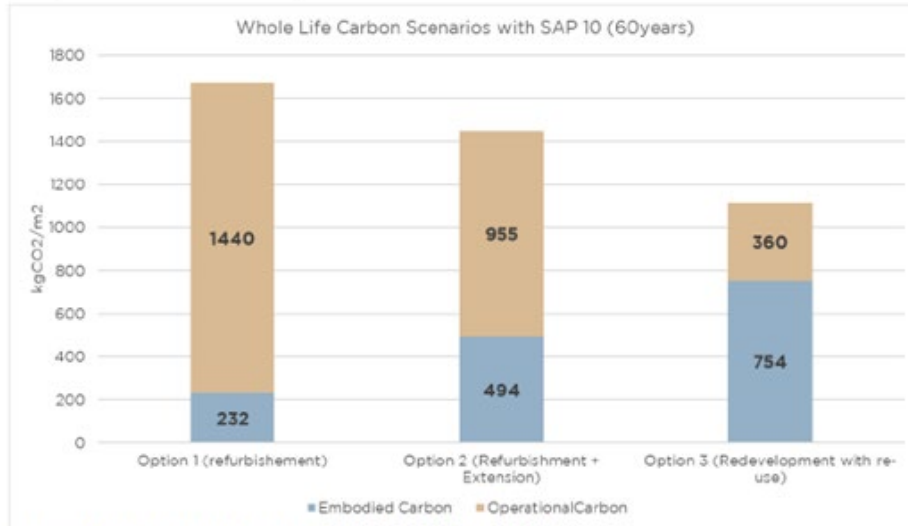


Figure 2-1 Whole Life Carbon for various design scopes

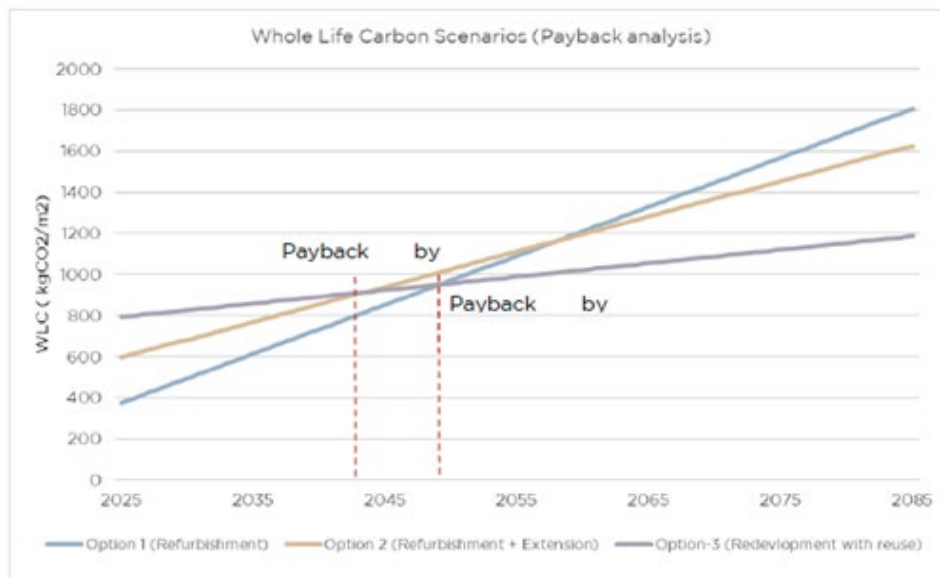


Figure 2-2 Cumulative carbon over the life span of assessed design scopes

482. The whole life-cycle carbon emission projections for the 3 options (see figures 2-1 and 2-2 copied from the submitted Circular Economy Statement above) show that option 3 (grey line) would have the least carbon emissions over a 60-year lifespan while option 1 (blue line) would have the most, due to a very high percentage of operational carbon emissions over this time span. When considering the higher embodied carbon impact, options 2 and 3 would achieve paybacks – reduced carbon emissions compared to option 1, after 19 years for option 3 and 24 years for option 2. The applicants therefore decided to pursue redevelopment option 3.
483. The submitted circular economy strategy includes the following commitments:
- The retention of the foundations and basement retaining walls (the retained substructure is 10.9% of the total elemental mass of the

building) and a new lightweight structure with low embodied carbon and material efficiency

- a pre-demolition audit that has been carried out to identify the percentage of demolition and strip out waste which can be reused or recycled on site or offsite.
- Diversion of 90% (by tonnage) of the non-demolition waste and 95% (by tonnage) of the demolition waste from going into the landfill.
- the use of 30-50% cement replacement products
- 20% recycled steel in columns and beams and 97% in rebar
- Achieving flexibility and adaptability by providing a large grid size and soft spots in the structure
- Prioritising sustainably sourced material e.g. FSC or PEFC certified timber, suppliers who operate a compliant environmental management system.

484. A resource efficiency and site waste management plan will be implemented on site to minimise waste generation and then manage waste responsibly. Further, an operational waste strategy will be implemented to ensure municipal waste is managed sustainably. The confirmation of details of the proposed initiatives outlined in the statement to reduce waste and encourage reuse is requested by condition as part of a detailed Circular Economy Assessment and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments. The detailed assessments 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 CO2 emissions

485. The Energy Statement accompanying the planning application demonstrates that the new building has been designed to achieve an overall 44% reduction in regulated carbon emissions compared with a Building Regulations compliant building.

486. The proposed energy demand reduction strategy would reduce the new building's operational carbon emissions by 19% compared to a Building Regulations compliant building and includes the following main elements:

- High level envelope insulation and minimising solar gain with a ventilated cavity façade system with integrated, automated blinds. The double-skin façade is considered to be the optimum system that can incorporate natural ventilation while protecting from noise and pollution
- Incorporation of full-height side-hung windows to allow for passive ventilation for parts of the office floors

- Mechanical ventilation with high rate of heat recovery through air source heat pumps and water-cooled chillers connected to cooling towers
  - High thermal mass provided by exposed concrete slabs to moderate cooling loads.
487. 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 in a plant room in the basement of the proposed development.
488. A low temperature communal heating network consisting of 4 air source heat pump systems would serve the whole site to meet the energy demand for space heating. Hot water would be provided by 2 water to water heat pumps. Additional renewable energy would be provided by 91 PV panels (7 No on the Daily Express Building's roof and 84 No panels on the new building as part of a biosolar roof on level 18 and on the top of plant level 19, equating to an overall panel area of approx. 161sqm.). These technologies would contribute carbon emissions savings of 25% compared to a Building Regulations compliant building.
489. The refurbished Daily Express Building would achieve an overall 56% reduction in carbon emissions compared to a Building Regulations compliant building, 40% of which through energy demand reduction and 16% through renewable energy technologies. Due to the listing of the building, further passive design measures to reduce cooling demand cannot be incorporated. The building would be served by the heat pumps and chillers on the roof and basement of the new building.
490. The site-wide energy strategy demonstrates compliance with the London Plan carbon emission reduction targets. A S106 obligation 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

491. A BREEAM New Construction 2018 pre-assessment for the new shell and core office building and BREEAM Non-Domestic Refurbishment and Fit-Out 2014 pre-assessments for the Daily Express office use and the Daily Express Leisure use have been prepared.
492. The strategy aims to achieve at least an "Excellent" rating for all uses; however the new office building's aspiration is to achieve an "outstanding" rating, targeting a score of over 90%. The applicants will be able to confirm this after the detailed design stages of the development. The pre-assessment indicates a score of 90.40% for the

new built River Court building and 75.73%/75.31% for the Daily Express refurbishment office/leisure. The River Court building is on track to achieve a high number of credits in the CoL's priority categories of Energy, Water, Pollution and Materials. Further credits could be targeted in the detailed design phase of the development.

493. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2036 Policy DE1. Post construction BREEAM assessments, based on a fully fitted-out development are requested by condition.

#### Whole Life-Cycle carbon emissions

494. Emerging New London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.
495. The proposed Whole Life-Cycle carbon reduction strategy is based on reducing embodied carbon impacts by minimising operational energy demand, by the retention of the existing basement retaining walls, by increasing the use of cement replacement in concrete from 25-50% and of recycled content of structural steel as well as by specifying the fabrication of steel. Further opportunities will be investigated with regard to minimising quantities of steel, concrete and aluminium and raising recycled contents as much as possible.
496. Over the proposed building's whole life cycle, the embodied carbon emissions calculations at planning stage would be 753 kgCO<sub>2</sub>/m<sup>2</sup>, demonstrating emissions that are lower than the GLA's Aspirational WLC benchmark of 800 kgCO<sub>2</sub>e/m<sup>2</sup>. 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

497. 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.

