

THIS IS AN EXTERNAL EMAIL

Good Afternoon,

It is highly recommended that the CAA (arops@caa.co.uk) and the Defence Geographic Centre (dvof@mod.gov.uk) are notified about future cranes

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Please see attached consultation for 120 Fleet Street London EC4A 3BE
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of:

Kurt Gagen
Department of the Built Environment

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From: [ROSSI, Sacha](#)
To: [PLN - Comments](#)
Cc: [NATS Safeguarding](#)
Subject: RE: Planning Application Consultation: 21/00538/FULEIA [SG30411]
Date: 19 July 2021 17:59:56
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)

THIS IS AN EXTERNAL EMAIL

Our Ref: LHR4969 - SG30411

Dear Sir/Madam

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

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

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

Yours faithfully
S. Rossi
NATS Safeguarding Office

NATS

NATS Safeguarding

E: natssafeguarding@nats.co.uk

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

NATS

Sacha Rossi
ATC Systems Safeguarding Engineer

D: 01489 444205

E: sacha.rossi@nats.co.uk

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL



NATS Public

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

Sent: 14 July 2021 12:53

To: NATS Safeguarding <NATSSafeguarding@nats.co.uk>

Subject: Planning Application Consultation: 21/00538/FULEIA

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

Dear Sir/Madam

Please see attached consultation for 120 Fleet Street London EC4A 2BE .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Kurt Gagen

Department of the Built Environment

City of London

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NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.

26 July 2021

Mr K Gagen
Development Division
Department of the Built Environment
City of London

By email to PLNComments@cityoflondon.gov.uk

Dear Mr Gagen,

Re: 120 Fleet Street and Daily Express building EC4A 2BE
Your ref: 21/00538/FULEIA

Thank you for your notice of 14 July 2021. We are residents of Sovereign House at 5 Poppins Court.

120 Fleet Street is a substantial property but is currently unoccupied. We therefore recognise the benefits to the area of a development of this building and the regeneration that will accompany it. However, we note that there are significant impacts on the environment, local residents and neighboring businesses that will result from the proposal. We expect these aspects to be taken into consideration in the determination of the application.

In particular, we would want you to take into account the following points:

1. We object to the height of the proposed new building. Even with its stepped design, a building of 21 floors will be overbearing in this setting and detrimental to the visual appearance of the area, particularly to St Brides Street.
2. The proposed development will adversely affect the amenities of occupiers of residential properties in the vicinity through loss of light, sunlight and overshadowing due to its nearness to Poppins Court:
 - a. Poppins Court will be narrowed, especially from the second to fifth floors of the proposed building.
 - b. The existing building at 120 Fleet Street (the "GS building") is 4 storeys at the Poppins Court elevation and the proposed building would increase this to six, plus a further 7 floors slightly tapering away.
 - c. The resulting loss of daylight, sunlight and overshadowing that will occur is acknowledged in the application as having a major impact (chapter 11 para. 11.13 of the ES). This will be permanent. Several of the Sovereign House apartments have windows onto that elevation, including ours on the third floor. We attach photographs. Amendments to the scheme should be sought to address this issue.
3. The proposed scheme will have a significant impact on local residents and businesses during the refurbishment, demolition and construction (see para 11.8 of the ES). No mitigation is proposed but the applicant seeks conditions. We believe the noise and disturbance will be intolerable without amendments to Sovereign House, which is an old building poorly equipped to neighbour such a scheme. For example, double glazing and air conditioning would go some way to mitigate noise and dust pollution.
4. We welcome the proposed improvements to passageways, new walkways and the permeability of the building. Ground floor retail would also add interest to the street scene in St Brides Street, Poppins Court and Shoe Lane. However, the concept of increased retail in

this area should be regarded with caution as most existing stores are closed at weekends through lack of footfall.

5. Similarly, we welcome public access to the listed building. However, we do question the proposed uses of the space; are exhibition and event spaces viable in this predominantly commercial area?
6. Conditions should be imposed on the permitted uses of the non-commercial elements to protect the amenity of local residents. Potential uses in particular that we would object to are:
 - a. Restaurant, café or drinking establishments should not be permitted above ground floor (for example on the roof-top green spaces)
 - b. Roof-top green spaces are planned but should not be used outside office hours for events
 - c. The inevitable increase in food retail will bring litter to Poppins Court. The scheme should incorporate a cleaning programme to address this.
7. We like the design of the proposed new building fronting Fleet Street with its horizontal banded façade, but feel that this should have a stronger vertical element to reflect the Daily Express building.
8. We support in principle the proposal to restore the Daily Express building. The conservation of this grade ii* heritage asset must be given great weight in the scheme and if approved it should be undertaken prior to the new building being occupied.
9. We support the principle of urban greening but feel that 1,950sqm out of 50,550sqm is insignificant. A greater proportion of the building needs to be dedicated to green space to increase biodiversity in a meaningful way.

Please acknowledge receipt of this letter.

Yours sincerely,

Ian and Debra Starkey



Subject:
Date:

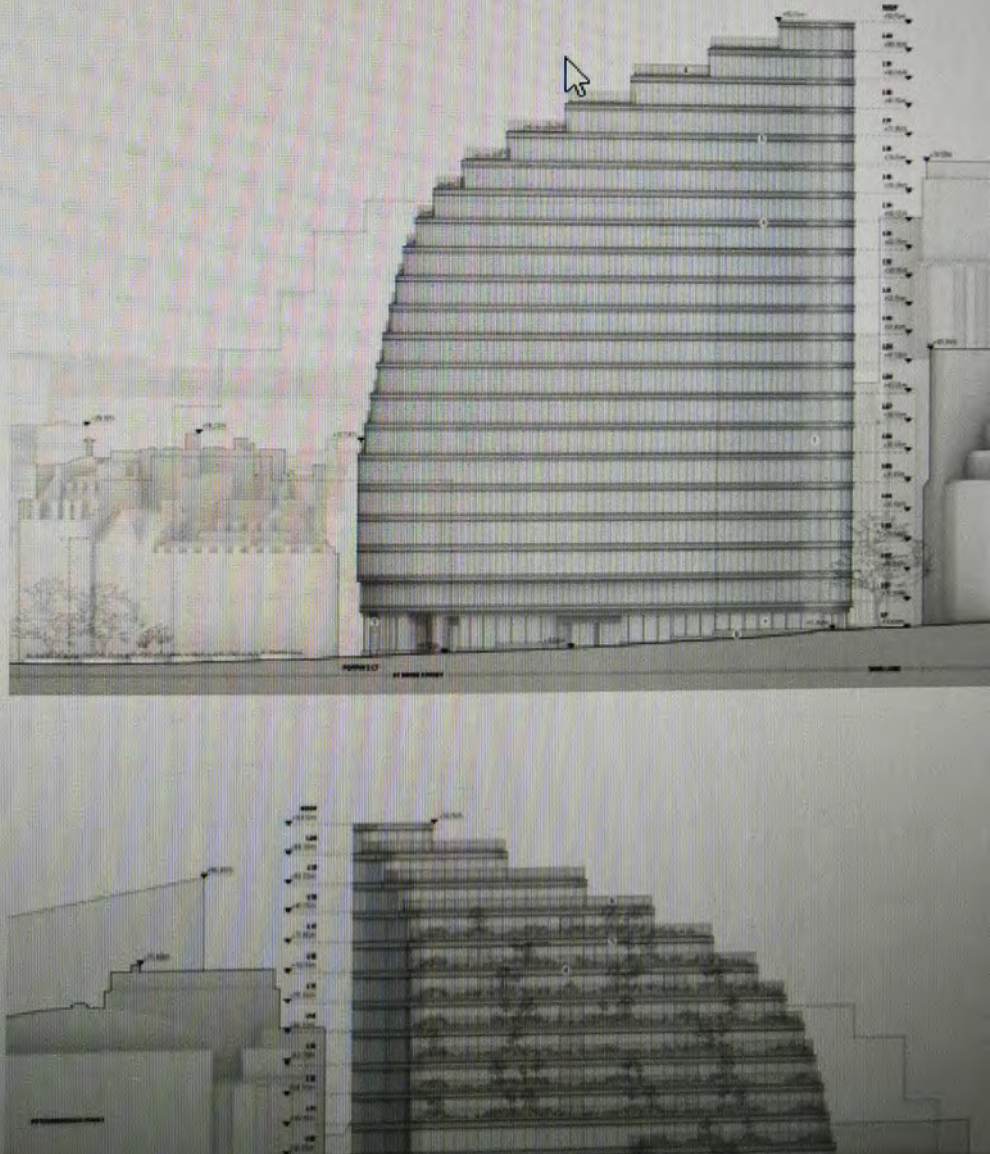


Photos
26 July 2021 17:37:14



120 Fleet Street Chapter 4: The Proposed

Figure 4.5 The Proposed New Building North (top), south (bottom)





Historic England

Mr Kurt Gagen

Direct Dial: 020 7973 3774

City of London Corporation

PO Box 270

Our ref: P01433606

Guildhall

London

EC2P 2EJ

27 July 2021

Dear Mr Gagen

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

**120 FLEET STREET, LONDON, EC4A 2BE
Application No. 21/00538/FULEIA**

Thank you for your letter of 14 July 2021 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

In summary, we welcome the proposed works associated with the listed building, and have no objection in principle to the redevelopment of the Rivercourt House. However, the proposed increase in scale will cause some (less than substantial) harm to the significance of designated heritage assets further afield. We believe this harm could be largely mitigated through a reduction in height of the proposed building.

Historic England Advice
Significance



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

Telephone 020 7973 3700
HistoricEngland.org.uk



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

The principal significance of the site is reflected in the Grade II* listed building. Completed in 1932 to a design by Sir Owen Williams and Ellis E. Clarke for the headquarters of the Daily Express, this building, with its innovative and stylish glass and Vitrolite exterior and its expressive interiors (designed by Robert Atkinson), is considered to be one of the most important Art Deco office buildings in London.

Its current form, partially embedded within Rivercourt House, is a result of restoration works from 1999 that reinstated the original Fleet Street frontage following demolition of Aitken House. Aitken House had in 1977 extended the original Daily Express building significantly to the east and reduced its prominence along Fleet Street. The 1999 restoration created a rounded corner to the east (to match the existing to the west), thereby providing the building with a stand alone presence for the first time.

Whilst the 1999 restoration works were widely welcomed, they resulted in the historic building remaining embedded in the new Rivercourt House behind, with the fine Art Deco interiors restored but inaccessible to the public.

Rivercourt House currently occupies a large block to the north of the listed building and is part of an area that has been comprehensively redeveloped in recent years. It lies outside the boundaries of Fleet Street Conservation Area.

The development site is visible from well beyond the immediate area. In particular, the site forms part of the skyline beyond the Embankment when viewed from Gabriel's Wharf in a protected view (LVMF 16B.1). The relatively low backdrop is important to the setting of the historic areas at Embankment and the Temple, and contributes to the significance of these conservation areas.

The proposals and their impact

The proposals are to demolish the existing Rivercourt House and replace it with a 22 storey office building that steps down from the north to form a series of terraces. New permeable routs are proposed through the currently impenetrable block, including the creation of space at the back of the Grade II* listed building and physically separating it from the new development.

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.

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, we believe this harm is in the middle of the less than substantial spectrum.

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 policy.

Relevant policy

Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 make it a statutory duty for Local Planning Authorities to have special regard to the desirability of preserving the listed building or its setting.

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

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

Paragraph 199 states that when considering the impact of a proposed development on a heritage asset (which includes its setting), local planning authorities should give 'great weight' to preserving the asset's significance. Any harm or loss should require clear and convincing justification (paragraph 200).

Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced, and makes it clear at paragraph 197 that local authorities, when considering proposals that affect a heritage asset, should seek to avoid or minimise any conflict between the conservation of the heritage asset and any aspect of the proposal.

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



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

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HistoricEngland.org.uk



If the harm is deemed to be less than substantial, paragraph 202 of the NPPF requires that harm to be weighed against the public benefits of the proposals.

Historic England position

We 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. We recognise the potential for a range of public benefits (including heritage enhancements and public realm improvements) resulting from the proposals.

We 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.

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).

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,).

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.

However, we are unable to support the current proposal for the reasons set out above.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

Your authority should take these representations into account and seek amendments,



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

Telephone 020 7973 3700
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Historic England

safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

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

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

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

Yours sincerely

Michael Dunn

Principal Inspector of Historic Buildings and Areas

E-mail: michael.dunn@HistoricEngland.org.uk



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

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

Kurt Gagen
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2021/133479/01-L01
Your ref: 21/00538/FULEIA
Date: 29 July 2021

Dear Kurt,

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. (The proposal would provide 61,135sq.m GIA of Class E offices, 2,051sq.m GIA of flexible retail use (Class E), 2,748sq.m GIA of Sui Generis public roof terrace, 1,331sq.m GIA of learning and non-residential institution use (Class F1), 2,776sq.m GIA of flexible and non-residential institutions/commercial business and service; Total floorspace 78,456sq.m GIA. Overall height 93.15m AOD). The application is accompanied by an Environmental Statement.

120 Fleet Street, London, EC4A 2BE.

Environment Agency Position

The Environment Agency is a statutory consultee on all development projects subject to Environmental Impact Assessment. There are, no environmental constraints within our remit on this site and we therefore have no comments at this time.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

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

Yours sincerely,

Cont/d..



INVESTOR IN PEOPLE



George Lloyd
Planning Advisor

Number: +44 20302 54843

E-mail: HNL SustainablePlaces@environment-agency.gov.uk



Your ref:
My ref: 21/04817/OBS

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

Kurt Gagen
City of London
PO Box 270,
Guildhall,
London
EC2P 2EJ

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

30 July 2021

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

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

SCHEDULE

Application No.:	21/04817/OBS	Application Date:	
Date Received:	14.07.2021	Date Amended:	14.07.2021

Plan Nos: Letter from City of London dated 14 July 2021.

Address: 120 Fleet Street, London, EC4A 2BE,

Proposal: 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.

Yours faithfully

Deirdra Armsby
Director of Place Shaping and Town Planning

Note:

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



Kurt Gagen
City Of London Corporation
Department of Planning & Transportation
Development Control Team East
P O Box 270
Guildhall, London
EC2P 2EJ

Application Number: PA/21/01639
Your ref: 21/00538/FULEIA

2 August, 2021

Dear Kurt Gagen,

Place Directorate
Development Management
Town Hall, Mulberry Place
5 Clove Crescent
London
E14 2BG
www.towerhamlets.gov.uk

Enquiries to: Benjamin Coffie
Tel: 0207 364 5009
Email: Benjamin.Coffie@towerhamlets.gov.uk

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015**

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

Location	120 Fleet Street. London, EC4A 2BE
Proposal	<p>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.</p> <p>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.</p>

Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above application. I would be grateful if you would take the observations set out above into consideration:-

1. The Local Planning Authority has no comments to make.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



Jennifer Peters, Divisional Director, Planning and Building Control

Date: 03 August 2021
Our ref: 360284
Your ref: 21/00538/FULEIA



Planning Department
City of London Council
PLNComments@cityoflondon.gov.uk
Fao Kurt Gagen

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

T 0300 060 3900

BY EMAIL ONLY

Dear Mr Gagen

Planning consultation: Demolition of the existing River Court building 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.

Location: 120 Fleet Street London EC4A 2BE

Thank you for your consultation on the above dated 14 July 2021 which was received by Natural England on the same day.

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

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

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

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

European sites

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development. To meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out.

Sites of Special Scientific Interest

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development.

Sites of Special Scientific Interest Impact Risk Zones

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

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

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

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

Yours sincerely

James Moulton
Consultations Team

Annex - Generic advice on natural environment impacts and opportunities

Sites of Special Scientific Interest (SSSIs)

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

Biodiversity duty

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

Protected Species

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

Local sites and priority habitats and species

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

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

Ancient woodland, ancient and veteran trees

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

Protected landscapes

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

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

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

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

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

Landscape

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

Best and most versatile agricultural land and soils

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

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

Access and Recreation

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

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

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

Environmental enhancement

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

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

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

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.

Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

From: [REDACTED]
To: [PLN - Comments](#)
Subject: OBJECTION to both 21/00524/LBC and 21/00538/FULEIA
Date: 04 August 2021 10:47:35

THIS IS AN EXTERNAL EMAIL

Please log the below against each application, and confirm when done. Thank you.

As an architectural historian, author and lecturer with a special interest in and knowledge of the City, I object to this development. My principal concern is that the façade treatment of the ‘Proposed New Building’ – described in the application as showing “some reference to” and taking “inspiration” from the Daily Express building – is in fact far too similar to the Daily Express building in materials, form and colour and so will, when combined with the sheer scale of the Proposed New Building, have the effect of diminishing the appearance of the Daily Express building in its urban context and thus harming a Grade II*-listed heritage asset as a result.

The application specifically accepts that the Daily Express building is currently the “most noticeable [...] presence on this stretch of the street” and “a singular building in this context, of unique design and materiality”. It also correctly remarks that the existing River Court building, constructed in 1998-2000 next to the Daily Express building, “sought to re-express the distinctiveness of [the latter’s] original frontage” by using stone rather than glass and thus “providing a counterpoint” to the Daily Express building.

Despite these admissions, the proposed scheme ignores the accepted principle that new insertions in historic architecture should be distinct visually from the existing fabric and it is apparent from the computer-generated imagery provided that if the application is granted visual confusion will arise between

- the alternating, horizontal layers of clear and very dark opaque glass, thinly framed in metal and curved in plan at the corners, of the Proposed New Building and
- the alternating, horizontal layers of clear and very dark opaque glass, thinly framed in metal and curved in plan at the corners, of the Daily Express building.

It is therefore impossible to understand how the application can claim to “enhance the setting of the listed building”, or allow it to “truly stand alone” and “‘go solo’ rather than remaining a mere appendage to a more substantial neighbour”, since the exact opposite would be the case – the Daily Express building would be not merely an appendage to but actually subsumed within ‘a more substantial neighbour’, namely a vastly over-scaled (more than twice the size of the existing River Court) pastiche of itself.

This approach is justified by stating that this is the only option that permits “a unified and coherent façade treatment” that is “capable of resolving the differing scales and characters of surrounding buildings. This is simply not the case as other material and form choices are available that could achieve this aim without producing a weak copy of the Daily Express building. It is also unclear to me how the Proposed New Building can be claimed to have “its own distinct character” and “its own identity”.

It should be recorded that the River Court scheme was specifically designed to centre and celebrate the Daily Express building by removing a previous weak copy of it, Aitken House, and using stone cladding on the replacement, this last with clear direction from Corporation planners. The current application thus turns the clock back as if the previous twenty years had not happened.

The application also shows a poor understanding of and respect for the Daily Express building overall, notwithstanding the Built Heritage report. The “sensitive addition of a small area of ramped access at the Fleet Street steps to afford inclusive access to the lobby” is proposed, along with a vertical extension of the original staircase, yet no illustration of either appears. Contrary to the stated desire to restore the lobby, a significant portion of it to the south east is to be permanently walled off and used for

retail. That the same report states the building's cladding was "made possible by the use of Vitrolite panels -- a material that resembles glossy stone, but has properties more akin to glass" is highly concerning, since of course Vitrolite IS glass.

In summary, the applicant says "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." The applicant concludes that "Section 5 of [the Built Heritage report] provides this clear and convincing justification, in our view" but it does not in mine and nor, I hope, in officers' and members' in light of the facts I have outlined.

The application should be rejected.

Chris Rogers



Kurt Gagen
City of London Corporation
Guildhall
Gresham Street
London, EC2V 7HH

Sent by email: PLNComments@cityoflondon.gov.uk

04 August 2021

Our ref: 98 10 08

Dear Kurt Gagen,

21/00524/LBC and 21/00538/FULEIA - DAILY EXPRESS BUILDING, FLEET STREET, THE CITY, LONDON

The Twentieth Century Society has been notified of the above applications for Listed Building Consent and Full Planning Permission for alterations and refurbishment of the Grade II* listed Daily Express to facilitate its change of use from office to learning and non-residential institutions use, retail, flexible learning and non-residential institutions and commercial use, and for the demolition of the neighbouring River Court Building and erection of a new building comprising two basement levels and ground floor plus 20 upper storeys for retail, commercial, office and service use. The Society was consulted on the scheme at pre-application stage and provided feedback based on the comments of its advisory Casework Committee which met to review the proposals on the 17th May 2021. It appears that the pre-application scheme was not revised in response to our letter and so we repeat here some of the comments we made in May.

Background

The Daily Express was built in the early 1930s in a streamlined Art Deco style by (Sir) Owen Williams, with interiors created by Robert Atkinson. It was commissioned by the owner of the Express William Maxwell Aitken (first Baron Beaverbrook) to provide the paper with new offices and printing works. When completed in 1932, the building's east side abutted a 19th-century newspaper office. In the late 1970s, buildings on the site were demolished to allow the Express to be extended to the north and east. Known as 'Aitken House', this extension was designed in an imitation Art Deco style. In 1997-8, a new scheme was carried out by John Robertson Architects (JRA) which saw the demolition of Aitken House and construction of the existing commercial office known as 'River Court'. River Court is attached and linked internally to the Express.

The Express is of 6 storeys with a basement, and its upper 3 floors are set back on its principal elevation (its 6th floor was originally open but was internalised in the 1990s/early 2000s). In the 1990s, its black Vitrolite and clear glass cladding was largely replaced, its interiors refurbished and its extravagant 1930s entrance foyer restored. Surviving internal fixtures include original doors on the upper office levels, the principal stair (with original light fittings), landings and passenger lifts, and entrance lobby with its Eric Aumonier-designed relief sculptures representing 'Britain' and 'Empire'. River Court is restrained and stripped-back in its design and is built from stone to contrast with, and complement, the Express. It is several storeys taller than the Express but its upper storeys respectfully step back from the road elevation.

The Twentieth Century Society
70 Cowcross Street, London EC1M 6EJ



The Daily Express was Grade II* listed in 1972 and falls within the Fleet Street Conservation Area. River Court sits just outside this conservation area.

Policy

The local authority should note paragraphs 199 and 200 of the National Planning Policy Framework (NPPF) 2021 which relate to designated heritage assets:

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 199)

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 (paragraph 200)

Comments

The Twentieth Century Society welcomes the proposals to facilitate the reuse of the Daily Express and has no objections in principle to the redevelopment of the neighbouring River Court Building.

However, the Society is concerned that the proposed design for the new building will harm the setting of the Express. We consider the design to be too overbearing with its stepped elevation projecting out into the street and across the arcade space towards the listed building. The Society believes the existing stone River Court building provides an appropriate counterpoint to the Express stylistically and materially. The proposed Art Deco-inspired design will, the Society believes, lessen the impact of the Express, which stands out in terms of both style and materials as a striking streamlined curtain-walled building within an otherwise quite architecturally conservative area.

The Daily Express Building is designated Grade II* which puts it within the top 8% of listed buildings. The conservation of the building and its setting should therefore be of the utmost importance. Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 advises the local authority to "have special regard to the desirability of preserving the building or its setting or any features of architectural or historic interest which it possesses".

In the Society's opinion, the new development will also have a detrimental impact on the nearby Fleet Street Conservation Area. The Fleet Street Conservation Area Strategy states that the Express provides a "powerful visual statement", being so different in character to other buildings in the conservation area. The existing River Court building is noted in the Fleet Street Conservation Area Strategy for its "well-detailed stone-clad street frontage of proportionate scale to its neighbours". The new development will be visible from within the conservation area and we believe it will have a harmful impact on its character and significance.

The City of London's Local Plan (2015) outlines the council's commitment to good design, by "Ensuring that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces." and by "Ensuring that development has an appropriate street level presence and roofscape and a positive relationship to neighbouring buildings and spaces." (Core Strategic Policy CS10: Design).

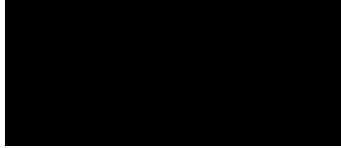
Summary

While the Twentieth Century Society welcomes the proposals for the Grade II* Express Building, it believes that the proposed neighbouring development will harm the building's setting and will have a detrimental impact on the nearby Fleet Street Conservation Area. We therefore encourage the local authority to refuse the current application for the new building (ref: 21/00538/FULEIA) and

urge the architects to reduce the proposed building's massing and height and to revise its design to be more sympathetic to its sensitive historic environment.

We hope that these comments are of use to you. Please don't hesitate to contact us if you have any questions.

Yours sincerely,



Coco Whittaker
Caseworker
Twentieth Century Society

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



From: [REDACTED]
To: [PLN - Comments](#)
Subject: Application Ref: 21/00538/FULEIA - 120 Fleet Street London EC4A 2BE
Date: 05 August 2021 10:57:47

THIS IS AN EXTERNAL EMAIL



Ancient Monuments Society
Defending Historic Buildings of all Ages and all Types

FAO: Kurt Gagen

By email: PLNComments@cityoflondon.gov.uk

Re: 120 Fleet Street London EC4A 2BE
Application Ref: 21/00538/FULEIA

Thank you for consulting us on this application. We have reviewed the documents available on your website and the Ancient Monuments Society provides the following comments:

We 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. This is a positive outcome that will enhance both the significance and appearance of this important heritage asset.

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.

NPPF (2021) paragraph 130: *"Planning policies and decisions should ensure that developments: (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); (d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;"*

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 Bishopsgate.

Of particular concern is the way the proposed building 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.

NPPF paragraph 195 notes 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.*”

Paragraph 199 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). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*”

We 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. We 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.

Please do consult the AMS again on any amended scheme.

Regards,

Ross Anthony

Case Work

Ancient Monuments Society
Registered Charity no. 209605



a: St Ann’s Vestry Hall, 2 Church Entry, London EC4V 5HB

The Ancient Monuments Society (AMS) is one of the National Amenity Societies and, as such, is a consultee on all Listed Building Consent applications involving an element of demolition as required by the *Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*. The Society also takes an interest in planning applications affecting historic buildings in conservation areas and undesignated heritage. We concern ourselves with historic buildings of all types and ages.

From: [REDACTED]
To: [Gagen, Kurt](#)
Cc: [PLN - Comments](#); [REDACTED]
Subject: Flat E, Sovereign House / 120 Fleet Street Development
Date: 09 August 2021 06:30:09

THIS IS AN EXTERNAL EMAIL

Dear Mr Gagen

We're the residents at flat E, Sovereign House, 5 Poppins Court EC4A 4AX.

With regards to the new development of 120 Fleet Street we're writing to make the following representations:

1, We request COMPENSATION due to the significant impact of demolition, construction and refurbishment works for 120 Fleet Street.

You've been aware the construction site is too close to Sovereign House building where we live. My flat windows on Poppins Court side is only 5 metres away from the boundary of construction site. The air pollution, dust, noise and any other unpredictable accidents/damages during the long lasting construction period will make my home UNLIVABLE and UNINHABITABLE! It doesn't make sense that the Developer/Contractors promise to take mitigation actions against those disturbance, as it's clear the disturbance and nuisance will definitely be inevitable whatever mitigation measures to be taken.

Our property has a buy to let mortgage in place. Sadly, no tenants would like to live in a flat just 5 metres away from a giant construction site with intolerable noise, dust and other safety and mental health problems. As a result, I would most likely have no rental income caused by the construction, which is really a disaster for us! Also it might be extremely difficult to sell our property with a normal market value in this circumstance. It's absolutely unfair! That's why we must get COMPENSATION.

Please ask the Developer to set out a detailed compensation plan before the construction works get started.

2, We object to the proposed height of new development which will make significant impact on the privacy and sufficient daylight for the residents in Sovereign House. The higher buildings will make the environment deteriorated in Fleet Street Conservative Area.

3, We object to the retail units designed in the new development. Opening retail units will inevitably bring about social problems such as tranquility of nearby residences, a cleaning surrounding, anti social behavior incidents, etc.

4, We request to make the pathway of Poppins Court widened to reach approximately 10 metres between the Development boundary and Sovereign House border. It's clear the root of all problems originates the narrow space between Sovereign House block and the construction site on Poppins Court side.

We do think the above requirements are reasonable and need to be met. We looking forward to hearing from you.

Kind regards

Xiaobing Liu & Lei Yao
Flat E, Sovereign House
5 Poppins Court EC4A 4AX
[REDACTED]

Sent from my iPad

From: [Gagen, Kurt](#)
To: [DBE - PLN Support](#)
Subject: FW: 120 Fleet Street proposals
Date: 10 August 2021 16:07:18

Sent: 09 August 2021 11:26

To: Gagen, Kurt <<mailto:Kurt.Gagen@cityoflondon.gov.uk>>

Subject: 120 Fleet Street proposals

THIS IS AN EXTERNAL EMAIL

Hello Kurt, I run the barbershop out of Poppins court, next to 120 Fleet Street, due to the covid restrictions we are hoping to re open in September. I understand the old GS building is going to be demolished and re built in what seems on the surface a new building, it's more the process and the time this will take that concerns us. We were there when the old daily express was converted to GS so I know first hand what that looks like.

Our principal concerns are based around access, noise and pollution. Also the visibility of our shop for customers. The works are proposed to take place over a number of years which is not ideal but I suppose to be expected. Whilst we support the change over in principal I hope the concerns of local business and residents are being listened too. Any thoughts you guys have on how we should proceed would be appreciated.