498. The new development offers plenty of opportunities to embed robust green infrastructure within the new architecture and enhance urban greening and biodiversity on the large terraces located on levels 6 to 17, to include a biosolar roof on level 18, perimeter planting on levels 18-20, as well as a public terrace with landscaping on the roof of the Daily Express building. The terraces would be accessible to all occupants and are designed to provide a mix of amenity spaces and native, biodiverse planting, including wildflower/sedum, herbaceous planting, shrubs and small trees as well as wildlife boxes.
499. Details of a holistic scheme of green roofs, hedges, amenity planting and biodiverse habitats, and of a rainwater harvesting system to support high quality urban greening and appropriate maintenance of the proposals, are required by condition.
500. The proposed development includes a range of green infrastructure measures such as terrace planting and biodiverse green roofs that would contribute to cooling the building, resulting in an Urban Greening Factor of 0.34 that exceeds the GLA and the City of London's requirements. The biodiverse features would provide a green and attractive setting as there are many hard roof surfaces on the existing and surrounding buildings and would result in a net gain in biodiversity to the site.

#### Climate Change Resilience

##### Water Resources

501. The proposed development will significantly reduce its demand on mains water supply through the use of water efficient fittings. The proposed fittings will ensure the new development will consume 40% less potable water than a baseline building water consumption. A major leak detection system will also be installed.

##### Flooding

502. Two rainwater storage tanks are proposed, one for later slow release of the water into the sewer, the other for rainwater harvesting to use for irrigation. The tank volumes are selected to be able to achieve greenfield discharge condition under the 1-in-100-year (plus 40 % climate change) storm event. Details of opportunities to incorporate blue roofs on the terraces of the development in order to further reduce water-run-off are requested by condition.

##### Heat Stress

503. The sustainability statement outlines measures to prevent overheating through the double-skin façade with integrated blinds and potential for opening window sections within the inner skin of the façade, ventilating through gaps in the outer skin. The proposed measures will provide natural ventilation as well as reduce excessive solar gains thus reducing the cooling demand.

504. Natural Capital and Pest & Diseases
505. The proposed development will incorporate urban greening that would improve significantly on the existing quantity and quality of urban greening on site. 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.
506. 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

507. 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.
508. 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 exceeds current and new London Plan policies as well as Local Plan policies in most aspects, and it is on track to achieve an “outstanding” BREEAM assessment rating.
509. The proposals indicate that Whole Life-Cycle Carbon emissions can be significantly reduced in line with the GLA’s aspirational benchmark. The existing building has been assessed and found to be unsuitable to be transformed into a sustainable development over and beyond a lifetime of 60 years. However, Circular Economy principles can be positively applied to achieve a long term, robust, low carbon, flexible and adaptable development. While the proposed development presents a well-considered and innovative approach to integrating green infrastructure and urban greening across the scheme and its response to climate resilience is considered to be acceptable, a more innovative approach to incorporating resilience measures would be welcomed and an assessment is requested by condition. Passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond London Plan requirements.



## **Security**

510. Details of the overall security strategy will be required by condition and a Visitor Management Plan will be required by S106 which will detail more specifically the measures to protect the public roof terrace and public realm.
511. The proposal, subject to conditions and S106 is considered to be in accordance with policy DM3.2 and draft City Plan strategic policy S2 and policies SA1 and SA3.

## **Fire Statement**

512. 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.
513. The applicant has consulted with the District Surveyors Office in relation to the design, and the London Fire Brigade and the City's fire safety advisor have given their input. There are no issues with the fire safety measures proposed.

## **Equality Impacts**

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

514. The City, as a public authority must, in the exercise of its functions, have due regard to the need to:
- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
515. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. It is the view of officers that a decision to grant permission in this case inclusive and accessible design principles have been incorporated to ensure people with a mobility restriction, and any other limiting considerations can use the new facilities with ease. The proposed development will have step-free access to all parts of the buildings, including the terraces.
516. As set out in the considerations section of the report the Committee is required to have due regard to its obligations under the Equality Act 2010. An Equalities Impact Assessment has been carried out in respect of the scheme and is appended to this report.
517. It has considered that the physical design and layout of the scheme has been designed to be accessible to all regardless of age, disability,

whether you are pregnant, race, sex, sexual orientation and gender reassignment and marital status.

518. This would be achieved through measures such as:
- The provision of level access or step free access and lifts where this cannot be achieved due to building and site constraints. This would include accessible routes through the site and step free access to all parts of each building including the roof terraces;
  - The commitment to provide accessible parking and public realm improvements
  - The provision of accessible facilities including toilets, wheelchair store and accessible cycle parking
  - Safe evacuation procedures for people with physical disabilities or impairment
  - The provision of community and cultural uses.
519. Final details of access to the Daily Express Building and the new office building would be secured by condition in order to ensure equality of access.
520. Conditions, informatives and a S278 agreement would be required to cover matters such as the accessible parking, final layout of supporting facilities such as the toilets and access into the Daily Express and new office buildings. An informative would be placed on the permission reminding future occupiers of their duty under the Equality Act 2010. This would be particularly relevant as the future occupiers of the buildings are unknown.
521. The Corporation needs to ensure that dialogue with the neighbours is maintained. A suitable programme of highway works and conditions relating to construction and demolition management and logistics are recommended in order to minimise the impact of the scheme on the neighbouring residents and occupiers.

### **Assessment of Public benefits and the paragraph 202 NPPF balancing exercise**

522. 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".
523. Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. Paragraph 193 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great

weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. As the statutory duty imposed by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged, considerable importance and weight must be given to the desirability of preserving the setting of listed buildings, when carrying out the paragraph 196 NPPF balancing exercise.

524. When considering the listed building consent applications, the duty imposed by section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 applies and in considering whether to grant listed building consent special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. As the application site lies in part within the Fleet Conservation Area, the duty imposed by section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged in relation to that part of the application site which lies within the conservation area. As a result, when carrying out the paragraph 196 NPPF balancing exercise in relation to that part of the application site lying within the conservation area, considerable importance and weight must be given to the desirability of preserving or enhancing the character or appearance of that conservation area.
525. An assessment of the significance of designated heritage assets has also been undertaken and less than substantial harm of different degrees has been identified to designated heritage assets and this is summarised below.
- Modest, less than substantial, harm would be caused to the heritage significance of St Paul's Cathedral by virtue of in-direct impacts on setting, the result of the height and presence of the proposed development on the silhouette of the Cathedral from the Cannon Street approach, the Monument and the Sky Garden at 20 Fenchurch Street. **It is considered that this less than substantial harm would be at the lower end of the spectrum.**
  - Slight, less than substantial, harm would be caused to the heritage significance of the St Paul's Conservation Area by virtue of in-direct impacts on setting, the result of the height and presence of the proposed development on the silhouette of the Cathedral from the Cannon Street approach, the Monument and the Sky Garden at 20 Fenchurch Street. **It is considered that this less than substantial harm would be very much at the lower end of the spectrum.**
  - Slight, less than substantial, harm would be caused to the heritage significance of St Dunstan in the West by virtue of in-direct impacts on setting, the result of the height and presence of the proposed development on the silhouette of the church

tower when approached from the Strand. **It is considered that this less than substantial harm would be very much at the lower end of the spectrum.**

- Slight, less than substantial, harm would be caused to the heritage significance of the Fleet Street Conservation Area by virtue of in-direct impacts on setting, the result of the height and presence of the proposed development on the silhouette of the church tower when approached from the Strand. **It is considered that this less than substantial harm would be very much at the lower end of the spectrum.**

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

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

- Heritage Benefits: the proposal would result in a moderate enhancement to the significance of the former Daily Express Building as a result of direct and indirect enhancement of significance and setting. The proposals for the Daily Express Building would also result in modest enhancement to the Fleet Street Conservation Area overall. It was also found that there would be a slight enhancement to the significance of St Bride’s Church as a result of change in its setting. Together, the heritage benefits are attributed substantial weight.
- Heritage Understanding: the proposed inclusive form of development for the Daily Express Building, reimagined as a new cultural hub on Fleet Street, would allow a wider public a greater understanding and appreciation of the heritage significance of the Daily Express building. This is attributed significant weight.
- Provision of a public cycle house which would promote active travel. The house is an innovative concept, providing a dedicated internal space within the commercial building footprint for use by visitors to the two buildings and to the wider area, and within close proximity to two major cycleways. The area would provide secure cycle parking sheltered from the elements. This is a benefit that would attract moderate weight.

528. In terms of the harm found in particular to St Paul’s Cathedral, but also to St Dunstan in the West, given they are Grade I listed buildings and designated assets of the highest order, particular force has been attributed to the failure to accord with the statutory test at s.66 of the Act, and the need to give considerable importance and weight. Together with the residual harms caused to the St Paul’s and Fleet Street Conservation Areas respectively, the heritage harm is given

considerable weight.