Many thanks

T.F.W

Tom Whall

Leonard and Michael Barbershop

Manager

From: [PLN - Comments](#)
To:
Subject: RE: Redevelopment of 120 Fleet Street London EC4A 2BE
Date: 13 August 2021 13:26:00

From:
Sent: 10 August 2021 18:26
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Subject: Redevelopment of 120 Fleet Street London EC4A 2BE

THIS IS AN EXTERNAL EMAIL

Dear Sirs

I am taking the opportunity of writing to outline my comments and concerns regarding the above proposed scheme.

I am a resident of Sovereign House, Poppins Court which is directly adjacent to this development and this proposed scheme will have substantial impact on all people who reside there.

Whilst there is an acceptance that redevelopment within the City of London area is an inevitability there are a number of elements I would ask the planning committee to take into consideration.

Firstly the maintenance of the quality of life for local residents must be at the forefront of any scheme and it is concerning that it will be taking place at the same time as the adjacent redevelopment on St. Brides Street.

At a time when working from home still remains the norm noise by the schemes will be considerable. We have had a recent extended period of experience in relation to that while dilapidations were being undertaken to 120 Fleet Street when the noise at times was so loud that it actually made Sovereign House physically shake! Despite assurances the contractors took only limited measures to contain noise and consistently worked at anti social times of the day.

In addition, there are real concerns over the quality of air for local residents during the redevelopment phase given that 120 Fleet Street is only approximately 4m away from the windows of the flats.

Turning to the scheme itself the current proposal has a substantially higher elevation at the Fleet Street end of the building which is likely to have a considerable impact upon the daylight

entering the flats, again impacting upon the quality of life for the residents. I would therefore request that consideration is given to an amendment of the design to ensure that there is no compromise in terms of the amount of light being obtained.

I would also request that full consideration is given to the noise impact which the proposed retail units on the ground floor are likely to have, given that many flats have bedroom windows which open onto Poppins Court where noise can be a real issue at night.

Finally I do also have to express concerns over the environmental impact of the redevelopment of this building. It is my understanding that it was only constructed in 1998 yet here we are facing a major redevelopment scheme and I must question the overall impact which that will have. At a time when we should all be looking to minimise the use of resources it seems somewhat crass that a relatively new and physically sound building will be demolished rather than amended.

Notwithstanding my comments above I do welcome the greater use of the former Express Newspapers building which is an iconic part of this area of the City of London.

Yours Sincerely

Tom Street
Flat M
Sovereign House



For the attention of Kurt Gagen

120 Fleet Street London EC4A 2BE

Full Planning Permission with EIA application reference 21/00538/FULEIA

The London and Middlesex Archaeological Society (LAMAS) promotes London's archaeology, local history, and historic buildings. The LAMAS Historic Buildings and Conservation Committee reviews planning applications relating to important historic buildings and seeks to ensure a sustainable future for vital aspects of London's built heritage.

The Committee has reviewed and discussed the application documents and wishes to make the following comments so as to explain its conclusion that planning permission should be **refused**.

We endorse wholeheartedly the comments made by Historic England (HE) in its letter dated 27th July 2021 regarding the heritage impact of the proposed development. 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.

We 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. 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.

The Committee also has concerns regarding the environmental sustainability of the proposed development. On page 26 of the Design and Access Statement it is stated that one of the project aspirations is to 'Embed Circular Economy principles within the overall design approach, including retention of as much existing structure as possible, and reusing materials wherever feasible'. This stands in marked contrast to the suite of demolition

drawings, which show the entirety of the River Court building will be razed and replaced. Aspiration and (proposed) reality are poles apart.

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. We 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?

In conclusion, 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. 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.

Vicki Fox (Hon. Secretary)

LAMAS – Historic Buildings & Conservation Committee

11 August 2021

13th August 2021

Kurt Gagen
Case Officer
By Email:
kurt.gagen@cityoflondon.gov.uk

Dear Kurt Gagen,

REPRESENTATION ON 120 FLEET STREET (APPLICATION REF. 21/00538/FULEIA):

DEMOLITION OF EXISTING RIVER COURT AND THE ERECTION OF A NEW BUILDING COMPRISING TWO BASEMENT LEVELS AND GROUND PLUS 20 UPPER STOREYS (93.15m AOD) INCLUDING COMMERCIAL, OFFICE & SERVICE USE, CREATION OF NEW PEDESTRIAN ROUTES AND CHANGE OF USE & REFURBISHMENT OF GRADE II* DAILY EXPRESS BUILDING FROM OFFICE TO LEARNING AND NON-RESIDENTIAL INSTITUTIONS (TOTAL DEVELOPMENT COMPRISING 61,135sq.m GIA)

We write on behalf of our client, Landsec, in respect of the above planning application. Landsec is the owner and portfolio holder of the New Street Square estate, comprising a total of 955,000sqft NIA.

A plan of the indicative extent of Landsec's surrounding assets with the proposed scheme in context is shown at **Appendix 1**.

In summary, our client is very supportive of the submitted proposals, which we consider will provide valuable regeneration benefits to the area of Fleet Street, the wider City of London and beyond.

The proposed development will seek to bring people back into the City of London following Covid-19, offering a range of veritable social, cultural and commercial uses in a heritage setting, which will act as a regional attraction and will enliven the City of London. Our client's support is offered subject to the detailed points/ clarifications required as set out within this letter, including appropriate planning conditions and heads of terms where relevant, having regard to the following themes:

- Land use;
- Height, scale & massing;
- Public realm;
- Wind & Microclimate;
- Construction impact;
- Transport & servicing;
- Vehicle routing;
- Cycle Hub; and
- Road Safety.

Further details are provided overleaf.

Land Use

The proposed land uses are welcomed and supported, including improved public access to the Daily Express Building.

It is considered that options for the use of the Express Building could be considered through consultation with local stakeholders, including the Fleet Street BID, with a marketing approach secured to maximise the opportunity and public benefits created by the refurbishment of the building. We assume that this is to be secured through the S106 agreement.

With regards to retail, Landsec strongly supports the approach to activate almost all of the frontages around the building.

It is noted that the proposals allow for power points and services to allow for the provision of a market in the future. Given the fragility of the retail sector at present, there is a need to consolidate retail uses and therefore any proposal for a market should be fully consulted on including its impact to existing retailers in and around the area, along with consultation with the Fleet Street BID.

Height, Scale & Massing

The proposed height, scale and massing is supported. Given the site's context, we consider the site is suitable for a tall building and is also a sensitive response to the local context. As such, it complies with London Plan Policy D9, 'Tall Buildings' along with adopted City of London Policy CS14 and Draft Strategic Policy S12.

Public Realm

It is noted from the proposals that the City of London has wider ambitions to remove the taxi rank from St Bride Street and pedestrianise this street and some of the surrounding area, as well as re-grade the public realm.

It is recognised that this potential future City public realm project is in its early stages of development, with details of proposals yet to be confirmed and agreed with stakeholders. Accordingly, Landsec and its tenants would want to be engaged early to ensure that its needs and requirements are factored in. It is considered that the removal of the taxi rank is likely to be a sensitive issue and as such, equivalent alternative locations need to be found in the immediate vicinity of the site, should the relocation of the taxi rank be supported by stakeholders.

It is worth noting that the lack of sufficient taxi rank facilities at New Street Square is an issue with existing office occupiers and therefore it is essential that replacement facilities are provided, so as not to dissuade office occupiers from taking space in the area.

Any re-grading of highways should be carefully considered, having regard to existing accessibility requirements and in consultation with local stakeholders. In this regard, it is noted that the City of London has adopted a Community Infrastructure Levy Neighbourhood Fund (CILNF) and

accordingly, an appropriate and proportionate level of contributions should be available proactively for the Fleet Street BID.

Wind & Microclimate

It is noted that the proposals have undergone wind tunnel testing and that the Council's guidance states that post-determination this should be reviewed. This approach is supported, along with mechanisms outside of the red line to allow for further mitigation as may be required, to ensure there is no future impact to surrounding streets including Landsec's portfolio, particularly as the thermal comfort/ wind impact is likely to be most significant at the junction of Little New Street and Shoe Lane.

We would assume that any such mechanisms in either conditions or obligations would relate to the original wind speeds and comfort levels in the original reports/ Environmental Impact Assessment, in order to be enforceable.

Construction Impact

It is noted from the planning documents that during construction, all vehicle access will be from St Bride Street, via Shoe Lane and the A40 to the north, which will involve the temporary closure of St Bride Street to pedestrians.

It is noted that this is likely to be the most sensible option to allow for the speediest construction process, and we welcome engagement on this to allow for disruption to be minimised as far as possible, including seeking to keep the closure to the shortest time possible. In this regard, in the event that the development stalls, pauses or is delayed, we would suggest that a temporary access is provided for pedestrians (as is a requirement for Landsec's 21 Moorfields development).

During construction, it is considered that the temporary relocation cycle hire station should be close to the existing site, for convenience of existing tenants and occupiers of the New Street Square area.

It is unclear how many deliveries would be made and the type of vehicles that would need to access the site during the construction period. It would be useful if this is clarified.

The use of Holborn Circus and Shoe Lane for vehicular construction access (N.B. as is proposed) is considered to be the most sensible option given that there are already a number of servicing vehicles accessing the New Street Square development from Fetter Lane, through to Pemberton Row and Printer Street.

We consider that it would be useful for the applicant to engage with Local Stakeholders prior to the submission of any Construction Logistics Management Plan to make sure it is robust as possible and minimises disruption, with a commitment to the use of this key route.

Transport & Servicing

The proposed loading bay and vehicle access is proposed to be provided via Shoe Lane, opposite the Peterborough Court development, comprising two lorry lifts (one for access and one for egress), with a Dock master managing access. On the basis that unloading/loading takes around 20 minutes per vehicle, it is noted that one bay could accommodate three vehicles per hour.

We support this approach noting there will be minimal disruption and no servicing on street. We note that 10% of vehicular servicing movements will not be consolidated and consider that this seems reasonable, based on the mix of uses proposed.

It would be useful to understand if it is the City of London's intention to restrict deliveries from Holborn Circus to Shoe Lane only as part of the operational development, noting that this has been committed to in the submitted application.

Vehicle routing

As set out in the Design and Access Statement and Transport Statement, it is noted that a comprehensive preventative maintenance contract will be in place covering all lifts and escalators, which typically provide for monthly maintenance visits supported by 24/7 callout cover.

We assume that this will be covered within the S106 to ensure that appropriate servicing arrangements and associated monitoring remain in place for the lifetime of the development so that there is no on-street disruption.

Cycle Hub

The provision of the Cycle Hub is strongly supported. In the event that occupation/ take up is not as strong as expected, it may be useful to allow for the space to be accessible to other local tenants and occupiers as appropriate, which could be something which is managed through the Fleet Street BID.

Road Safety

The proposals will optimise and intensify the use of the site and as a result, there will be significantly more pedestrian, cycle and vehicular movements as a whole (particularly with the provision of the Cycle Hub).

It is noted from Landsec's experience there are often conflicts between pedestrians, vehicles and cycles in the local area.

Therefore, Landsec welcomes the proposals to restrict daytime deliveries to non-peak times during the day but nonetheless is concerned over how enforceable the restricted times will be and that there may be an adverse impact on road safety in Shoe Lane, due to intensification of use. We note that the City of London monitors accident data and if there is compelling evidence to justify changes to delivery times or the layout of carriageway(s) in due course, this should be prioritised subject to engagement with surrounding stakeholders.



We hope these representations are useful. Please note, we are speaking with CO-RE directly in respect of the development and may update our representations accordingly, further to these discussions.

If you require any further information and would like to discuss this further, please do not hesitate to contact either Laura Jenkinson ([REDACTED]) or Ellen Moore ([REDACTED]) at these offices.

Yours sincerely

A handwritten signature in cursive script that reads 'Laura Jenkinson'.

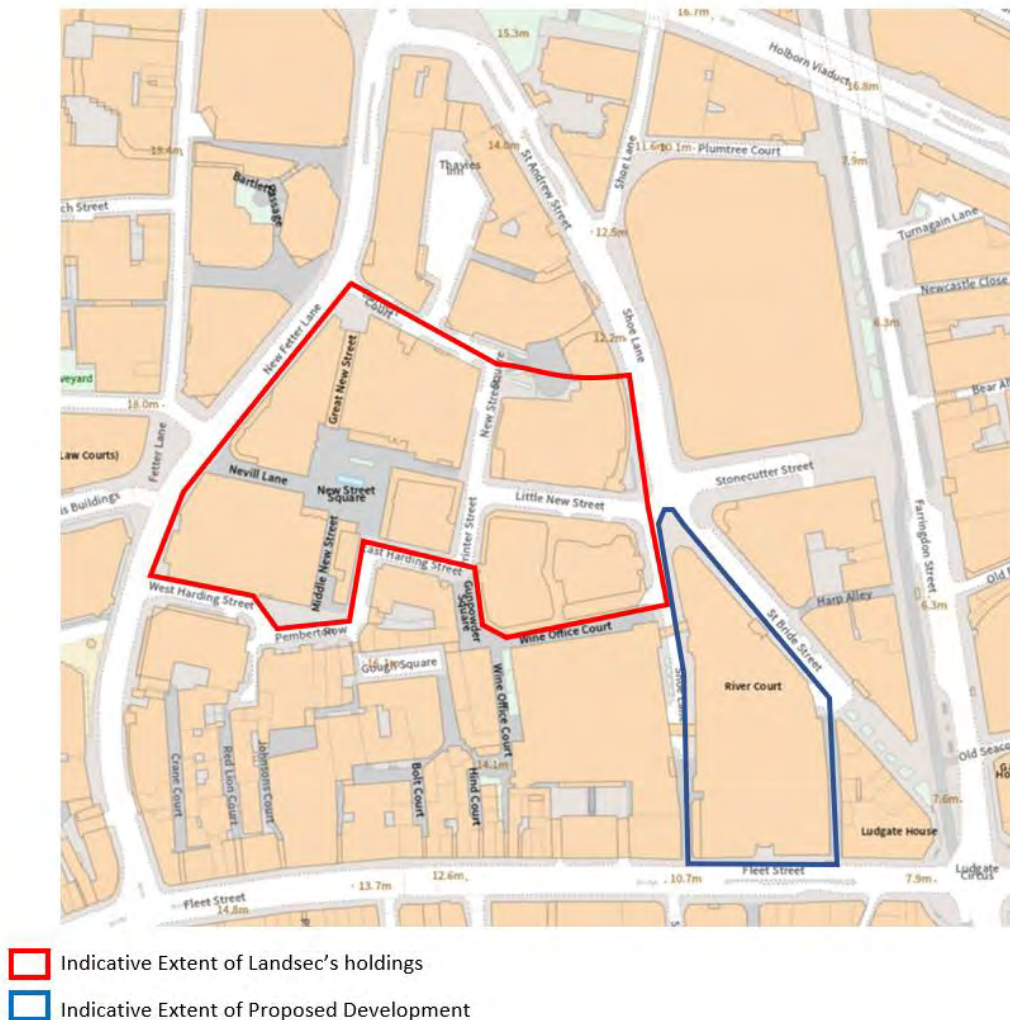
Laura Jenkinson
Director

[REDACTED]

[REDACTED]

For and on behalf of Avison Young (UK) Limited

Appendix 1 - Landsec's Land ownership within the context of the Site



Flat C & Flat D
Sovereign House
5 Poppins Court
London EC4A 4AX

14 August 2021

Mr K Gagen
Development Division
Department of the Built Environment City of London

By email to PLNComments@cityoflondon.gov.uk

Dear Mr Gagen

Location: 120 Fleet Street London EC4A 2BE (the “Proposal”)

Your ref: 21/00538/FULEIA

Thank you for your letter dated 22 July 2021.