529. When carrying out the Para 202 balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving the building or its setting. When carrying out the balancing exercise in a case where there is harm to the significance of a conservation area, considerable importance and weight should be given to the desirability of preserving or enhancing the character or appearance of the conservation area. It is considered that the public benefits described, and attributed weight above would outweigh the heritage harm identified, thus passing the test at paragraph 202 of the NPPF.
530. In terms of the Development Plan, the proposal would draw some conflict and some lesser support from heritage policies, namely Local Plan Policies CS 12, DM 12.1 and DM 12.3 and London Plan Policy HC1. The heritage harms would not be outweighed by the heritage benefits in this instance, given the particular force which must be given to the considerable importance and weight afforded to the preservation of St Paul's Cathedral as a Grade I listed designated heritage asset of the highest order, which is less than substantially harmed. Therefore, it is considered that the proposal would be contrary to those heritage policies in the Development Plan.
531. In conclusion, the wider public benefits as material consideration would outweigh the conflict with the development plan. The public benefits of the site and wider site include: Rejuvenation of the Grade II\* Daily Express Building as a publicly accessible cultural destination, with complementary uses and a landscaped public roof garden, an improved public realm including new pedestrian routes through the site and increased pavement widening on Fleet Street which improves pedestrian movement and comfort, increased active ground floor frontages providing flexible retail, promotion of active travel through the delivery of a prominently located Cycle House, contributions towards further public realm improvement works to St Bride Street secured through the S278 agreement, use of off-site consolidation centres to minimise vehicle movements, delivery of a Cultural Implementation Strategy which would provide details on how further consultation and delivery plans would be adopted which is secured via a S106 agreement, delivery of an exemplar new office building demonstrating high sustainability credentials, high standards of architecture and design which provides high quality internal and external environments which embed health and wellbeing through the provision of unique south facing landscaped external amenity terraces for office occupiers.

### **Planning Obligations**

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

532. 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.

533. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
534. 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).
535. CIL contributions and City of London Planning obligations are set out below.

#### MCIL2

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution (Excl. indexation)</b>	<b>Forwarded to the Mayor</b>	<b>City's charge for administration and monitoring</b>
<b>MCIL2 payable</b>	£3,365,757	£3,231,127	£134,630

#### City CIL and S106 Planning Obligations

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
City CIL	£1,472,850	£1,399,207	£73,643
<b><u>City Planning Obligations</u></b>			
Affordable Housing	£981,900	£972,081	£9,819
Local, Training, Skills and Job Brokerage	£589,140	£583,249	£5,891
Carbon Reduction Shortfall (as designed) - Not indexed	£1,207,228	£1,207,228	£0
Section 278 (Evaluation and Design) - Not indexed	£100,000	£100,000	£0
S106 Monitoring Charge	£5,500	£0	£5,500

<b>Total liability in accordance with the City of London's policies</b>	<b>£4,356,618</b>	<b>£4,261,765</b>	<b>£94,853</b>
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### City's Planning Obligations

536. 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)*
- Cycling Promotion Plan
- Legible London Contribution *(£20,000 excl. indexation)*
- Relocation of Cycle Hire Docking Station *(£45,000 excl. indexation)*
- Cycle Hire Network Improvements Contribution *(£220,000 excl. indexation)*
- Construction Monitoring Costs
- Carbon Offsetting
- Utility Connections
- Section 278 Agreement
- Public Route & Public Realm *(Specification, Access & Management Plan)*
- Public Roof Terrace *(Access & Management Plan)*
- Lobby Entrance, Exhibition and Amenity Spaces *(Access & Management Plan)*
- Cultural Implementation Strategy
- Cycle House *(Provision, Access & Management Plan)*
- Incubator Space
- Wind Audit
- Solar Glare
- Television Interference Survey

- ‘Be Seen’ Energy Performance Monitoring
537. 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.
538. The scope of the s278 agreement may include, but is not limited to, improvements to footways/carriageways of St Bride Street, Shoe Lane and Fleet Street to accommodate increased pedestrian and cyclist movements, and the provision of additional seating, greening and planting of street trees where appropriate.

#### Monitoring and Administrative Costs

539. 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.
540. 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

541. 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.

#### Human Rights Act 1998

542. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights (“ECHR”)).
543. Insofar as the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate. It is not considered that the proposal would result in an unacceptable impact on the existing use of the properties. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City’s primary business and professional services function, outweighs the Minor Adverse impact and that such impact is



necessary in the interests of the economic well-being of the country and is proportionate.

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

### **Conclusion on Planning Permission and Listed Building Consent**

545. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, and the emerging Local Plan and considering all other material considerations.
546. The proposed development comprises the demolition of an unremarkable and outmoded office development and the replacement proposed delivers a high quality, office-led development on Fleet Street, with a robust cultural offer which would meet the growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses. Strategic Policy CS1 of the City of London Local Plan 2015, emerging Policy S4 and policy 4.2 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers.
547. The building 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 incubators, start-ups and other small and medium sized companies. The office space would be complemented by publicly accessible commercial, cultural and permeable spaces adding vibrancy to the City's streets and benefitting the City's diverse communities.
548. The buildings would be designed to high sustainability standards, adopting Circular Economy principles, targeting a BREEAM "Outstanding" rating for the new building and a BREEAM "Excellent" rating across all buildings as the highest feasible and viable rating based on the use and complexity of demands especially for the listed building.
549. Dedicated areas of planting and greening would be incorporated into the development through a combination of urban greening of the public realm. On all the buildings terraces and tree planting, thereby significantly increasing the biodiversity on site that would contribute to improvements of the wider area.
550. The scheme delivers significant public realm enhancements, including a generously proportioned east to west route through the site, connecting Fleet Street with Shoe Lane to St Bride Street. Further enhancements include improving pedestrian movement and comfort on Fleet Street by setting the new building line back at ground floor level and the creation of a publicly accessible roof top garden on the Daily

Express Building, with views of the processional route and St Pauls Cathedral.

551. The increase in floorspace and occupation of the development places extra pressure on the comfort and safety of the City's streets. The overall width of the routes permeating through site and provision of additional routes would increase their capacity and improve pedestrian comfort levels. Overall, the pedestrian experience around the site is expected to improve as a result of the proposals.
552. 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 a cycle house is welcome as an innovative way to meet short stay cycle parking requirements while maintaining a high-quality public realm and attractive front of house.
553. Objections have been received from statutory consultees, residents and third parties relating to the design of the development, its impact on designated and non-designated heritage assets, daylight and sunlight implications and the impact on the environment and amenity of the immediately surrounding area and buildings. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations.
554. The proposals would deliver an uplift in retail floorspace in the Principal Shopping Centre.
555. The proposal has been assessed in accordance with other relevant SPGs, SPDs and guidance notes listed in the report.
556. There are a small number of major and moderate adverse impacts, in terms of loss of daylight and sunlight, on flats at 5 & 6 Poppins Court. Where there are moderate or major adverse impacts, retained levels of VSC and NSL are appropriate to the local context. As such the extent of harm is not considered to be such that it would conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. When considered against the wider benefits of the scheme, these impacts are considered to be acceptable.
557. Negative impacts during construction would be controlled as far as possible by the implementation of a robust Construction Environmental Management Plan and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions would minimise any adverse impacts.
558. It is considered that the proposal would cause harm to the significance of St Paul's Cathedral as a grade I listed building of outstanding special interest, failing to preserve its setting. It would result in moderate enhancement to the Daily Express Building and Fleet Street Conservation Areas, and a slight enhancement to St Bride's Church.
559. It is almost always the case that where major development proposals come forward in the City there is at least some degree of non-

compliance with planning policies. In arriving at a decision, it is necessary to have regard to all the policies in the development plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it. The heritage policies in the London Plan (in particular HC1) and in the Local Plan (in particular CS12) do not incorporate a balancing exercise as found in paragraph 202 of the NPPF. As a result, if a proposal results in any harm to the significance of a heritage asset it will result in conflict with the heritage policies. The application proposals conflict with London Plan policy HC1 and with Local Plan policies CS12, and DM12.1. Whilst in this case, the proposals are in compliance with a number of policies, conflict has also been identified with a number of other development plan policies as outlined above in this conclusion. It is the view of officers that taken as whole the proposal does not comply with the development plan when taken as a whole.

560. The LPA must determine the application in accordance with the development plan unless other material consideration indicate otherwise. It is for the LPA to weigh the other material considerations and decide whether those that support the development outweigh the priority statute has given to the development plan, and the other material considerations which do not support the proposal. Other material considerations are set out below.
561. Paragraph 11 of the NPPF sets out that there is a presumption in favour of sustainable development.
562. As set out in paragraph 199 of the NPPF, great weight should be given to the designated heritage asset's conservation, and at paragraph 200, that any harm should require clear and convincing justification. The weight to be given to a designated heritage assets conservation should increase with its importance.
563. The NPPF, paragraph 202, requires that harm be balanced against the public benefits. The paragraph 202 NPPF balancing exercise is also to be applied when considering the harm to non-designated heritage assets, designated heritage assets and impacts on the Fleet Conservation Area and processional routes within St Paul's Conservation Area. That balancing exercise is set out in the body of this report. It is the view of officers that giving great weight to the conservation of heritage assets, and considerable importance and weight to the desirability of preserving the setting of listed buildings and to the desirability of preserving or enhancing the character or appearance of the conservation areas, the identified harm to the significance of the designated heritage assets is outweighed by the public interest benefits associated with the proposed development. That is the case whether harm to the significance of the designated heritage assets affected is considered cumulatively or on an asset by asset basis.
564. Officers also consider that applying paragraph 203 in respect of harm to the significance of the non-designated heritage assets the harm to their significance is outweighed by the public interest benefits

associated with the proposed development. That is the case whether the harm to the significance of the non-designated heritage asset is considered cumulatively or on an asset by asset basis.

- 565. This means that notwithstanding the conflict with the heritage policies within the development plan, the NPPF would not support the refusal of this application for planning permission on heritage grounds.
- 566. The proposal has been assessed in accordance with other relevant SPGs, SPDs and guidance notes listed in the report.
- 567. Taking all material matters into consideration, officers are of the view that the material considerations which weigh in favour of the grant of planning permission outweigh the identified conflict with the development plan the and other material considerations which weigh against the grant of planning permission.
- 568. Applying the approach in section 38(6) of the Planning and Compulsory Purchase Act 2004, Officers recommend that planning permission should be granted for the proposed development subject to all the relevant conditions being applied.

**Background Papers – 21/00538/FULEIA:**

Memo, 16/07/2021, Contract and Drainage Service  
Email, 16/07/2021, Heathrow Airport Ltd  
Email, 16/07/2021, London City Airport  
Email, 19/07/2021, NATS Safeguarding  
Letter, 26/07/2021, Ian and Mrs Debra Starkey  
Letter, 27/07/2021, Historic England  
Letter, 29/07/2021, Environment Agency  
Email, 29/07/2021, Thames Water  
Letter, 30/07/2021, City of Westminster  
Memo, 30/07/2021, Sustainability Officer  
Letter, 02/08/2021, London Borough of Tower Hamlets  
Memo, 03/08/2021, Lead Local Flood Authority  
Letter, 03/08/2021, Natural England  
Email, 04/08/2021, Chris Rogers  
Letter, 04/08/2021, Twentieth Century Society  
Email, 05/08/2021, Ancient Monuments Society  
Email, 09/08/2021, Xiaobing Liu and Lei Yao  
Email, 10/08/2021, Tom Whall  
Letter, 11/08/2021, LAMAS  
Email, 13/08/2021, Tom Street  
Letter, 13/07/2021, Landsec  
Letter, 14/08/2021, Susannah Bond  
Letter, 18/08/2021, Christopher and Alison Edwards  
Letter, 18/08/2021, Ludovica Attanasio  
Memo, 18/08/2021, Environmental Health Officer  
Email, 19/08/2021, Tom Street  
Letter, 23/08/2021, Greater London Authority  
Email, 24/08/2021, Thames Water  
Memo, 25/08/2021, Access Team  
Online Comment, 25/08/2021, Kirsty Mann  
Letter, 27/08/2021, Royal Borough of Greenwich  
Memo, 31/08/2021, Air Quality Officer  
Online Comment, 31/08/2021, Alexander Scurlock  
Online Comment, 31/08/2021, Henrietta Fudakowski  
Letter, 01/09/2021, Allen White  
Online Comment, 01/09/2021, Timothy Parker  
Online Comment, 01/09/2021, Allan O'Neill  
Online Comment, 01/09/2021, Rosemarie Hutchinson  
Email, 02/09/2021, Santwana Palit  
Email, 02/09/2021, Stuart Atkinson  
Email, 02/09/2021, Vanessa Roguska  
Online Comment, 02/09/2021, Sarah Field  
Online Comment, 02/09/2021, Toby Brown

Online Comment, 03/09/2021, Darren Shapland  
Letter, 07/09/2021, London Borough of Camden  
Letter, 17/07/2021, Conservation Area Advisory Committee  
Memo, 22/09/2021, London Borough of Southwark  
Memo, 23/09/2021, District Surveyors Office  
Letter, 24/09/2021, London Borough of Lambeth  
Email, 29/09/2021, Tom Whall

**Application Documents – 21/00538/FULEIA:**

Planning Application Forms, DP9, 21/06/2021  
Community Infrastructure Levy (CIL) Form, DP9, 21/06/2021  
Design and Access Statement, BIG, 21/06/2021  
Planning Statement, DP9, 21/06/2021  
Cultural Plan, Futurecity, 21/06/2021  
Environmental Statement Volume 1 – Chapters 1-12, Bjarke Ingels Group, 21/06/2021  
Environmental Statement Volume 2 – Townscape and Visual Impact Assessment & Built Heritage Assessment, Bjarke Ingels Group, 21/06/2021  
Environmental Statement Volume 3 – Technical Appendices, Bjarke Ingels Group, 21/06/2021  
Environmental Statement Non-Technical Summary, Bjarke Ingels Group, 21/06/2021  
Statement of Community Involvement (SCI), Kanda, 21/06/2021  
Transport Assessment, Velocity, 21/06/2021  
Waste Management Strategy, Velocity, 21/06/2021  
Energy Statement, chapmanbdsp, 21/06/2021  
Sustainability Statement, chapmanbdsp, 21/06/2021  
Circular Economy and Whole Life Carbon Statement, chapmanbdsp, 21/06/2021  
Thermal Comfort Assessment, AKTII, 21/06/2021  
SUDS Drainage Strategy, AKTII, 21/06/2021  
Flood Risk Assessment, RMA Environmental, 21/06/2021  
Arboricultural Impact Assessment, schofield lothian, 21/06/2021  
Fire Statement, chapmanbdsp, 21/06/2021  
Draft Construction Management Plan, Real PM, 21/06/2021  
Radiance Assessment, Point 2, 26/08/2021  
Daylight Note, Point 2, 15/09/2021  
Fire Statement, Bjarke Ingels Group, 16/09/2021  
Daylight and Sunlight Note, Point 2, 22/09/2021  
Response to GLA Energy/Whole Life Carbon Comments with supporting PDFs, 23/09/2021  
Response to COL Access Comments with supporting PDFs, Bjarke Ingels Group, 23/09/2021  
Response to Heritage Groups, DP9 Ltd, 24/09/2021

DEB Lift Traffic Study, chapmanbdsp, 29/09/2021  
Transport Technical Note, Velocity, 29/09/2021  
Response to TfL/GLA, DP9 Ltd, 29/09/2021  
Solar PV Solutions Document, Bauder, 01/10/2021  
Addendum to Design and Access Statement, Bjarke Ingels Group, 01/10/2021  
Equality Statement, Bjarke Ingels Group, 01/10/2021  
SUDS Drainage Strategy for Planning, AKTII, 01/10/2021

## **Appendix A**

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

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

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

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

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

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

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



## **APPENDIX B**

### **Relevant London Plan Policies**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Policy HC2 (World Heritage Sites) requires that "development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes." The policy also states that "development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the

Heritage Impact Assessment."

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

Policy HC4 (London View Management Framework) states that "development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places."

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

S1 Healthy and inclusive city

HL1 Inclusive buildings and spaces

HL2 Air quality

HL3 Noise and light pollution

HL4 Contaminated land and water quality

HL6 Public toilets

Policy HL9 Health Impact Assessments

S2 Safe and Secure City

S22 Fleet Street and Ludgate Key Area of Change

SA1 Crowded Places

SA3 Designing in security

HS3 Residential environment

S4 Offices

OF1 Office development

S5 Retailing

RE2 Retail links

S6 Culture, Visitors and the Night -time Economy

CV2 Provision of Visitor Facilities

CV5 Public Art

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



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

Air Quality SPD (July 2017);

Archaeology and Development Guidance SPD (July 2017);

City Lighting Strategy (October 2018);

City Transport Strategy (May 2019);

City Waste Strategy 2013-2020 (January 2014);

Protected Views SPD (January 2012);

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

Planning Obligations SPD (July 2014);

Open Space Strategy (2016);

Office Use SPD (2015);

City Public Realm (2016);

Cultural Strategy 2018 – 2022 (2018).