Objection

I appreciate this a “David and Goliath” situation. The 252 documents for this planning permission application demonstrates the depth of resources and intent of the applicant. I have already raised these concerns set out below, with the applicant, but as they have not been addressed, all I can do is raise them again.

I **object** to the Proposal which I believe impacts 5 Poppins Court unacceptably (1) during the works for the Proposal; and (2) permanently once 120 Fleet Street is finished and in use. My various reasons are set out below.

Context

I have been a resident in the City of London for over 20 years and 5 Poppins Court is my family’s home. One of the special things about living in the vicinity of Fleet Street, is the historic significance of the area. It is difficult to imagine a 21 floor building fitting into this ceremonial street.

This year we have already suffered considerable disturbances from preliminary works in the current 120 Fleet Street building. Only once many of us had complained vociferously was anything done to mitigate the overwhelming noise and disturbance.

The redevelopment for the Proposal

Noise and vibration

I note that the Environmental Statement 11.8 states “All stages in the refurbishment, demolition and construction program are predicted to result in a **Major Adverse** effect (significant) at 5 & 6 Poppins Court.”

I am very concerned about the extreme and constant noise from the demolition and the building works for the Proposal. The vibrations expected from the works are also a real worry. 5 Sovereign House is a small old building and the preliminary works have already made the building vibrate.

It is important to note that the residents of 5 Sovereign House are very varied and range from school children to retirees and everything in between. Some people work from home, some are at home all day and some work shifts. For some, 5 Sovereign House is a buy to let investment and for others, quite simply, 5 Sovereign House is home. Therefore, at all times of the day or night, the noise and disturbance will have an impact on some of us in 5 Sovereign House and in particular on our well-being and our sleep.

Air quality

Air quality is referred to in the Environmental Statement Volume 3, Annex 1 Health Impact Assessment which notes the deconstruction and construction site of the Proposal are “considered to be high-risk”. I welcome a stringent Dust Management Plan. Asthma and respiratory problems will be exacerbated by additional dust, which is of particular concern for my family. During the summer months, not being able to open the windows because of the dust, will be intolerable.

Ability to rent out or sell property at 5 Poppins Court

If we wanted to escape the disruption for the duration of the works of this Proposal our ability to sell or rent out our flats, will be seriously inhibited.

Once 120 Fleet Street completed

Loss of light

Permanent issues for 5 Poppins Court, caused by the Proposal, are numerous and varied, however, loss of light and overshadowing is of particular concern.

Some flats in 5 Poppins Court, including mine, see 100% reduction in annual probable sunlight hours (“APSH”) during the winter months (ES Volume 3, Appendix 3, Part 9). This is characterised as “acceptable” in 11.22-11.24 in the Environmental Statement Chapter 11, if I understand it correctly, on the basis that the reduction is from one (1) hour to zero (0) hours of winter APSH once 120 Fleet Street is completed. I assume that this is as result of the Proposal being over 93 metres high. This is entirely unacceptable.

To be left with zero (0) APSH over the winter permanently, so 120 Fleet Street can roughly double in height from the current building, will affect the well-being of my family hugely. It will not surprise anyone, given the space constraints in properties generally in the City of London, that the master bedroom in question has in fact many purposes and is also used as a playroom and is where homework is undertaken.

Should we ever wish to move, the worsened position for daylight and sunlight in the master bedroom will of course impact our ability to do so.

Noise and disruption from 120 Fleet Street

Increased noise in Poppins Court due to more retail units being serviced, antisocial behaviour if pubs/bars/clubs are part of the intended use of the retail space and an increase in litter due to higher footfall are permanent issues which will all need to be mitigated and addressed. I would object very strongly to the external areas of 120 Fleet Street, such as

roof terraces and pavement level spaces, being used for pubs or bars. A permanent security and cleaning programme would go a long way to ensuring that Poppins Court and the surrounding areas are maintained to acceptable standards.

As an aside, I welcome any additional green space, which is publicly available. The constant use of the seating area at the end of St Bride's Street demonstrates the need for pleasant public green spaces. However, the amount of additional green space suggested feels disproportionately small given the overall size of the Proposal. Could the applicant not do more? In any event, this in no way makes up for the permanent and negative impact the Proposal has on 5 Poppins Court.

Thank you for putting my objection before the Planning Committee.

Yours sincerely

Susannah Bond

Flat K Poppins Court Sovereign House London EC4A4AX

Mr K Gagen
Development Division
Department of the Built Environment
City of London

By email to PLNComments@cityoflondon.gov.uk

Wednesday 18th August 2021

Dear Mr Gagen,

OBJECTIONS

Re: 120 Fleet Street and Dally Express building EC4A 2BE
Your ref: 21/00538/FULEIA

We refer to your notice of 14 July 2021. We are residents of Sovereign House at 5 Poppins Court. We have occupied Flat K for over 20 years and use it for domestic and work purposes. It is vital to us to have undisturbed occupancy and this will be threatened very seriously if this development goes ahead over the planned period.

While we recognise that there are certain benefits to the area in a development of this building and the regeneration that might accompany it, we believe that there are significant aspects of the plan which will have an adverse impact on the environment, local residents and neighbouring businesses.

In particular, we request that there be taken into account the following points:

1. We **object** to the height of the proposed new building. Even with its stepped design, a building of 21 floors will dominate the surrounding area in this setting and be detrimental to the visual appearance of the area, particularly to St Brides Street.
2. We **object** further in that the proposed development will adversely affect the amenities of occupiers of residential properties in the vicinity through loss of light, sunlight and overshadowing because of its close proximity to Poppins Court:
 - a. Poppins Court itself will be narrowed, especially from the second to fifth floors of the proposed building.
 - b. The existing building at 120 Fleet Street (the "GS building") is 4 storeys at the Poppins Court elevation and the proposed building would increase this to six, plus a further 7 floors slightly tapering away.
 - c. The resulting loss of daylight, sunlight and overshadowing that will occur is acknowledged in the application as having a major impact (chapter 11 para. 11.13 of the ES). This will be permanent. We **object** to this. That is a very serious threat to the enjoyment and indeed value of the flats in the building. Several of the Sovereign House apartments have windows onto that elevation. Amendments to the scheme should be included to address this issue.
3. The proposed scheme will have a significant and continuing impact on local residents and businesses during the very long period of refurbishment, demolition and construction (see

- para 11.8 of the ES). No mitigation of this very serious disruption is proposed. We believe the noise and disturbance will be intolerable for residents many of whom live and work in the building, unless there is a carefully explained, monitored and regulated format to reduce and mitigate the noise dust etc. We also believe that certain basic amendments should be made to Sovereign House, which is an old building poorly equipped to deal with such a convulsive and proximate building scheme. For example, double glazing and air conditioning would go some way to mitigate noise and dust pollution.
4. While we welcome public access to the listed building, we question the proposed uses of the space; are exhibition and event spaces really viable in this predominantly commercial area of London where activity reduces substantially after business hours?
 5. Conditions should be imposed on the permitted uses of the non-commercial elements to protect the amenity of local residents. Potential uses in particular that we **object** to are:
 - a. Restaurant, café or drinking establishments should not be permitted above ground floor (for example on the roof-top green spaces)
 - b. Roof-top green spaces are planned but should not be used outside office hours for events
 - c. The inevitable increase in food retail will bring litter to Poppins Court. The scheme should incorporate a regular cleaning programme to address this.
 6. We support in principle the proposal to restore the Daily Express building. The conservation of this grade ii* heritage asset must be given great weight in the scheme and if approved it should be undertaken prior to the new building being occupied.
 7. We support the principle of urban greening but feel that 1,950sqm out of 50,550sqm is an insignificant percentage in the scheme of things.
 8. Our other fundamental concern and **objection** to the entire scheme is that our property will be impossible to rent let alone sell during the long period of works and we believe flat owners should be compensated for this block on the commercial value on their properties which many residents have bought for their investment value as well as to live and work in. Why should we all lose out financially for a long period because of this development?

Please acknowledge receipt of this letter.

Yours sincerely,



Christopher and Alison Edwards

Flat H Poppins Court Sovereign House London EC4A4AX

Mr K Gagen
Development Division
Department of the Built Environment
City of London

By email to PLNComments@cityoflondon.gov.uk

18th August 2021

Dear Mr Gagen,

OBJECTIONS

Re: 120 Fleet Street and Daily Express building EC4A 2BE
Your ref: 21/00538/FULEIA

Thank you for your notice of 14 July 2021. We are residents of Sovereign House at 5 Poppins Court. The family has occupied Flat H for over 20 years and use it for domestic and work purposes. We are very concerned that our quiet enjoyment of the premises will be threatened very seriously if this development goes ahead without at least some very strong checks and balances.

We believe that there are significant aspects of the plan which will have an adverse impact on the environment, local residents and neighbouring businesses.

In particular, we request that there be taken into account the following points:

1. We **object** to the height of the proposed new building. Even with its stepped design, a building of 21 floors will dominate the surrounding area in this setting and be detrimental to the visual appearance of the area, particularly to St Brides Street.
2. We **object** that the proposed development will adversely affect the amenities of occupiers of residential properties in the vicinity through loss of light, sunlight and overshadowing because of its close proximity to Poppins Court: our flat H which looks down over Poppins Court will be very badly affected.
 - a. Poppins Court itself will be narrowed, especially from the second to fifth floors of the proposed building.
 - b. The existing building at 120 Fleet Street (the "GS building") is 4 storeys at the Poppins Court elevation and the proposed building would increase this to six, plus a further 7 floors slightly tapering away.
 - c. The resulting loss of daylight, sunlight and overshadowing that will occur is acknowledged in the application as having a major impact (chapter 11 para. 11.13 of the ES). This will be permanent. That is a very serious threat to the enjoyment and indeed value of the flats in the building. Several of the Sovereign House apartments have windows onto that elevation. Amendments to the scheme should be included to address this objection.
3. The proposed scheme will have a significant and continuing impact on local residents and businesses during the refurbishment, demolition and construction (see para 11.8 of the ES).

No mitigation of this very serious disruption is proposed as far as we can see. We believe the noise, dust and disturbance will be intolerable for residents, many of whom live and work in the building and some of whom have children. Sovereign House is an old building poorly equipped to deal with such a building scheme. It might help if double glazing and air conditioning were installed to mitigate noise and dust pollution.

4. Conditions should be imposed on the permitted uses of the non-commercial elements to protect the amenity of local residents. Potential uses in particular that we **object** to are:
 - a. Restaurant, café or drinking establishments should not be permitted above ground floor (for example on the roof-top green spaces)
 - b. Roof-top green spaces are planned but should not be used outside office hours for events
 - c. The inevitable increase in food retail will bring litter to Poppins Court. The scheme should incorporate a regular cleaning programme to address this.
5. We support in principle the proposal to restore the Daily Express building. The conservation of this grade ii* heritage asset must be given great weight in the scheme and if approved it should be undertaken prior to the new building being occupied.
6. We support the principle of urban greening but feel that 1,950sqm out of 50,550sqm is an insignificant percentage.
7. Our other fundamental concern is that our properties will be impossible to rent or sell during the long period of works and we believe flat owners should be compensated for this block on the commercial potential on their properties which many residents have bought for their investment value.

Please acknowledge receipt of this letter.

Yours sincerely,

A large black rectangular box redacting the signature of Ludovica Attanasio.

Ludovica Attanasio

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Fwd: 120 Fleet Street development
Date: 19 August 2021 12:22:11

THIS IS AN EXTERNAL EMAIL

Fao Mr gagan

Further to my previous email mail I do need to flag with you again the impact this scheme will have on the quality of life for residents of Poppins Court.

The demolition on stonecutter Street has commenced today. Not only did work commence before 9am but the impact of that work is actually making sovereign House physically shake even at this early stage.

I would urge you to come and look at that first hand before the decision is made on 120 Fleet Street. If that work is making our building shake ,heaven help us when 120 Fleet Street commences, our properties will be barely habitable and it will certainly not be possible to work from home!

This is a formal note of concern for lodging with my previous correspondence.

Thank you
Tom street
Flat M
Sovereign house
Poppins Court
Lobdon

GREATER **LONDON** AUTHORITY

Good Growth

Mr Kurt Gagen
City of London Corporation

Our ref: GLA/2021/0784/01
Your ref: 21/00538/FULEIA
Date: 23 August 2021

Via Email

Kurt.gagen@cityoflondon.gov.uk

Dear Mr Gagen,

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
120 Fleet Street, London
Local Planning Authority reference: 21/00538/FULEIA

I refer to the copy of the above planning application, which was received from you on 14 July 2021. On 23 August 2021 Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills, acting under delegated authority considered a report on this proposal, reference GLA/2021/0784/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not fully comply with the London Plan 2021 for the reasons set out in paragraph 91 of the above-mentioned report.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Jack Kinder, e-mail jackkinder@tfl.gov.uk.

Yours sincerely



John Finlayson

Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
Danny Calver, TfL
Agent: Mr Mike Moon - DP9 email: mike.moon@dp9.co.uk

The Daily Express Building, 120 Fleet Street

in the City of London

local planning authority reference 21/00538/FULEIA

Strategic planning application stage 1 referral

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

The proposal

The applicant is proposing a comprehensive redevelopment of the site including the annexing of the Daily Express building and the complete demolition of the River Court building. Specifically, the works include the construction of a new 21 storey office-led building providing office floor space on the upper levels with retail, office lobby, cycle house, service area and new pedestrian links at ground level. The works also include the restoration and re-use of the Daily Express building for publicly accessible cultural and leisure uses.

The applicant

The applicant is **River Court Properties Limited** and the architect is **Bjarke Ingels Group**.

Strategic issues summary

Land Use Principle: The development's contribution to the wider strategic functions of the CAZ, with the delivery of new high quality office floorspace (including affordable and retail floorspace), new cultural floorspace and enhanced public realm accords with the London Plan (paragraph 16 to 24).

Urban Design, Heritage and Views: In terms of design, 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 and permeability throughout and around the site. The proposal will not result in harm to the significance of heritage assets or impact upon locally important or strategic views (paragraph 25 to 51).