Fleet Street Conservation Area Character Summary and Management Strategy SPD 2015

Whitefriars Conservation Area Character Summary and Management Strategy SPD 2016

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

Temples Conservation Area Character Summary

### **Other**

Tower of London World Heritage Site Management Plan

## Relevant Local Plan Policies

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- a) inclusive and safe for 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.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### ***DM16.4 Encouraging active travel***

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.
2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

### ***DM16.5 Parking and servicing standards***

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are

provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.

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

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

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

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

### ***CS17 Minimising and managing waste***

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

#### ***DM17.1 Provision for waste***

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

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

#### ***DM17.2 Designing out construction waste***

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

a) reuse of existing structures;

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

### ***CS18 Minimise flood risk***

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

#### ***DM18.1 Development in Flood Risk Area***

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
  - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
  - b) the benefits of the development outweigh the flood risk to future occupants;
  - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.
2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:
  - a) all sites within the City Flood Risk Area as shown on the Policies Map; and
  - b) all major development elsewhere in the City.
3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.
4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.
5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.



6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

### ***DM18.2 Sustainable drainage systems***

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

### ***DM18.3 Flood protection and climate***

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

### ***CS19 Improve open space and biodiversity***

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

#### ***DM19.1 Additional open space***

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.
2. New open space should:
  - a) be publicly accessible where feasible; this may be achieved through a legal agreement;
  - b) provide a high quality environment;

- c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
- d) have regard to biodiversity and the creation of green corridors;
- e) have regard to acoustic design to minimise noise and create tranquil spaces.

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

### ***DM19.2 Biodiversity and urban greening***

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

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

### ***CS20 Improve retail facilities***

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

#### ***DM20.1 Principal shopping centres***

1. Within Principal Shopping Centres (PSCs) the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Proposals for changes between retail uses within the PSC will be assessed against the following considerations:

- a) maintaining a clear predominance of A1 shopping frontage within PSCs, refusing changes of use where it would result in more than 2 in 5 consecutive premises not in A1 or A2 deposit taker use;
- b) the contribution the unit makes to the function and character of the PSC;
- c) the effect of the proposal on the area involved in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.

2. Proposals for the change of use from shop (A1) to financial and professional service (A2) restaurant and cafes (A3) drinking establishments (A4) or hot food takeaways (A5), use at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre.

## ***CS21 Protect and provide housing***

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

### ***DM21.3 Residential environment***

1. The amenity of existing residents within identified residential areas will be protected by:
  - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
  - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

### **Relevant Local Plan Policies**

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

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

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

To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term

viable office use and there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons:

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

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

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

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

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

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

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

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

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

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

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

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

- 1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.
- 2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:
  - a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply (TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
  - b) reasonable gas and water supply considering the need to conserve natural resources;
  - c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
  - d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
  - e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.
- 3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.
- 4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City

Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

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

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

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

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

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

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

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

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

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

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;

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

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

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

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

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

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;

- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

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

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

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

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

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

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

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;



- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

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

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

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

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

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

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

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

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

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

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

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

### ***DM11.1 Visitor, Arts and Cultural***

- 1) To resist the loss of existing visitor, arts and cultural facilities unless:
  - a) replacement facilities are provided on-site or within the vicinity which meet the needs of the City's communities; or
  - b) they can be delivered from other facilities without leading to or increasing any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on the site; or
  - c) it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.
- 2) Proposals resulting in the loss of visitor, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floorspace has been actively marketed as a visitor, arts or cultural facility at reasonable terms.

### ***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.

#### ***DM12.2 Development in conservation areas***

- 1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
- 2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
- 3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement

building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

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

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

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

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

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

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

### ***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.

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

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

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

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

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

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



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

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

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

#### ***DM16.4 Encouraging active travel***

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.
2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

#### ***DM16.5 Parking and servicing standards***

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and

with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.
5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

### ***CS17 Minimising and managing waste***

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

#### ***DM17.1 Provision for waste***

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

### ***DM17.2 Designing out construction waste***

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

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

### ***CS18 Minimise flood risk***

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

#### ***DM18.1 Development in Flood Risk Area***

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
  - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
  - b) the benefits of the development outweigh the flood risk to future occupants;
  - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.
2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:
  - a) all sites within the City Flood Risk Area as shown on the Policies Map; and
  - b) all major development elsewhere in the City.
3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.
4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.
6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

### ***DM18.2 Sustainable drainage systems***

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

### ***DM18.3 Flood protection and climate***

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

### ***CS19 Improve open space and biodiversity***

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

#### ***DM19.1 Additional open space***

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

2. New open space should:
  - a) be publicly accessible where feasible; this may be achieved through a legal agreement;
  - b) provide a high quality environment;
  - c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
  - d) have regard to biodiversity and the creation of green corridors;
  - e) have regard to acoustic design to minimise noise and create tranquil spaces.
3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

### ***DM19.2 Biodiversity and urban greening***

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

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

### ***CS20 Improve retail facilities***

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

### ***DM20.1 Principal shopping centres***

1. Within Principal Shopping Centres (PSCs) the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Proposals for changes between retail uses within the PSC will be assessed against the following considerations:
  - a) maintaining a clear predominance of A1 shopping frontage within PSCs, refusing changes of use where it would result in more than 2 in 5 consecutive premises not in A1 or A2 deposit taker use;
  - b) the contribution the unit makes to the function and character of the PSC;
  - c) the effect of the proposal on the area involved in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.

2. Proposals for the change of use from shop (A1) to financial and professional service (A2) restaurant and cafes (A3) drinking establishments (A4) or hot food takeaways (A5), use at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre.

### ***CS21 Protect and provide housing***

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

### ***DM21.3 Residential environment***

1. The amenity of existing residents within identified residential areas will be protected by:
  - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
  - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

## SCHEDULE

APPLICATION: 21/00538/FULEIA

### 120 Fleet Street London EC4A 2BE

**Demolition of the existing River Court building at 120 Fleet Street, including part demolition of the basement and the erection of a new building comprising two basement levels and ground floor plus 20 upper storeys (93.15m AOD) including retail, commercial, office and service use (Class E). Creation of new pedestrian routes.**

**Change of use of Daily Express Building from office (Use Class E) to learning and non-residential institutions use (Class F1), retail, flexible learning and non-residential institutions and commercial use (Class E), Alterations to and refurbishment of the existing Grade II\* listed Daily Express Building at 120 Fleet Street, including works to detach the building from the River Court with demolition of part of linking floorplate and structure from basement level 01 to level 06, demolition of roof and installation of new roof with associated roof garden, erection of new north facade, retention of south-east curved corner and part demolition of existing east facade from ground level to level 05, erection of new facade and shopfront and associated works.**

## 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 any stripping-out or demolition of the existing building, an updated 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 re-used 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 Plans: London Plan; GG5, GG6, D3, SI 7, SI 8 - Local Plan; CS17, 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.

- 3 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, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.  
REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: 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.
- 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 GLA at [ZeroCarbonPlanning@london.gov.uk](mailto:ZeroCarbonPlanning@london.gov.uk) and the Local Planning Authority, demonstrating that the Whole Life Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's aspirational benchmarks set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life cycle of the development.  
REASON: To ensure that the GLA and the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.
- 5 Before any works including demolition are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels



at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 6 Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.

REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 7 Prior to the commencement of development, an updated Energy Assessment confirming the detailed design stage opportunities for carbon reduction from the building's is required to be submitted to and approved by the Local Planning Authority.

REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

- 8 No cranes shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport.

REASON: To ensure that the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport or London City Airport through penetration of the regulated airspace

- 9 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.  
REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.
- 10 Prior to the commencement of development, the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the 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
- 11 Prior to the commencement of the development a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall

also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.

REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

- 12 There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)  
REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.
- 13 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.  
REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.
- 14 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 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.

- 15 No development other than demolition shall take place until the detailed design of all wind mitigation measures and a tree planting plan 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 and location, 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 and to protect the approved new public realm within the site, arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.

REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 17 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems including blue roofs, rainwater pipework, flow control devices, pumps, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 1.7 litres per second from no more than one distinct outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 100m<sup>3</sup>;
  - (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works; and
  - (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.
- REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.
- 18 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) A Lifetime Maintenance Plan for the SuDS system to include:
    - A full description of how the system would work, it's aims and objectives and the flow control arrangements;
    - A Maintenance Inspection Checklist/Log;
    - A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required, and the costs incurred to maintain the system.
- REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.
- 19 Before any construction works hereby permitted are begun details of rainwater harvesting and grey water recycling systems shall be submitted to and approved in writing by the local planning authority.
- REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 20 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.  
REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 21 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 and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces, including details of compliance with approved Circular Economy Strategy;
  - (b) details of the proposed new facades including details of a typical bay of the development for each façade, fenestration, soffits, handrails and balustrades;
  - (c) details of canopies;
  - (d) irrespective of approved drawings, typical façade details, including jointing and any necessary expansion/movement joints;
  - (e) irrespective of approved drawings details of ground and first floor elevations including all entrances, integrated seating, vitrines and information boards;
  - (f) full details of the public roof terrace, including all elevations, entrances, fenestration, planters, seating, lighting, soffit, drainage, irrigation and any infrastructure required to deliver programming and varied uses;
  - (g) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;
  - (h) details of all drainage, irrigation and rainwater harvesting;
  - (i) details of the integration of M&E and building services into the external envelope;
  - (j) irrespective of approved drawings, final details and layout of the publicly accessible roof terrace and core to the Daily Express Building
- REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

- 22 Before the works thereby affected are begun, sample panels of agreed sections of the facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details.  
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.
- 23 All unbuilt surfaces, including the amenity terraces, public roof terrace, arcade street/new public route and trees approved for wind mitigation, shall be treated in accordance with a landscaping scheme, including details of:
- (a) Additional tree planting and public seating on the proposed new routes, Fleet Street, St Bride Street and Shoe Lane
  - (b) Irrigation;
  - (c) Provision for harvesting rainwater run-off from road to supplement irrigation;
  - (d) Spot heights for ground levels around planting pit;
  - (e) Soil;
  - (f) Planting pit size and construction;
  - (g) Tree guards; and
  - (h) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development.
- to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.  
REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.
- 24 Details of a holistic urban greening strategy, including hard landscaping, materials and an appropriate maintenance regime for
- (a) the cascade of roof terraces and surfaces, to include green roofs, hedges, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening;
  - (b) the incorporation of blue roofs into roof surfaces; and
  - (c) the landscaping of the public realm
- 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.

- 25 Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.

REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.

- 26 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.

- 27 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the retail uses (Class E and sui generis) and any Class E (office) kitchens. Flues must terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the said use takes place and retained for the life of the building.



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

- 28 No cooking shall take place within any Class E or sui generis use hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

- 29 All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

- 30 Prior to first occupation confirmation shall be provided that either: all water network upgrades required to accommodate the additional flows to serve the development have been completed; or a housing and infrastructure phasing plan has been agreed with Thames Water to allow occupation. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.

- 31 Once the building construction is completed and prior to the building being occupied (or handed over to a new owner, if applicable), the legal owner(s) of the development shall submit the post-completion report in line with the criteria set out in the GLA's Circular Economy Statement Guidance that shall be approved in writing by the Local Planning Authority, and that confirms the targets and actual outcomes achieved, clearly indicates where and why any variation has occurred and provides a summary of important lessons learned.

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 London Plan.

- 32 Before any retail units are occupied the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) A signage strategy for the retail units within the development shall be submitted;
  - (b) The signage relating to the public roof terrace shall also be included within the overall 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, DM10.5, DM10.8, DM12.1, DM12.2 and DM15.7.
- 33 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.
- 34 (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.
- 35 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

- 36 Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.  
REASONS: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.
- 37 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.  
REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
- 38 Post construction BREEAM assessments for all uses, demonstrating that a target rating of 'Outstanding for the new office building and 'Excellent' for the other uses has been achieved, shall be submitted as soon as practicable after practical completion.  
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.
- 39 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 London Plan.

- 40 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 1,037 long stay pedal cycle spaces, and a minimum of 85 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.
- 41 A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.  
REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy T5 cycling, emerging City Plan policy 6.3.24.
- 42 Before any works thereby affected are begun, the layout and the arrangement of the long stay and short stay cycle parking shall be submitted to and approved in writing by the Local Planning Authority in consultation with Transport for London. The cycle parking detailed in the approved arrangement plans and report shall thereafter be maintained in accordance with the approved plan(s) for the life of the building.  
REASON: To ensure the cycle parking is accessible and has regard to compliance with the London Cycling Design Standards in accordance with the following policy of the Local Plan: DM16.3 and London Plan policy: T5
- 43 Unless otherwise agreed in writing by the Local Planning Authority a minimum of 90 showers and 1029 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.  
REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 44 A clear unobstructed minimum headroom of 5m must be maintained for the life of the building in the refuse skip collection area as shown on the approved drawings and a clear unobstructed minimum headroom of 4.75m must be provided and maintained over the remaining areas and access ways.  
REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with the following policy of the Local Plan: DM16.5.

- 45 Except as may be approved in writing by the Local Planning Authority the loading and unloading areas at basement level must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.  
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.
- 46 Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of 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: DM16.1, DM16.5, DM21.3.
- 47 Facilities must be provided and maintained for the life of the development so that vehicles may enter and leave the building by driving in a forward direction.  
REASON: To ensure satisfactory servicing facilities and in the interests of public safety in accordance with the following policy of the Local Plan: DM16.5.
- 48 Three electric charging points must be provided within the delivery and servicing area and retained for the life of the building.  
REASON: To further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS16 and draft Local Plan 2036 Policy VT2.
- 49 No servicing of the premises shall be carried out between the hours of 07:00 - 10:00, 12:00 - 14:00 and 16:00 - 19:00 on Monday to Friday. 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: the Local Plan: DM16.1, draft City Plan 2036: VT2 - 4
- 50 The threshold of all vehicular and pedestrian access points shall be at the same level as the rear of the adjoining footway.  
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
- 51 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.

- 52 The two car parking space suitable for use by disabled people shall be provided on the premises in accordance with the drawings hereby approved and shall be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors.  
REASON: To ensure provision of suitable parking for disabled people in accordance with the following policies of the Local Plan: DM16.5, Draft Local Plan: VT3, London Plan: 6.13D and 6A.2 and London Plan: T6.5.
- 53 Two electric charging points must be provided for the blue badge parking spaces and retained for the life of the building.  
REASON: To further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS16 and draft Local Plan 2036 Policy VT2.
- 54 Unless otherwise approved by the Local Planning Authority, no plant or telecommunications equipment shall be installed on the exterior of the building, including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.  
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 55 The pass doors shown adjacent to or near the to the main entrance on the drawings hereby approved shall remain unlocked and available for use at all times when the adjacent revolving doors are unlocked.  
REASON: In order to ensure that disabled people are not discriminated against and to comply with the following policy of the Local Plan: DM10.8.
- 56 The roof terraces within 120 Fleet street on levels 07 to 17 and within the Daily Express Building levels 4-7 hereby permitted shall not be used or accessed between the hours of 23:00 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.
- 57 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.
- 58 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not

employees of the premises licence holder and the event is promoted to the general public.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 59 No live or recorded music that can be heard outside the premises shall be played.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 60 Fumes from Use Class E / Sui Generis affecting offices or residential:

Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Class E / Sui Generis use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class E / Sui Generis use takes place.

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

- 61 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.

- 62 Prior to the commencement of development, the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July (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.

- 63 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.

REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

- 64 The areas within the development marked as retail on the floorplans at ground and basement level hereby approved, shall be used for retail purposes within Class E (shop, financial and professional services and cafe or restaurant) and sui generis (pub and drinking establishment, and take-away) and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England)Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.2.

- 65 Unless otherwise approved in writing by the Local Planning Authority, no more than 50% of the areas marked as retail on the floorplans hereby approved shall be occupied as Food and Beverage uses.

REASON: To ensure that a varied mix of retail types is provided within the development in accordance with the following policies of the Local Plan: CS20 and of the emerging policies of the City Local Plan: S5, RE2.

- 66 The areas shown on the approved drawings above ground floor as offices, flexible retail use (Class E, drinking establishment (sui generis),



hot food takeaway (sui generis)) and public viewing gallery and winter garden with ancillary space, and as set out in Condition 64 of this decision notice, shall be used for those purposes only 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).

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

67 The development shall provide:

- 2,368sq.m Commercial, Business and Service Use (Class E);
- 2,051sq.m Retail Use (Class E (a), (b) and (c));
- 61,135sq.m Office Use (Class E);
- 1,331sq.m Learning and non-residential institutions Use (Class F1);

- 429sq.m Flexible learning and non-residential institutions use / retail purposes / bar (Use Classes F1/E (a), (b), (c) and Sui Generis);
- 2,776sq.m Flexible learning and non-residential institutions use / commercial, business and service use (Classes F1/E); and
- 8,366sq.m Plant, BOH and Storage

REASON: To ensure the development is carried out in accordance with the approved plans.