Transport: The car free development is welcome. However, concern is raised with the relocation of bus stops during construction. Additional details on pedestrian comfort levels, wayfinding and compliance with LCDS cycle requirements are also required. A contribution towards the upgrade of the Cycle Hire Docking Station on St Bride Street is requested. Delivery and Servicing, Pedestrian Routing Management and CLP Plans should also be secured (paragraph 52 to 75).

Sustainability and Environment: Additional clarification is required with regards to energy commitments and requirements. Overall, and subject to securing appropriate conditions, the proposal is not likely to raise any noteworthy environmental concerns (paragraph 76 to 87).

Recommendation

That the City of London Corporation be advised that the application does not yet fully comply with the Mayor's London Plan, for the reasons set out in paragraph 91 of this report; but that the possible remedies set out in that paragraph could address these deficiencies.

Context

1. On 14 July 2021, the Mayor of London received documents from the City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Corporation with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The proposed scheme would be referable to the Mayor under the following Category of the Schedule to the Order 2008:
 - *Category 3E(xi): Development which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and comprises or includes the provision of more than 2,500 square metres of non-residential floorspace.*
3. Once the City of London Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal or allow the Council to determine it itself.
4. The Mayor of London's statement on this case will be made available on the GLA's website: www.london.gov.uk.

Site description

5. The site is within London's Central Activities Zone and within London's Square Mile and is boundary by Fleet Street to the south, Shoe Lane to the west, St Bride's to the north east and Poppin's Close to the east. An existing 11 storey office building known as the River Court building is located on the site. The Grade II* Listed Daily Express also forms part of the development site. The River Court building was constructed in 1998 and is conjoined with the Daily Express building. In terms of heritage, as outlined above, the site includes a Grade II* Listed Building known as the Daily Express Building. This 'Art Deco' building was completed in 1932 and is of reinforced concrete construction with black glass facing with metal casements. The part of the site that is occupied by the Daily Express Building is also located within the Fleet Street Conservation Area. Further, the site is surrounded by many national and internationally significant heritage buildings including the Grade I Cathedral Church of St Pauls to the east. In addition to heritage, the site is within the wider setting consultation area for London View Management Framework (LVMF) view 5A.2 from Greenwich towards St Paul's Cathedral.
6. The site has a PTAL rating of 6b on a scale of 0 (poor) to 6b (excellent). The development fronts the Strategic Road Network (SRN) on Fleet Street to the south, Shoe Lane to the west, St Bride's to the north east and Poppin's Close to the east. The nearest Transport for London Road Network (TLRN) is located east on A201 Farringdon Street where TfL is the highway authority. The closest London Underground (LU) station is located 390 metres south east at Blackfriars Underground providing access to Circle, District line and wider range of LU,

London Overground, National Rail. Chancery Lane, Covent Garden and Leicester Square LU stations are located east and within walking distance of the site. Thameslink, London Overground services can be accessed via City Thameslink Station 90 metres east of the site. There are 14 bus services within walking distance of the site and directly outside the site on Fleet Street Ludgate Circus stop E.

7. Cycleway 6 (C6) is located on A201 Farringdon Street, C6 provides connections from Kentish Town to Elephant and Castle. Full Segregated Cycle route CS3 is located 345 metres south along A3211 Victoria Embankment. This provides connections from Barking to Lancaster Gate. The nearest Cycle Hire docking station is located east on St Bride's Street with 25 docking stations.

Details of this proposal

8. The proposal involves the demolition of the existing River Court building at 120 Fleet Street, including part demolition of the basement. Construction of a new building arranged over two basement levels, ground floor and 20 upper storeys comprising commercial, business and service use (Class E).
9. In addition, the proposal also includes alterations to and refurbishment of the existing Grade II* listed Daily Express Building at 120 Fleet Street, including works to physically detach the building from the River Court building with demolition of part of linking floorplate and structure from basement level 01 to level 06, and associated erection of new north façade in materials to match existing, with integrated louvres above ground level. Retention of south-east curved corner and part demolition of existing east façade from ground level to level 5 and erection of new façade with materials to match existing, including new shopfront with high-level integrated louvres. Part modification of existing main entrance doors and steps at ground level on south elevation to provide ramped entrance. Alterations to the western façade including in association with a new shopfront proposed at ground level and the installation of ventilation louvres at level 5. Demolition of existing roof and erection of new roof with associated roof garden. Demolition of level 6 landing and extension of existing oval staircase from level 6 to provide extended staircase to new roof with new core on north side incorporating new lift between roof level and basement level 01 and new staircase between roof level and basement level 2. Demolition of modern mezzanine structure at basement level 1. Removal of some modern partitions and finishes on all floors with other associated alterations.
10. All works to the Daily Express Building to be carried out in connection with a change of use to learning and non-residential institutions use (Class F1), retail purposes within use Class E (a),(b),(c), flexible learning and non-residential institutions use / commercial business and service use (Classes F1/E), flexible learning and non-residential institutions use / retail purposes / bar (Classes F1/E(a),(b),(c)/Sui Generis), and the provision of public terraces (Sui Generis). Public realm and highway works, including creation of new pedestrian routes through the site at ground floor level, access and servicing arrangements including loading bay entrance from Shoe Lane and cycle house entrance from St Bride Street, and hard and soft landscaping works. The provision of bicycle and vehicle parking, mechanical building plant, and other associated and ancillary works incidental to the development.'

11. The proposed development would result in buildings with a GEA floorspace of 77,391sqm.

Case history

12. On 3 March 2021, a pre-application meeting was held between the applicant and GLA officers to discuss a proposal for the comprehensive redevelopment of the site including the annexing of the Daily Express building and the complete demolition of the River Court building. The works also included the construction of a new 21 storey (93.15 metres) office-led building providing up to 48,659sqm of office floor space on the upper levels with retail, office lobby, cycle house, service area and new pedestrian links at ground level. Further, the works included the restoration and re-use of the Daily Express building for publicly accessible cultural and leisure uses. The pre-application note confirmed that the land use principle of the proposal was considered acceptable in strategic planning terms. With respect to design, the note indicated that the submitted visuals suggest that the architecture and new public realm would respond well to the distinctive heritage of the Daily Express building, with a simple and refined appearance. In terms of heritage and views, a town, heritage and visual impact assessment would be required to demonstrating compliance with relevant policy on heritage and strategic views.

Strategic planning issues and relevant policies and guidance

13. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the City of London Local Plan 2015 and the London Plan which was published and became part of the statutory development plan on 2nd March 2021.
14. The following are relevant material considerations:
- The National Planning Policy Framework and National Planning Practice Guidance;
 - Central Activities Zone Supplementary Planning Guidelines (March 2016); and
15. The relevant strategic issues and corresponding policies are as follows:
- Good Growth *London Plan;*
 - Opportunity Area *London Plan;*
 - Employment *London Plan;*
 - Urban design *London Plan; Character and Context SPG; Housing SPG; Play and Informal Recreation SPG;*
 - Strategic views *London Plan, London View Management Framework SPG;*
 - Heritage *London Plan; World Heritage Sites SPG;*
 - Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
 - Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;*
 - Transport and parking *London Plan; the Mayor's Transport Strategy;*

Land Use Principles

16. The site is located within the Central Activities Zone (CAZ) and the proposed uses, being office, retail and cultural floorspace, accord with the objectives of the CAZ. In particular, Policy SD4 (Central Activities Zone) of the London Plan encourages development within the CAZ that supports its internationally significant office function.

Employment floorspace

17. With regards to employment floor space, policies E1, E2 and E3 all seek to ensure the development and enhancement of employment floor space including the provision of affordable or low-cost workspace.
18. The development itself would provide in excess of 61,000 sqm of floorspace of employment (offices) use. The quantum of this employment floorspace in this location would support the strategic function of the CAZ and London's world city role in accordance with Policies SD4 and E1 of the London Plan 2021.
19. Policy E3 of the London Plan promotes affordable workspace in new developments, in certain situations. In this instance, the site is not located in such an area and consequently no element of affordable workspace is proposed.

Cultural and social floorspace

20. Policies HC5 and SD4 of the London Plan aim to support the continued success of London's cultural assets and encourages the enhancement of and expansion of such floor space. Although the site is not located in a specific cultural quarter of the CAZ, the use of the Daily Express building for culturally based floorspace would be strongly encouraged as it would help to enhance and expand London's cultural assets in line with the objectives of Policies HC5 and SD4 (The Central Activities Zone) of the London Plan.
21. The Daily Express Building will have a change of use to provide 5,269sqm (GIA) of floorspace consisting of new flexible leaning and non-residential institutions with some associated commercial, business, service and retail floorspace. The uses would fall within Use class F, E and Sui Generis. It is noted that the proposed cultural uses are indicative and subject to refinement as viable cultural operator / partnership opportunities develop. The indicative layout is the creation of a circa 200 seat event and exhibition space within the basement level, a rotating exhibition space within the lobby area, flexible uses (cultural or complementary to) on levels up to level four, a café/bar space with creative based retail floorspace on the fourth floor, an exhibition space on the sixth floor and a publicly accessible roof space that will be used for public events.
22. Cultural uses will be defined within a Cultural Implementation Strategy to be agreed with the Local Planning Authority and secured by S106 Agreement. Given this, the applicant considers it necessary to apply for a flexible range of planning use classes for some of the proposed cultural spaces within the Daily Express Building.

23. Policy S1 of the London Plan seeks to ensure that social infrastructure that addresses a strategic need and supports service delivery strategies should be supported, particularly in places with good accessibility to public transport and cycle and walking infrastructure. In terms of location, the site is located within an area that has excellent access to public transport and also direct frontage to London's cycle infrastructure network.

Land use principle conclusion

24. Overall, the principle of the redevelopment of the site for improved office, retail and cultural floorspace is considered acceptable in principle as it would accord with the objectives of the Mayor's policies concerning cultural and employment provision in the CAZ.

Urban design

25. The design principles of chapter three in the London Plan outline that all developments should achieve a high standard of design which responds to local character, enhances the public realm and provides architecture of the highest quality. Previous urban design comments received at pre-application have helped to inform and refine the design approach of the current scheme which is welcomed.

Architecture

26. When assessed against the design principles of chapter three of the London Plan, GLA officers are of the opinion the architecture with a modern Art Deco approach is strong and responds well to the character of the Daily Express building without detracting from its own significance. The approach to façade design and materials is supported and it is expected that the new building will sit comfortably with the setting of nearby heritage assets (Daily Express Building and Fleet Street Conservation Area) and also enhances the local streetscape. Notwithstanding this, the bespoke design will require high attention to detailing and expert use of materials. Any planning consent issued should include conditions to ensure exemplary design quality is delivered.

Scale, mass and tall buildings

27. As outlined at pre-application stage, the design-led approach to the massing is strongly supported and responds well to the contrasting character of Fleet Street and taller buildings to the north. Overall, GLA officers are of the view that the form and massing configuration responds positively to the scale of nearby buildings and would respect the setting of the listed Daily Express building.
28. Policy D9 of the London Plan relates to tall buildings and Part B of this policy states that such buildings should only be developed in locations identified as suitable in development plans. In terms of the acceptability of a tall building, the portion of the site where the new building will stand is located within the City of London where Policy CS14 of the City of London Corporation Local Plan 2015 identifies as being suitable for tall buildings. Based on this, the proposed tall building is in accordance with Part B of Policy D9 of the London Plan.

29. Notwithstanding the above assessment, all tall buildings are subject to the criteria set out in Part C of Policy D9, relating to visual, environmental, functional and cumulative impacts. In this regard, GLA officers are of the view that through the provision of relevant technical reports (including planning statement, design and assess statements, heritage, townscape and view assessments, transport assessments, micro-climate assessment, noise assessments and daylight and sunlight assessments) it has been demonstrated that all the criteria within this policy have been successfully addressed. Specific details on the developments impact upon heritage assets and strategic views have been discussed below.

Public realm

30. The introduction of new public routes with high quality landscaping and logical layout will significantly improve local connectivity through the site. Details submitted as part of the submission illustrate that the sizing and spatial quality of these new routes are likely to result in a functional new area of public realm that has been designed to accommodate expected number of pedestrians and also allows safe and convenient access for cyclists. Further, the new areas of public realm will also allow the listed Daily Express building to standalone as originally intended and is strongly supported as it is likely to enhance the setting of the listed building which is currently compromised by the existing River Court building. Overall, GLA officers are of the view that the proposed new public realm has been well designed to create a new vibrant environment for all visitors to the site and as such meets with the objectives of Policy D8 of the London Plan.

Heritage and views

31. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to listed buildings, all planning decisions 'should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses' and in relation to conservation areas, special attention must be paid to 'the desirability of preserving or enhancing the character or appearance of that area'. If it is judged that harm to the heritage asset/s would arise from the proposed development, considerable importance and weight must be attributed to that harm in order to comply with the statutory duties.
32. The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should be given to the asset's conservation and, the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset's physical presence or its setting. Where a proposed development will lead to 'substantial harm' to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to 'less than substantial harm', the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

33. London Plan Policy HC1 states that development should conserve heritage assets and avoid harm, which also applies to non-designated heritage assets.
34. The site contains a Grade II* listed building and is partially located within the Fleet Street Conservation Area (FSCA). Further, the site is surrounded by many national and internationally significant heritage buildings. With regards to impact upon heritage, the site is located within close proximity to the Grade I listed St Paul's Cathedral to the east, the Grade I St Bride's Church (opposite the site), the Grade II 90-94 Fleet Street and The Old Bell Public House, the Grade II 9 Salisbury Court (opposite the site), the Grade II Mersey House and the Daily Telegraph Building. Given the presence of many heritage assets, a comprehensive heritage assessment (HA) and view assessment accompanied the planning application. The assessment is comprehensive and outlines the proposed development impacts on all heritage assets within 750 metres on the site in line with relevant policy including the NPPF and London Plan 2021 Policies HC1 and HC2.
35. The Daily Express building is a Grade II* listed building and occupies the south-western corner of the site fronting Fleet Street and which also sits within the FSCA. As outlined previously, the proposed works will annex this building from the remainder of the development site and include significant restoration works. In terms of use, the standalone building will be used for cultural and leisure purposes and will be publicly accessible. The submitted HA champions the proposed restoration works and change of use for cultural activities and concludes that the works will enhance both its setting within the conservation area and its significance as an important heritage asset. GLA officers agree with the conclusion of the HA and conclude that the restoration works will avoid harm to, and will conserve the heritage asset in accordance with the objectives of both the NPPF and Policy HC1 of the London Plan.
36. With regards to surrounding heritage assets, the HA identified the heritage significance of each asset within a 750 metre radius of the site including conservation areas. The assessment then considered the magnitude of impact upon these assets by determining how the proposal would change the heritage asset or its setting.
37. Part of the site is within the FSCA and the remainder is clearly visible from it. The HA notes that at present the Daily Express Building makes a positive contribution to the FSCA, however its concealed frontage has a negative impact. In terms of impact of the proposed works, GLA officers agree with the HA which concluded that during the construction period, the works would have a major effect, however once works are completed, both the refurbishment of the Daily Express Building together with the replacement of the existing River Court Building with a building of high architectural quality would result in an enhancement of the conservation area.
38. The design of the new building together with its separation would result in minimal changes to the setting of the Grade I listed St Paul's cathedral with the HA stating that the proposal would have a neutral effect. As outlined in detail below, when viewed from strategic viewpoints around the city, the proposed development will not result in harm to the setting of this important heritage asset. With regards to the other nearby heritage assets (as outlined above), the HA has

considered the impacts of the scheme on each item individually, and concluded that although the proposal would result in a noticeable physical change to setting of some of these items, overall the proposal would have either a neutral or beneficial effect on the setting of each item. With respect to impacts upon other heritage assets located within the wider area (750 metres of the site), the HA also concluded that the works would have either a neutral or beneficial effect. On balance GLA officers agree with the conclusions of the HA with regards to impacts on surrounding heritage assets.

39. Having taken into consideration the statutory duties in relation to listed buildings and conservation areas and the relevant NPPF and London Plan policies in relation to heritage assets, GLA officers are of the view that the proposal would provide an appropriate response to context and will enhance the setting of Grade II* Daily Express Building. With respect to impact upon surrounding heritage, although the new building is of greater mass and height, the high quality architecture results in a building that will have no detrimental impact upon both the setting of the closet heritage items and also on the character of the adjacent FSCA. On this basis, GLA officers are of the view that the proposal would not result in harm to surrounding heritage assets and as such the proposal accords with the objectives of Policy HC1 of the London Plan.
40. Notwithstanding the above conclusion, the proposed development will also deliver a number of public benefits which should also carry weight when undertaking a balancing exercise as required by paragraph 196 of the NPPF. These public benefits include:
 - The removal of the existing River Court building and the annexing of the Daily Express building will enhance its setting;
 - Improving the public realm and active street frontages to the listed building and around the Site;
 - The creation of a new publicly accessible cultural destination (including public roof garden);
 - Restoration of a listed building including the reinstatement of the original entrance and lobby resulting in and improved activation to the street that is likely to enhance the character of the conservation area.

Strategic (London View Management Framework – LVMF) views

41. The key objectives of Policies HC3 and HC4 of the London Plan is to preserve strategic views to and from important landmarks. Developments should therefore not be intrusive, unsightly or prominent to the detriment of the view nor should they harm the composition of the view as a whole or impact upon a landmarks silhouette. To achieve this, developments should not exceed threshold heights within viewing corridors, fit within the prevailing pattern of buildings and spaces, prevent a canyon effect and maintain the context of the landmark's surrounding environment.
42. The site falls within a number of LVMF views and as such a comprehensive Townscape Visual Impact Assessment (TVIA) formed part of the planning submission documents. This document assess the impact of the scheme on these strategic views against the objectives of Policy HC3 and HC4 of the London Plan.

43. The proposed development will be visible from a number of LVMF views to St Paul's Cathedral including LVMF 11A.1 (from London Bridge), LVMF 12A.1 (from Southwark Bridge), LVMF 13A.1 (from Millennium Bridge), LVMF 15B.2 (downstream from Waterloo Bridge), LVMF 16B.1 (from South Bank) and LVMF 17B.2 from Golden Jubilee and Hungerford Footbridges). The visual management guidance notes that St Paul's should remain dominant in these views. With respect to this, the proposed building is located away from St Paul's falling within a cluster of other commercial buildings that form part of the surrounding urban context. The proposal is of a scale similar to surrounding buildings and would therefore not be prominent, thereby allowing St Paul's to remain the principal landmark within these views.
44. The proposed building would also fall within the backdrop of LVMF 18B.1 view from Westminster Bridge towards the London Eye, County Hall and the Shell Centre. Although, the proposed building will rise higher than some of the other buildings that fall within the backdrop of this view, the building will fall in with the prevailing pattern of buildings and as such would not impact upon the dominants of the landmarks outlined above.
45. A portion of the proposed building falls within the Wider Setting Consultation Area of LVMF 5A.2 from Greenwich Park towards which provides an uninterrupted view corridor towards St Paul's. Central London, tower bridge and the Isle of Dogs (Canary Wharf) cluster are also visible from this point. In terms of impact, the proposed building would be visible, however will fall within an established cluster of buildings located to the west of St Paul's. Given the distant nature of the view, together with the existing backdrop, the proposed development is consistent with the objective of the view corridor which is to preserve the silhouette of St Paul's against the background of the view.
46. The site also falls just outside the Wider Setting Consultation Area of view 6A.1 from Blackheath. Developments should preserve or enhance the ability to recognise and appreciate St Paul's from this point. Given the distance of this view point, and the relative height of the proposal compared to other buildings within the view corridor, the proposed building would have a negligible impact upon the setting of St Paul's.
47. Although the site falls within a number of view corridors and is located immediately adjacent to others, the height and mass of the proposed building results in only a marginal change in views. The TVIA illustrate that the height and mass of the proposed building will not result in any harm to protected vistas, nor the viewers ability to recognise and appreciate a strategically important landmark. Further, the design of the proposal is such, that it is not considered to result in an intrusive, unsightly or prominent feature in a viewing corridor to a strategically important landmark. The proposal accords with the objectives of Policies HC3 and HC4 of the London Plan.

Inclusive access

48. Policy D3 of the London Plan 2021 seeks to ensure that proposals achieve the highest standards of accessible and inclusive design. Any application should ensure that the development can be entered and used safely, easily and with dignity by all; is convenient and welcoming with no disabling barriers, providing

independent access without additional undue effort, separation or special treatment; is designed to incorporate safe and dignified emergency evacuation for all building users. The proposed works include significant alterations to the public realm including the creation of new routes through the site. These changes, together with other proposed public realm improvements will enhance accessibility for all throughout and around the site. As such, the works are expected to accord with the requirements of Policy D3 of the London Plan.

Fire safety

49. Policy D12 of the London Plan states that major applications should be accompanied by a fire statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Further to the above, Policy D5 (B5) of the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users, with fire evacuation lifts suitable to be used to evacuate people who require level access from the buildings.
50. No Fire Safety Statement has been provided. To ensure that the scheme accords with Policy D5 of the London Plan, a Fire Safety Statement must be provided prior to determination and Council must confirm that appropriate Fire Safety considerations have been agreed and that compliance is secured by way of condition or legal agreement.

Transport

51. In terms of transport, the proposal has been assessed against the relevant transport policies within the London Plan. Particular regard has been made to Policy T1 (Strategic Approach to Transport), Policy T2 (Healthy Streets), Policy T3 (Transport Capacity, Connectivity and Safeguarding), Policy T4 (Assessing and Mitigating Transport Impacts), Policy T5 (Cycling), Policy T6 (Car Parking) and Policy T7 (Deliveries, Servicing and Construction).

Healthy streets transport assessment

52. Policy T2 of the London Plan 2021 requires that all developments proposed should support the Mayor's Healthy Streets approach. In response to this, the application was accompanied by a Transport Assessment (TA) which follows the Transport for London (TfL) Healthy Streets best practice template which is welcomed.
53. With regards to the Active Travel Zone (ATZ) assessment, the routes selected are considered appropriate. As demonstrated through Vision Zero analysis undertaken, killed or seriously injured (KSI) clusters can be identified on all key routes assessed as part of the ATZ assessment. It is therefore disappointing that the applicant does not commit to the delivery of any of the improvements identified within the streetscape that would reduce vehicle dominance in line with the Vision Zero Action Plan and Policies T2 and T4 of the London Plan. A highways improvement plan should therefore be secured, the scope of which should be discussed further with both the City and TfL.

Trip Generation

54. The trip generation exercise undertaken for the office use has used data from only one site. The applicant should clarify why other sites have been deselected and include the output data for all comparison sites selected for the office, retail or cultural uses.
55. It is accepted that based on the multi-modal trip generation data provided, the additional trips generated by the scheme are unlikely to have a specific adverse impact upon the strategic transport network.

Pedestrian Comfort Levels (PCL)

56. The proposal development is supported by a PCL assessment. Although broadly acceptable, the PCL exercise should be updated to take account of nearby cumulative development and its impact on footway capacity to the 'proposed peak hour PCLs'.
57. It is acknowledged that development proposals including the introduction of new pedestrian routes through the site, and the revised building footprint and footway decluttering will enhance PCL levels. The assessment demonstrates that PCL levels are further enhanced when proposed improvements to St Brides Street including the reduction in taxi and vehicle parking, restricting vehicle movements and footway widening/ carriageway narrowing are allowed for. Given the expected increase in pedestrian trips and the direct benefit employees and new visitors to the development would experience through these public realm improvements, the applicant, in addition to the applicants of other development in the vicinity should contribute towards these works and approvals required in line with London Plan Policies T2, T4 and D8. These improvements should be secured through s106 agreement, and/or s278 agreement.

Site access and design

58. Proposals to increase permeability through the site by introducing new pedestrian routes connecting Shoe Lane, St Bridge Street and Fleet Street are welcomed and are in line with London Plan Policies T2 and D8. Design measures have also been implemented to address level changes across the site, which is welcomed. Access to the public should be secured by condition or section 106 agreement.
59. The primary access point for cyclists to the east of the site on St Bride Street is prominent and aligns well with existing cyclist desire lines running north-south along St Bride Street and CS6 on Farringdon Street. However, the applicant should clarify how cyclists would navigate the proposed routes and access the Cycle House entrance from St Bride Street. This route for cyclists should not be impeded by street furniture, outdoor dining areas, or by agreement with the management company.
60. Wayfinding for walking and cycling to nearby destinations and public transport nodes should be provided. The Applicant should incorporate the use of Legible London signs within the site, including the updating of the Legible London sign on St Bride's Street. This should be secured through s106 agreement.

Vehicular access and parking

61. The proposed development is car-free except for two blue badge spaces at basement level accessed via Shoe Lane, which accords with London Plan policy T6. Active charging points must be provided for both blue badge spaces in line with London Plan Policy T6.

Cycle parking

62. The quantum of long and short-stay cycle parking complies with London Plan Policy T5 minimum standards which is welcomed. Cycle parking must be designed and laid out in accordance with the London Cycling Design Standards (LCDS).
63. The provision of extensive end of journey facilities for cyclists are strongly supported in accordance with London Plan Policy T5 requirements. Access to the concierge should be ensured for the duration of building's opening hours to ensure that short-stay cycle parking remains available for visitors to the site.
64. The Cycle Hire docking station on St Brides Street would be suspended during the construction phase of development. This docking station is one of the on network and therefore any relocation must ensure continuous operation. This development will also increase demand for cycle hire and therefore generates the need to upgrade and increase capacity. The Applicant should therefore identify an alternative location in consultation with the City of London, should cover the cost which is estimated at £45,000 and contribute proportionately towards further docking station capacity.

Delivery and servicing

65. A Delivery and Servicing Plan (DSP) has been submitted alongside this application in line with London Plan Policy T7. Measures proposed to reduce road danger, noise and emissions generated by freight trips to the site include the use of an on-site consolidation centre, retiming of deliveries outside peak highway, pedestrian and cyclist movement time periods and the promotion of deliveries by cargo-bike, all of which are welcomed. The plan should be secured by way of condition.

Construction logistics

66. An outline Construction Management Plan (CMP) has been submitted alongside the application. A commitment to FORS and the Direct Vision Standard (DVS) is welcomed as it is imperative that road safety measures are incorporated, and preventative measures delivered through the demolition and construction phases of the development. A Construction Logistics Plan (CLP) in full should be secured by condition.
67. Primary access during the construction phase is proposed via St Bride Street and it is noted through the swept path exercise that this arrangement will require the removal of existing taxi drop-off, car and motorcycle spaces as well as the temporary relocation of the Santander Cycle Hire docking station, considered above.

68. It is noted that the proposal for the introduction of a vehicle pit lane along Fleet Street and that this will require the relocation of the bus stop located outside the site. Insufficient justification has been provided for the need for access from Fleet Street including a review of alternatives. The relocation of bus stop and reduction in carriageway space is likely to negatively impact upon bus journey times. Fleet Street is part of the London Central Bus Grid, where the objective is to enhance bus journey speeds. It is therefore important that construction logistics do not negatively impact upon bus services in this location.
69. The CMP has also failed to consider how the operation of a pit lane in this location would impact upon pedestrian, cyclist and bus operations along Fleet Street. Further discussion with both TfL and the City of London will be required to establish the details of construction logistics proposals and to determine their acceptability.
70. A pedestrian routing management plan should be produced, clearly outlining which routes will be temporarily closed during construction and for what duration. Alternative wayfinding will need to be clearly and comprehensively presented and retained for both pedestrians and cyclists at decision points away from the site across the local area to enable alternative routes to be established.
71. The CMP should be further developed to coordinate with surrounding development proposals to actively minimise cumulative construction impact in the area, including Stonecutter Court which will require coordinated logistics and shared access via St Bride Street.

Travel Plan

72. The development should be supported by a Travel Plan that is in line with the TfL guidance. The Travel Plan should focus on increasing the cycling mode share in line with the Mayor's Transport Strategy cycling mode share target for central London.
73. It is requested that a commitment be made within the Travel Plan which requires further measures to be identified should three- and five-year mode shift targets not be achieved.

Sustainability and Environment

Energy Strategy

74. Policy SI2 of the London Plan relates to minimising greenhouse gas emissions and sets out energy strategy requirements for major development proposals, Policy SI3 sets out requirements for energy infrastructure and Policy SI4 sets out requirements to manage heat risk.
75. Once all opportunities for securing further feasible on-site savings have been exhausted, a carbon offset contribution should be secured to mitigate any residual shortfall.
76. The energy strategy submitted is generally compliant with London Plan energy policies. However, additional information regarding the following is required:

- GLA carbon emission reporting spreadsheet;
 - Supporting modelling outputs;
 - Details of heating strategy including details of heat pumps and centralised energy centre;
 - Futureproofed District Heating Network connection drawings;
 - Roof layout and details of PV;
 - Be Seen monitoring commitment; and
 - Whole Life-Cycle Carbon
77. The proposal would result in the requirement of a carbon offset payment calculated using the GLA's recommended carbon offset price of £95 per tonne. This should be secured within a s106 agreement.
78. Detailed comments have been forwarded under separate cover and these will outline specific measures which should ensure compliance.

Air Quality

79. Policy SI 1 (Improving Air Quality) of the London Plan states that any development proposal should not lead to further deterioration of existing poor air quality and not be located or operated in a manner that would subject vulnerable people to poor air quality. An air quality assessment was submitted as part of the submission documents. A review of the assessment indicates that the scheme is broadly compliant with London Plan air quality policies. Notwithstanding this, with regards to backup generators, alternatives to the proposed diesel-fuelled backup generator are recommended, such as hybrid, battery or fuel cell technology. Such alternatives would assist in the scheme meeting with the objectives Part B and C of London Plan Policy SI1 and the City of London's Air Quality SPD. Further, on-site plant must meet the NRMM Low Emission Zone standards for the CAZ in accordance with Part D of London Plan Policy SI 1 and to mitigate impacts during construction an Air Quality and Dust Management Plan (AQDMP) should be secured by condition.