68 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:

- PA-10-000, Existing 120 Fleet Street Location Plan
- PA-10-010, Existing Basement 02 Floor Plan
- PA-10-011, Existing Basement 01 Floor Plan
- PA-10-012, Existing Basement 01 Mezzanine Daily Express
- PA-10-013, Existing Ground Level Floor Plan
- PA-10-014, Existing Upper Ground Level Floor Plan
- PA-10-015, Existing Level 01 Floor Plan
- PA-10-016, Existing Level 02 Floor Plan
- PA-10-017, Existing Level 03 Floor Plan
- PA-10-018, Existing Level 03 Mezzanine Daily Express
- PA-10-019, Existing Level 04 Floor Plan
- PA-10-020, Existing Level 05 Floor Plan
- PA-10-021, Existing Level 06 Floor Plan
- PA-10-022, Existing Level 07 Floor Plan
- PA-10-023, Existing Level 08 Floor Plan
- PA-10-024, Existing Level 09 Floor Plan
- PA-10-025, Existing Roof Plan
- PA-10-100, Existing N-S Section
- PA-10-101, Existing E-W Section
- PA-10-200, Existing Fleet Street Elevation
- PA-10-201, Existing St. Bride Elevation

PA-10-202, Existing Shoe Lane Elevation  
 PA-10-210, Existing Daily Express North Elevation  
 PA-10-211, Existing Daily Express East Elevation  
 PA-10-212, Existing Daily Express South Elevation  
 PA-10-213, Existing Daily Express West Elevation  
 PA-20-010, Demolition Basement 02 Floor Plan  
 PA-20-011, Demolition Basement 01 Floor Plan  
 PA-20-012, Demolition Basement 01 Mezzanine Daily Express  
 PA-20-013, Demolition Ground Level Floor Plan  
 PA-20-014, Demolition Upper Ground Level Floor Plan  
 PA-20-015, Demolition Level 01 Floor Plan  
 PA-20-016, Demolition Level 02 Floor Plan  
 PA-20-017, Demolition Level 03 Floor Plan  
 PA-20-018, Demolition Level 03 Mezzanine Daily Express  
 PA-20-019, Demolition Level 04 Floor Plan  
 PA-20-020, Demolition Level 05 Floor Plan  
 PA-20-021, Demolition Level 06 Floor Plan  
 PA-20-022, Demolition Level 07 Floor Plan  
 PA-20-023, Demolition Level 08 Floor Plan  
 PA-20-024, Demolition Level 09 Floor Plan  
 PA-20-025, Demolition Roof Plan  
 PA-20-100, Demolition N-S Section  
 PA-20-101, Demolition E-W Section  
 PA-20-200, Demolition Fleet Street Elevation  
 PA-20-201, Demolition St. Bride Elevation  
 PA-20-202, Demolition Shoe Lane Elevation  
 PA-30-B2, Demolition Daily Express Basement Level 02 Plan  
 PA-30-B1, Demolition Daily Express Basement Level 01 Plan  
 PA-30-B1M, Demolition Daily Express Basement Level 01 Mezzanine Plan  
 PA-30-000, Demolition Daily Express Ground Level Plan  
 PA-30-001, Demolition Daily Express Upper Ground & Level 01 Plans  
 PA-30-002, Demolition Daily Express Level 02-03 & 04 Floor Plans  
 PA-30-003, Demolition Daily Express Level 05 & 06 Floor Plans  
 PA-30-004, Demolition Daily Express Terrace Level & Roof Plans  
 PA-30-100, Demolition Daily Express N-S Section  
 PA-30-101, Demolition Daily Express E-W Section  
 PA-30-200, Demolition Daily Express Fleet Street Elevation  
 PA-30-201, Demolition Daily Express Shoe Lane Elevation  
 PA-50-B2, Proposed Basement Level 02 Floor Plan  
 PA-50-B1, Proposed Basement Level 01 Floor Plan  
 PA-50-000 Rev 01, Proposed Ground Floor Level Floor Plan  
 PA-50-UG, Proposed Upper Ground Level Floor Plan  
 PA-50-001, Proposed Level 01 Floor Plan  
 PA-50-002, Proposed Level 02 Floor Plan  
 PA-50-003, Proposed Level 03 Floor Plan  
 PA-50-004, Proposed Level 04 Floor Plan  
 PA-50-005, Proposed Level 05 Floor Plan  
 PA-50-006, Proposed Level 06 Floor Plan  
 PA-50-007, Proposed Level 07 Floor Plan

PA-50-008, Proposed Level 08 Floor Plan  
 PA-50-009, Proposed Level 09 Floor Plan  
 PA-50-010, Proposed Level 10 Floor Plan  
 PA-50-011, Proposed Level 11 Floor Plan  
 PA-50-012, Proposed Level 12 Floor Plan  
 PA-50-013, Proposed Level 13 Floor Plan  
 PA-50-014, Proposed Level 14 Floor Plan  
 PA-50-015, Proposed Level 15 Floor Plan  
 PA-50-016, Proposed Level 16 Floor Plan  
 PA-50-017, Proposed Level 17 Floor Plan  
 PA-50-018, Proposed Level 18 Floor Plan  
 PA-50-019, Proposed Level 19 Floor Plan  
 PA-50-020, Proposed Level 20 Floor Plan  
 PA-50-RF Rev 01, Proposed Roof Plan  
 PA-60-100, Proposed Section AA'  
 PA-60-101, Proposed Section BB'  
 PA-60-102, Proposed Section CC'  
 PA-60-103, Proposed Section DD'  
 PA-70-200, Proposed Context Elevations  
 PA-70-201, Proposed North Elevation  
 PA-70-202, Proposed East Elevation  
 PA-70-203, Proposed South Elevation  
 PA-70-204, Proposed West Elevation  
 PA-80-B2, Proposed Daily Express Basement Level 02 Plan  
 PA-80-B1, Proposed Daily Express Basement Level 01 Plan  
 PA-80-000, Proposed Daily Express Ground Level Plan  
 PA-80-001, Proposed Daily Express Upper Ground & Level 01 Plans  
 PA-80-002, Proposed Daily Express Level 02-03 & 04 Floor Plans  
 PA-80-003, Proposed Daily Express Level 05 & 06 Floor Plans  
 PA-80-004, Proposed Daily Express Terrace Level & Roof Plans  
 PA-80-100, Proposed Daily Express N-S Section  
 PA-80-101, Proposed Daily Express E-W Section  
 PA-80-200, Proposed Daily Express North Elevation  
 PA-80-201, Proposed Daily Express East Elevation  
 PA-80-202, Proposed Daily Express South Elevation  
 PA-80-203, Proposed Daily Express West Elevation  
 PA-90-001, Daily Express Building Typical Façade Detail  
 PA-90-002, Proposed New Building Typical Façade Detail  
 PA-90-003, Proposed New Building Typical GF Façade Detail  
 PA-90-004, Proposed New Building Louvered Façade Detail  
 PA-90-005, Proposed New Building Ground Floor Façade Details  
 8353-PL-GA-100, Landscape General Arrangement - Ground level  
 8353-PL-GA-101 Rev 01, Landscape General Arrangement - Terrace levels  
 8353-PL-UGF-102, Landscape General Arrangement - Urban Greening Factor  
 8353-DE-SD-301, Soft landscape details - Edge planter details  
 8353-DE-SD-302, Soft landscape details - Edge planter details  
 8353-DE-SD-303, Soft landscape details - Edge planter details  
 8353-DE-SD-304, Soft landscape details - Edge planter details

8353-DE-SD-305, Soft landscape details - Edge planter details  
8353-DE-SD-308, Soft landscape details - Terrace sections  
8353-DE-SD-309, Soft landscape details - Terrace sections

## INFORMATIVES

- 1 During the construction phase of the development, the City of London Corporation encourages all owners/developers to commit to the principles outlined in the City of London Corporation's Local Procurement Charter, i.e.
  - to identify opportunities for local small to medium sized businesses to bid/tender for the provision of goods and services;
  - aim to achieve the procurement of goods and services, relating to the development, from small to medium sized businesses based in the City and the surrounding boroughs, towards a target of 10% of the total procurement spend;
  - or where the procurement of goods and services is contracted out
  - ensure the above two principles are met by inserting local procurement clauses in the tender documentation issued to contractors or subcontractors (further information can be found in our 'Guidance note for developers').