Circular Economy

80. In line with Policy SI 7 of the London Plan, a Circular Economy Statement has been submitted as part of the planning documentation. The document outlines how the scheme aims to minimise the quantities of materials used (conserve resources), responsibly sourcing materials, minimise waste, increase re-use and recycling in order to attempt to achieve net zero-waste. The assessment states that a building circularity calculation would be 51% and that no less than 95% of demolition waste will be recycled. The minimum aim is to divert 90% (by tonnage) of the non-demolition waste and 95% (by tonnage) of the demolition waste from going into the landfill in line with BREEAM. A resource efficiency and site waste management plan will also be implemented on site to minimise waste generation and then manage waste responsibly. Further, an operational waste strategy will also be implemented to ensure municipal waste is managed sustainably. Tenants will be provided with a recycling facility and separate food and glass bins. The statement concludes that the project is committed to the objectives of Policy SI7 of the London Plan. The Council should ensure that those initiatives outline with the statement to reduce waste and encourage reuse are secured.

Flood risk and drainage

81. Policy SI 12 of the London Plan states that all developments should ensure that flood risk is minimised and mitigated and that residual risk is addressed. The site is located within Flood Zone 1 which represents a low risk of flooding. Notwithstanding this, given the scale of the development, a Flood Risk Assessment (FRA) which considered the requirements of the London Plan has been submitted as part of the planning documents. The FRA confirms that the site would not be affected by and tidal breach flood events up to the year 2100, the site has a very low surface water flood risk, the site has a moderate risk of groundwater flooding however there is a low likelihood of groundwater emergence within the site. Further, the FRA concluded that there are no other significant sources of flooding at the site and that safe access/egress to the site would be available for the operational lifetime of the development.
82. A drainage strategy has also been prepared for the development. It is proposed to use below ground geo-cellular tanks to provide attenuation storage for the site which will discharge into the combined sewer in the adjacent highways. Surface water discharge will be limited to the greenfield runoff rate of 2.91 l/s which represents a 98% reduction on the existing 1 in 100 year rate of 163.0 l/s.
83. The Council should ensure that appropriate conditions or legal agreements are secured to ensure that the scheme accords with the objectives of Policy SI 12 of the London Plan.

Biodiversity and urban greening

84. Policy G6 of the London Plan states that development proposals should aim to secure net biodiversity gain and that those proposals that create new or improved habitats that result in positive gains in biodiversity should be considered positively. A Preliminary Ecological Assessment was submitted as part of the submission and confirms the scheme would achieve net gain on site which is welcome.
85. In terms of urban greening, the proposal is subject to London Plan Policies G1 (Green infrastructure) and Policy G5 (Urban Greening). In accordance with these policies, the applicant has calculated the Urban Greening Factor (UGF) as 0.30 when calculated using the London Plan calculation table which meets with the target set by Policy G5 of the London Plan. The target has been achieved through substantial planting on the terraces and extensive green roofs. Although the proposed development presents a well-considered and innovative approach to integrating green infrastructure and urban greening across the scheme, it is noted that no green roofs are proposed on the tallest roofs. The applicant should consider the potential of including green roofs on all available roof space.

Local planning authority's position

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

Legal considerations

87. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless directed otherwise, Councils are required to consult the Mayor again under Article 5 of the Order if they subsequently resolve to make a draft decision on an application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application. In this case, there is no need to refer the application back to the Mayor.

Financial considerations

88. There are no financial considerations at this stage.

Conclusion

89. London Plan policies on CAZ uses, offices, urban design, heritage, strategic views, environment and transport are relevant to this application. The below issues must be addressed to ensure the proposal complies with the London Plan:

- **Land Use Principle:** The development's contribution to the wider strategic functions of the CAZ, with the delivery of new high quality office floorspace (including affordable and retail floorspace), new cultural floorspace and enhanced public realm accords with the London Plan.
- **Urban Design, Heritage and Views:** In terms of design, GLA officers consider that 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 and permeability throughout and around the site. Further, GLA officers are of the view that the proposal will not result in harm to the significance of heritage assets or impact upon locally important or strategic views.
- **Transport:** The car free development is welcome. However, concern is raised with the relocation of bus stops during construction. Additional details on pedestrian comfort levels, wayfinding and compliance with LCDS cycle requirements are also required. A contribution towards the upgrade of the Cycle Hire Docking Station on St Bride Street is requested. Delivery and Servicing, Pedestrian Routing Management and CLP Plans should also be secured.
- **Sustainability and Environment:** Additional clarification is required with regards to energy commitments and requirements. Overall, and subject to securing appropriate conditions, the proposal is not likely to raise any noteworthy environmental concerns.

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Devlia, Neel

From: BCTAdmin@thameswater.co.uk
Sent: 24 August 2021 08:39
To: PLN - Comments
Subject: 3rd Party Planning Application - 21/00538/FULEIA - Amended Response

THIS IS AN EXTERNAL EMAIL

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

Our DTS Ref: 69160
Your Ref: 21/00538/FULEIA - Amended Response

24 August 2021

Dear Sir/Madam

Re: 120, FLEET STREET, LONDON, EC4A

Waste Comments

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

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

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via <https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637653875581338601%7CUnknown%7CTWfpbGZsb3d8eyJWljoimC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C1000&sdata=kGZS9%2BXwTtP9hXDKp7OvkJXX9zA5czKOhq0ExVk8zYA%3D&reserved=0>. Please refer to the Wholesale; Business customers; Groundwater discharges section.

As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be>

8%7C1%7C0%7C637653875581343591%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C1000&data=kTJht8629I0jKuOdGzSobMntwNRm%2BWa2K8hq5o%2BgRDo%3D&reserved=0.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via <https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637653875581343591%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C1000&data=19aH92PVEwHxI0Lw%2BgRVIf267q5dqSNqekZBOG6rZQ%3D&reserved=0>. Please refer to the Wholesale; Business customers; Groundwater discharges section.

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

structures.<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637653875581343591%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C1000&data=kTJht8629I0jKuOdGzSobMntwNRm%2BWa2K8hq5o%2BgRDo%3D&reserved=0>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Water Comments

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

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to

check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637653875581343591%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C1000&sdata=kTJht8629I0jKuOdGzSobMNtwNRm%2Bwa2K8hq5o%2BgRDo%3D&reserved=0>

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

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdevelopers.thameswater.co.uk%2FDeveloping-a-large-site%2FPlanning-your-development%2FWorking-near-or-diverting-our-pipes&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637653875581348588%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C1000&sdata=irkkXJNvXw2ca7ihC8pElmhrHyT8NbQkB6hPGV3xb00%3D&reserved=0>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Supplementary Comments

Following further information regarding the proposed drainage for this site, Thames Water have been able to review their position and can confirm that the conditions relating to foul and surface water are no longer sought. All other comments remain the same.

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
Tel:020 3577 9998
Email: devcon.team@thameswater.co.uk

This is an automated email, please do not reply to the sender. If you wish to reply to this email, send to devcon.team@thameswater.co.uk Visit us online

<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637653875581348588%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C1000&sdata=9dfX3r1Zf%2B0x8Z9w9KyAlm2V3tfb43DKT%2F5tUQIIVww%3D&reserved=0>, follow us on twitter

<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.twitter.com%2Fthameswater&data=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637653875581348588%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IklhaWwiLCJXVCI6Mn0%3D%7C1000&sdata=6fkFM146tFF7dUb1cM8TByHs8XuHzb%2FA1QpYlj5c9hl%3D&reserved=0>

=0 or find us on

<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.facebook.com%2Fthameswater&d ata=04%7C01%7C%7C2532e9e10ae8422dabe108d966d246ec%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0 %7C637653875581348588%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I k1ha WwiLCJXVCi6Mn0%3D%7C1000&sdata=q4J7NYTLCi4cTKEul8PkRev8wI05%2BTzldhLi0JH9JuY%3D&reserve d=0>. We're happy to help you 24/7.

Thames Water Limited (company number 2366623) and Thames Water Utilities Limited (company number 2366661) are companies registered in England and Wales, both are registered at Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB. This email is confidential and is intended only for the use of the person it was sent to. Any views or opinions in this email are those of the author and don't necessarily represent those of Thames Water Limited or its subsidiaries. If you aren't the intended recipient of this email, please don't copy, use, forward or disclose its contents to any other person – please destroy and delete the message and any attachments from your system.

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

Proposal: 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.

(The proposal would provide 61,135sq.m GIA of Class E offices, 2,051sq.m GIA of flexible retail use (Class E), 2,748sq.m GIA of Sui Generis public roof terrace, 1,331sq.m GIA of learning and non-residential institution use (Class F1), 2,776sq.m GIA of flexible and non-residential institutions/commercial business and service; Total floorspace 78,456sq.m GIA. Overall height 93.15m AOD). The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.)

Case Officer: Kurt Gagen

Customer Details

Name: Dr Kirsty Mann

Address: Flat 19 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: I am the owner of Flat 19, 6 Bolt Court, EC4A 3DQ.

I object for 3 reasons:

Firstly, due to a lack of any restrictions of use for the proposed outdoor terraces. Given the amount of terrace space, there could be a substantial noise disturbance to residents if no restrictions are

imposed. I refer to local policy:

Local Plan Policy DM 21.3:

"The amenity of existing residents within identified residential areas will be protected by: Resisting other uses which could cause undue noise disturbance.

Draft Plan Policy HIC3:

"A noise assessment will be required where they may be an impact on noisesensitive uses. The layout, orientation and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noisesensitive land uses such as housing, hospitals, schools, nurseries and quiet open spaces." I am not aware of any noise assessment having been carried out.

Secondly, your daylight and sunlight report concludes there will be increased overshadowing of my building. This is also contrary to local policy:

Draft Plan Policy HIC3

Developers must consider the noise and lighting impacts of their development.

Local Plan Policy DM 21.3

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."

Third, the building is excessively tall and not in keeping with the surrounding Conservation Area.

I respectfully request the following changes are made to the plan:

- Impose restrictions on the use of roof terraces so they cannot be used outside of office hours or for any social gatherings with live music or sale of alcohol.
- Reduce the overall height of the new building to minimise over shadowing to residential buildings in the vicinity.

Tel: 020 8921 5222



Mr Kurt Gagen
City of London
PO Box 270
Guildhall
London
EC2P 2EJ
21/2630/K
Your Ref:21/00531/FULEIA
27 August 2021

**Directorate of Regeneration,
Enterprise & Skills**
The Woolwich Centre, 5th Floor
35 Wellington Street
London, SE18 6HQ

DECISION NOTICE - RAISE NO OBJECTION

Dear Mr Gagen,

Town & Country Planning Act 1990 (As Amended)
The Town and Country Planning (General Permitted Development) (England) Order 2015

Site: 120 Fleet Street, London, EC4A 2BE

Applicant:

Proposal: 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.

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(The proposal would provide 61,135sq.m GIA of Class E offices, 2,051sq.m GIA of flexible retail use (Class E), 2,748sq.m GIA of Sui Generis public roof terrace, 1,331sq.m GIA of learning and non-residential institution use (Class F1), 2,776sq.m GIA of flexible and nonresidential institutions/commercial business and service; Total floorspace

78,456sq.m GIA. Overall height 93.15m AOD). The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.)

Drawings

Consultation Letter from City of London dated 14th July 2021.

I refer to your letter dated 14 July 2021 enclosing details in respect of the above.

The Royal Borough has now formally considered the matter and raises no objections.

The Council has **NO** further observations to make.

Thank you for consulting me on this matter.

Yours faithfully

Assistant Director

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

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Case Officer: Kurt Gagen

Customer Details

Name: Mr Alexander Scurlock

Address: Flat 23 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I am writing to object to the proposed planning application. As an owner in the adjacent building at 6 Bolt Court, I am concerned about the use of the proposed terraces and the noise/loss of privacy which will result. In addition the size of the proposed development risks dominating our residential building overshadowing the property. Yours A Scurlock

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

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Case Officer: Kurt Gagen

Customer Details

Name: Mrs Henrietta Fudakowski

Address: 3 Colville Place Colville Place London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: I am the owner of a flat in Bolt Court which will be impacted by this development. Morning sun light will be much diminished and the new balconies have the potential to be very noisy. The quiet character of Bolt Court will be severely impacted. Smoking terraces have a detrimental impact on neighbours both in terms of noise and air quality.

Flat R
Sovereign House
5 Poppins Court
London
EC4A 4AX

1 September 2021

Mr K Gagen
Development Division
Department of Built Environment
City of London

By email: PLNComments@cityoflondon.gov.uk

Dear Mr Gagen

Location: 120 Fleet Street London EC4A 2BE

Your reference: 21/00538/FULEIA

Please be advised that I object to this development on grounds that it will impose a significant cost to my immediate family and me:

- ◆ in the form of quality of life reduction;
- ◆ potentially, and very likely, through negative impacts on our health;
- ◆ potentially, and very likely, in pecuniary terms.

Background

I live full time with my wife and daughter in our flat. We have no other property to which we can escape.

I am in my 60's, my spouse her late 50's. I am retired and neither I nor my wife have an office to go to during weekdays.

Quality of Life Considerations

The noise, dust and vibrations will be a source of great distress. The proposed development is only 6 yards away from our bedroom.

In the summer it may become unbearable. London becomes very hot and humid and we tend to have the windows open almost 100% of the time. The works associated with stripping the current building, which have been underway for some time now, have been causing me a great deal of distress when the windows are open (though much improved since the sound dampening measures were put in place). **This disturbance would go up by an order of magnitude should the proposed development go ahead.**

The noise will be very bad even with the windows shut, but in the summer months the choice will be (a) to absolutely swelter with considerable noise, or (b) to be cooler but be subject to excruciating levels of noise and to allow the dust to enter unimpeded.

Dust will be a source of personal inconvenience in that it will ruin bedding, soft furnishings and blinds and much additional cleaning and maintenance will be required.

Being on the fourth floor of our building, we currently get a surprising amount of natural light into our flat, including direct sunlight at times. With the proposed building being very tall indeed, my understanding is that our light and direct sunlight will reduce. This will reduce our quality of life after the building has been constructed. The public square with seating and plants in St Brides Street, immediately adjacent to our building, will also suffer a loss of light and sunlight.

Health

The dust is likely to cause respiratory problems. Furthermore I suffer from tinnitus. This combined with the noise will likely cause a deterioration in my mental health.