For additional details please refer to the City of London's 'Local Procurement Charter' and 'Local Procurement - Guidance Note for City Developers'. These documents can be found at [http://www.cityoflondon.gov.uk/Corporation/LGNL\\_Services/Environment\\_and\\_planning/Planning](http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Planning)

Further guidance can be obtained by contacting the 'City Procurement Project' which provides free advice to City based businesses and City developers. They can signpost you to local supplier databases, give one to one advice and provide written guidance via the City of London Corporation's Local Purchasing Toolkit and other resources.

To access free support in procuring locally please call 020 7332 1532 or email [city.procurement@cityoflondon.gov.uk](mailto:city.procurement@cityoflondon.gov.uk)
- 2 The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office £185 sq.m  
Retail £165 sq.m  
Hotel £140 sq.m  
All other uses £80 per sq.m

These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of £75 per sq.m for offices, £150 per sq.m for Riverside Residential, £95 per sq.m for Rest of City Residential and £75 for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy.

Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: [www.planningportal.gov.uk/cil](http://www.planningportal.gov.uk/cil)).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

- 3 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:  
detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;  
a full pre application advice service has been offered;  
where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.
- 4 This permission must in no way be deemed to be an approval for the display of advertisement matter indicated on the drawing(s) which must form the subject of a separate application under the Advertisement Regulations.
- 5 Where groundworks not shown on the approved drawings are to take place below the level of the existing structure (including works for underpinning, new lift pits, foundations, lowering of floor levels, new or replacement drainage, provision of services or similar) prior notification should be given in writing to the Environment Department in order to determine whether further consents are required and if the proposed works have archaeological implications.
- 6 If a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane, as per the requirements set out by CAP1096.

- 7 Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) .  
The following details should be provided before the crane is erected:
- the crane's precise location
  - an accurate maximum height
  - start and completion dates
- 8 This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.
- 9 This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation or Transport for London as Highway Authority; and work must not be commenced until the consent of the Highway Authority has been obtained.
- 10 Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.
- 11 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.
- 12 The Department of the Built Environment (Transportation & Public Realm Division) must be consulted on the following matters which require specific approval:
- (a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.
  - (b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the Department of the Built Environment Transportation and Public Realm Division is recommended to ensure the design of the building provides for the inclusion of street lighting.
  - (c) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath,

over or into any public way (including any cleaning equipment overhanging any public footway or carriageway).

You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. Please contact the Corporate Property Officer, City Surveyor's Department.

(d) Bridges over highways

(e) Permanent Highway Stopping-Up Orders and dedication of land for highway purposes.

(f) Connections to the local sewerage and surface water system.

(g) Carriageway crossovers.

(h) Servicing arrangements, which must be in accordance with the City of London Corporation's guide specifying "Standard Highway and Servicing Requirements for Development in the City of London".

- 13 In accordance with S153 of the Highways Act 1980 no doors, gates or windows at ground floor level shall open over the public highway.

- 14 The Markets and Consumer Protection Department (Environmental Health Team) must be consulted on the following matters:

(a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has already been granted, further planning approval will also be required.

(b) Installation of engine generators using fuel oil.

(c) The control of noise and other potential nuisances arising from the demolition and construction works on this site the Department of Markets and Consumer Protection should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.

(d) Alterations to the drainage and sanitary arrangements.

(e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments in particular:

- the identification, encapsulation and removal of asbestos in accordance with a planned programme;

- provision for window cleaning (internal and external) to be carried out safely.

(f) The use of premises for the storage, handling, preparation or sale of food.

(g) Use of the premises for public entertainment.

(h) Approvals relating to the storage and collection of wastes.

(i) The detailed layout of public conveniences.

(j) Limitations which may be imposed on hours of work, noise and other environmental disturbance.

(k) The control of noise from plant and equipment;

(l) Methods of odour control.

- 15 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:
- Noise and Dust
- (a)  
The construction/project management company concerned with the development must contact the Department of Markets and Consumer Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work. Restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.
- (b)  
Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise, dust etc. The code can be accessed through the City of London internet site, [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk), via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department.
- (c)  
Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act 1974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the Environmental Protection Act 1990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.
- (d)  
Deconstruction or Construction work shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise from the site has been submitted to and approved by the Markets and Consumer Protection Department including payment of any agreed monitoring contribution.
- Air Quality
- (e)  
Compliance with the Clean Air Act 1993  
Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.
- Boilers and CHP plant
- (f)



The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NO<sub>x</sub> emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2015.

(g)

All gas Combined Heat and Power plant should be low NO<sub>x</sub> technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2015.

When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Markets and Consumer Protection Department would prefer developers not to consider installing a biomass burner as the City is an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread use of these appliances has the potential to increase particulate levels in London to an unacceptable level. Until the Markets and Consumer Protection Department is satisfied that these appliances can be installed without causing a detriment to the local air quality they are discouraging their use. Biomass CHP may be acceptable providing sufficient abatement is fitted to the plant to reduce emissions to air.

(i)

Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

Standby Generators

(j)

Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection.

(k)

There is a potential for standby generators to give out dark smoke on start up and to cause noise nuisance. Guidance is available from the Department of Markets and Consumer Protection on measures to avoid this.

Cooling Towers

(l)

Wet cooling towers are recommended rather than dry systems due to the energy efficiency of wet systems.

Ventilation of Sewer Gases

(o)

The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these ventilation grills have been blocked up by Thames Water Utilities. These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Markets and Consumer Protection strongly recommends that a sewer vent pipe be installed in the building terminating at a safe outlet at roof

level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

#### Food Hygiene and Safety

(p)

Further information should be provided regarding the internal layout of the proposed food/catering units showing proposals for staff/customer toilet facilities, ventilation arrangements and layout of kitchen areas.

(q)

If cooking is to be proposed within the food/catering units a satisfactory system of ventilation will be required. This must satisfy the following conditions:

Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance;

The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. It cannot be assumed that ductwork will be permitted on the exterior of the building;

Additional methods of odour control may also be required. These must be submitted to the Markets and Consumer Protection Department for comment prior to installation;

Ventilation systems for extracting and dispersing any emissions and cooking smells to the external air must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent such smells and emissions adversely affecting neighbours.

- 16 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.
- 17 The Crime Prevention Design Advisor for the City of London Police should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.
- 18 The investigation and risk assessment referred to in the schedule of conditions must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme must be submitted to and approved in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report must be submitted to and approved in writing by the Local Planning Authority. The report of the findings must include:
  - (i) a survey of the extent, scale and nature of contamination;
  - (ii) an assessment of the potential risks to:

- human health,
  - property (existing or proposed) including buildings, open spaces, service lines and pipes,
  - adjoining land,
  - groundwaters and surface waters,
  - ecological systems,
  - archaeological sites and ancient monuments;
- (iii) an appraisal of remedial options, and proposal of the preferred option(s).

This investigation and risk assessment must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

- 19 The grant of approval under the Town and Country Planning Acts does not overcome the need to also obtain any licences and consents which may be required by other legislation. The following list is not exhaustive:

(a) Fire precautions and certification:

London Fire Brigade, Fire Prevention Branch  
5-6 City Forum  
City Road  
London EC1N 2NY

(b) Public houses, wine bars, etc.

City of London Corporation  
Trading Standards and Veterinary Service  
PO Box 270  
Guildhall  
London EC2P 2EJ

(c) Inflammable materials (e.g., petroleum)

London Fire Brigade, Petroleum Department  
5-6 City Forum  
City Road  
London EC1N 2NY

(d) Works affecting Transport for London operational land and structures:

Borough Integration and Partnerships  
Transport for London  
Windsor House  
42-50 Victoria Street  
London, SW1H 0TL

(e) Works affecting a GLA road:

Borough Integration and Partnerships  
Transport for London  
Windsor House  
42-50 Victoria Street  
London, SW1H 0TL

- 20 The Directorate of the Built Environment (District Surveyor) should be consulted on means of escape and constructional details under the Building Regulations and London Building Acts.

- 21 Consent may be needed from the City Corporation for the display of advertisements on site during construction works. The display of an advertisement without consent is an offence. The City's policy is to restrain advertisements in terms of size, location, materials and illumination in order to safeguard the City's environment. In particular, banners at a high level on buildings or scaffolding are not normally acceptable. The Built Environment (Development Division) should be consulted on the requirement for Express Consent under the Town & Country Planning (Display of Advertisements) (England) Regulations 2007.
- 22 Access for people with disabilities is a material consideration in the determination of planning applications. The City of London Corporation has published design standards giving advice on access for people with disabilities and setting out the minimum standards it expects to see adopted in the City buildings. These can be obtained from the City's Access Adviser, Chief Planning Officer and District Surveyor. Further advice on improving access for people with disabilities can be obtained from the City's Access Adviser. Your attention is drawn to the Disability Discrimination provisions of the Equality Act 2010 to ensure that disabled people are not significantly disadvantaged.

Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.