Pecuniary Aspects

Our building was built long before the advent of reinforced concrete buildings and is a simple brick structure. I'm not convinced it can withstand the constant shaking that will accompany the works and I am concerned that the building will

deteriorate possibly to a significant extent. If this happens it is likely that I and all other owners of flats in Sovereign House will bear the associated losses that will emanate from this deterioration. The losses would result from remedial works needed (some may be needed in the short term; some may only emerge a long time after the works have been completed) and possibly loss in market value on any future sales of our flats.

We have no assurances on being compensated for such losses. Any verbal or written assurances would be of little value as any dispute will put the burden of proof on me and the other owners, not the developers. Furthermore the developers may go out of business or be reconstituted in a way that the current business entity no longer exists with assets being transferred to other entities. This would leave us without any possibility of recompense.

We normally go away for holidays in the British winter. The works are likely to force us to holiday, or to find alternative accommodation, in the summer to get away from the noise, dust and vibrations. This would be expensive.

We may need to upgrade windows to make them better sealed to keep out dust and be more soundproofed to keep out noise. This would be expensive. It also won't solve the problem of needing to open windows during hot weather.

Conclusion

The works will place a heavy burden on my and my family's lives. This is likely to be for 3 or more years and construction works are notorious for overrunning, so probably longer.

For me this means that optimistically 20% to 30% of my remaining life is going to be severely impacted by these works.

Essentially I am being asked to pay a very significant price for someone else's commercial benefit.

I therefore object in the strongest possible terms.

I thank you for your consideration of this submission.

Yours sincerely,

Allen White

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

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Case Officer: Kurt Gagen

Customer Details

Name: Mr Timothy Parker

Address: Flat 21, 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: This proposal is fundamentally incompatible with §130(c) of National Planning Policy Framework, which requires that planning decisions "are sympathetic to local character and history, including the surrounding built environment and landscape setting..." The proposed 21-story development is fundamentally at odds with both the character and user of the surrounding neighbourhood. It would detract substantially from the charming and sleepy character of the small

laneways to the north of Fleet St / east of Fetter Ln.

I am also very concerned about noise disturbance local residents will suffer from the change of user (cf. Local Plan Policy DM 21.3), particularly given the proposal for various open terraces.

The proposed height and aspect of the new building would, if allowed, overshadow the surrounding area, cutting off sunlight to my building and those of other residents in the area (contrary to Local Plan Policy DM 21.3). It will also result in a considerable diminution of privacy.

The imposing structure of the proposed development will dominate - and diminish - the significance of the historic monuments very nearby, including St Paul's Cathedral, Temple, and other major London landmarks, and intrude on lines of sight from much further afield.

The plan should not be approved in its current form. Restrictions on height and overall size should be imposed, limiting redevelopment to the current scale. Moreover, restrictions on user (particularly as regards any outdoor spaces / terraces) are necessary to prevent noisy activities (including preventing the use of such spaces for noise generating activities such as dining or the consumption of alcohol) from diminishing the quality of life of area residents and workers. Absent such conditions, permission to proceed must be refused.

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

Proposal: 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.

(The proposal would provide 61,135sq.m GIA of Class E offices, 2,051sq.m GIA of flexible retail use (Class E), 2,748sq.m GIA of Sui Generis public roof terrace, 1,331sq.m GIA of learning and non-residential institution use (Class F1), 2,776sq.m GIA of flexible and non-residential institutions/commercial business and service; Total floorspace 78,456sq.m GIA. Overall height 93.15m AOD). The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.)

Case Officer: Kurt Gagen

Customer Details

Name: Mr Allan O'Neill

Address: Flat 15 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: The proposed new buildings will overshadow neighbouring buildings which I would like to object to.

Also I would like to strongly object to the fact that there are restrictions on alcohol use on the outdoor terraces which could affect the privacy of the local area.

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

Proposal: 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.

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Case Officer: Kurt Gagen

Customer Details

Name: Dr Rosemarie Hutchinson

Address: Flat 4 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment:1. The redevelopment of River Court to a height of 20 aboveground storeys is excessive. This will have a detrimental effect on the historic environment of Fleet Street. A building of this height, that stretches for a considerable length of the street, will dominate the skyline to the detriment of the existing historic buildings and overwhelm the narrow courts off Fleet Street. The height of new buildings should be no higher than the existing ones to protect the historic character

2. The Fleet Street Conservation Area is under considerable threat. A recent planning approval to demolish some of the historic buildings will undeniably detract from the historic nature of the street. A 20 storey modern building will certainly also have an adverse effect. The area is at risk of fundamental change as the precedents are set for demolition of historic buildings and replacement with modern and inappropriately high buildings which may dominate the character of the conservation area.

From: [REDACTED]
To: [PLN - Comments](#)
Cc: [Priest, Henrika](#); [Gagen, Kurt](#)
Subject: Objection to proposed 120 Fleet Street development
Date: 02 September 2021 09:56:49

THIS IS AN EXTERNAL EMAIL

Dear Sir,

I am the owner of Flat B , Sovereign House , 5 Poppins Court . I have been made aware of the recent planning application of 120 Fleet Street .

Sovereign House is a residential building & the proposed building work spanning over 5 years (May be more) would create intolerable disruption to its inhabitants. Currently my flat is tenanted & it has already reduced its value due to the noise level & disruption.

It will be virtually unusable with the proposed new building plans without any mitigating considerations re: noise , pollution , access to our residential block of flats .

For such a long period of development of such proportion so close to city residents without any due consideration to their daily life can never be a successful one in the end .

Please allow extensive discussion as to how during building work a reasonable approach could be taken without imposing a major disruptive circumstances in the residents' daily life. Seeking early cooperation from resident neighbours would make things viable on both sides .

Thanks

Mrs Palit

(Flat B Sovereign House 5 Poppins Court)

Sent from my iPhone

From: [REDACTED]
To: [PLN - Comments](#)
Subject: 21/00538/FULEIA - 120 Fleet Street - Objection
Date: 02 September 2021 18:34:08

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

I am the owner occupier of Flat 3, 2 Bride Court, EC4Y 8DU and am writing to object to the current 120 Fleet Street redevelopment plans (Ref 21/00538/FULEIA) on the following grounds.

The proposed building height and consequent scale of the building is not in keeping with the surrounding conservation area and will dwarf the surrounding Fleet street area.

The skyline view from my terraces is the same direction as the view from St Bride's Church courtyard which will be severely impacted due to the height of the building and subject to night time light pollution and day time solar glare.

The number and height of the proposed roof terraces will impact my right of privacy as the Fleet street terraces will look down into my main living area and both bedrooms.

The principle of redeveloping 120 fleet street is welcome but the current design, in particular the sheer height of the building, is unsympathetic to the historic character of the area.

Thank you for your consideration.

Stuart Atkinson
Flat 3
2 Bride Court
EC4Y 8DU

From: [REDACTED]
To: [PLN - Comments](#)
Subject: 120 Fleet Street Development Ref: 21/00538/FULEIA - Objection
Date: 02 September 2021 18:49:11

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam

I am the owner of Flat A Sovereign House, 5 Poppins Court, EC4A 4AX, and am responding to the planning application for 120 Fleet Street. Ref: 21/00538/FULEIA

I previously resided in the property for 11 years, and now rent the property to professional tenants and am concerned that, as Sovereign House is a residential home, the proposed development is going to be significantly detrimental in terms of impact. My concerns and basis of objection as follows:

1/ During the period of development, which I understand could be for up to 5 years, it will be unbearable in terms of noise and disruption given the very close proximity to Sovereign House, which is only a few meters from the perimeter of the development site. Already Sovereign House has experienced noise and vibrations from preparatory works, during unsociable hours and without any notice or adequate mitigations to control the noise and vibration impacts. I am concerned that ongoing works will also put at risk the integrity of Sovereign House (e.g. vibrations and construction works causing structural damage to our period building), as well as making the property unbearable to live with the noise, pollution and access disruptions over an extended period. This will directly impact the rental value and demand for the property which will reduce the level of income on which I rely. The appropriate mitigation of the disruptions and compensation options to residential owners needs to be addressed.

2/ Sovereign House is directly next door to the proposed development so the significant increase in height of the building will reduce the amount of light into my property which faces onto both Poppins Court and St Brides Street. The height of the building seems unnecessarily tall and completely out of character for the direct surrounding conservation area. The height of the proposed development is a major concern and needs to be reviewed to be more in keeping with the conservation area and nearby historical buildings (e.g. St Brides Church).

3/ Related to the size of the building expanse of glass being proposed, I am also concerned about the lack of privacy from the development into my property. My bedroom and main living area faces onto Poppins Court, so windows from the development which face towards Sovereign House will look directly into my property and privacy will be of concern. The privacy into residential neighbours needs to be adequately addressed.

4/ With the inclusion of roof terraces, this provides potential for ongoing noise nuisance from social events, in addition the increase in leisure units (e.g. restaurants, bars) will exacerbate the number of local establishments that already cause noise saturation and unsociable behaviour from late night drinking. Clarity on what the terraces will be used for, and with appropriate restrictions to ensure neighbours are not adversely impacted from the leisure units, needs to be addressed.

I do agree that Fleet Street is in need of regeneration and would welcome sympathetic

redevelopment and investment, but the overall 120 Fleet Street development is just not in keeping with the area, in particular the sheer size needs to be scaled back to be more appropriate for the direct surrounding area.

Thank you for your consideration of my concerns.

***Please note:** The comments from Mrs Santwana Palit from Flat B Sovereign House have been uploaded to the COL website as being from Flat A. Please can you amend so it is clear Mrs Palit's comments are for Flat B Sovereign House.

Vanessa Roguska

Flat A Sovereign House, 5 Poppins Court, EC4A 4AX

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

Proposal: 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.

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Case Officer: Kurt Gagen

Customer Details

Name: Mrs Sarah Field

Address: Flat 22 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise

Comment: We are worried about noise from social gatherings and would request restrictions on the use of roof terraces - we would not want any music or alcohol licenses to be granted. This would impact our enjoyment of our flat hugely. We currently enjoy a quiet environment and are obviously keen for this to continue. We would also wish for the height of the proposed building to be significantly reduced so that neighbouring residential properties are not overshadowed or overlooked. Thank you.

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

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Case Officer: Kurt Gagen

Customer Details

Name: Mr Toby Brown

Address: 6 Bolt Court London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other
- Residential Amenity

Comment: Dear Sir/Madam

I write as a long term local resident in the City, where I have lived and worked (as a barrister) for many years.

The proposed development is very close to my apartment, and I am concerned about it for a number of reasons.

First, it is completely out of character for this historic area, both in design and because of its abnormal height. The Corporation will be aware of the importance of maintaining the historic look and feel of the Fleet Street and St Paul's area.

Second, the proposal development fails to take into account the impact on local residents, and where I live is one of the few protected areas in the City. This is even more of a factor when more residents are likely to live in the City post pandemic.

From my experience, open terraces are likely to create significant noise disturbance during the day and evening.

I therefore ask that the Corporate refuse planning permission for the proposal. If it is to proceed, it should be modified into a design that accords with the local historic area, and with a significantly lower height, and with terraces removed or at least planning restrictions imposed on their use.

Many thanks for considering my objection. I would like to attend any planning meeting to make my objections orally.

Yours sincerely,

Toby Brown

Comments for Planning Application 21/00538/FULEIA

Application Summary

Application Number: 21/00538/FULEIA

Address: 120 Fleet Street London EC4A 2BE

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Case Officer: Kurt Gagen

Customer Details

Name: Mr Darren shapland

Address: Flat 11 - Gough House 6 Bolt Court City of London

Comment Details

Commenter Type: Neighbour

Stance: Customer objects to the Planning Application

Comment Reasons:

- Noise
- Other

Comment: The building height is excessive and will overlook all other buildings and change the look of the area which is famous and historical.

If a bar or similar is allowed at upper levels of the building this will cause excess noise and disturbance to our building and potentially impact values of properties in the area which are used

for residential use.

Application ref: 2021/3443/P
Contact: Patrick Marfleet
Tel: 020 7974 1222
Email: Patrick.Marfleet@camden.gov.uk
Date: 7 September 2021

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

Phone: 020 7974 4444

planning@camden.gov.uk
www.camden.gov.uk/planning

Kurt Gagen
City of London

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Request for Observations to Adjoining Borough - No objection

Address:
120 Fleet Street
London
EC4A 2BE

Proposal:

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.

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Drawing Nos: Cover letter dated 14 July 2021 ref 21/00538/FULEIA

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises no objection.

Informative(s):

1 Reasons for no objection-

The overall size and scale of the proposed development and relatively significant distance from the borough boundary would ensure that no harm is caused to the character and setting of the nearby Bloomsbury Conservation Area to the north. Similarly, the proposals are not considered to cause harm to the residential amenities or transport conditions in the borough of Camden. The application should be therefore be determined under City of London's relevant planning policies.

Yours faithfully



Daniel Pope
Chief Planning Officer

City of London Conservation Area Advisory Committee

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

17th September 2021

Dear Sir/Madam,

At its meeting on 2nd September 2021 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

**C.88 21/00538/FULEIA - 120 Fleet Street, London EC4A 2BE
Fleet Street Conservation Area/Castle Baynard Ward. No Ward Club rep.**

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.

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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 street scape. 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 the Conservation Area.

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

Yours faithfully,

Mrs. Julie Fox
Secretary

DECISION NOTICE

LBS Registered Number: 21/OB/0047

Date of issue of this decision: 22/09/2021



www.southwark.gov.uk

In accordance with your letter received on 19 July 2021 and supporting documents.

The Council's formal response is

1. Southwark Council would like to comment as follows:

The proposal does not affect any of the LVMF views where Southwark Council is a Statutory Consultee. 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 viewer's ability to recognise and appreciate any of the Strategic Landmarks in these views. No objection is raised.

Signed: *Stephen Platts*

Director of Planning and Growth

Site address: 120 Fleet Street London EC4A 2BE

Reference: 21/OB/0047

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

Planning.applications@southwark.gov.uk ;

Your Ref:
Our Ref: 21/02947/OBS



Kurt Gagen

Department Of The
Built Environment
City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

24th September 2021

RE: REQUEST FOR OBSERVATIONS

Dear Kurt Gagen

**DECISION NOTICE
TOWN AND COUNTRY PLANNING ACT 1990.**

REQUEST FOR OBSERVATIONS

I refer to your application detailed below and have to inform you that this Council has considered the under-mentioned proposal and **RAISES NO OBJECTION**

Application Number: 21/02947/OBS Date of Application: 19.07.2021 Date of Decision 24.09.2021

Proposed Development At:
Adjoining Borough Observations Within The Corporation Of London

For:	<p>Observations on a proposed development within the adjoining Borough of City of London at 120 Fleet Street, London EC4A 2BE 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.</p> <p>Change of use of Daily Express Building from office (Use Class E) to learning and nonresidential 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</p>
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Lambeth Planning
PO Box 734
Winchester
SO23 5DG

Telephone 020 7926 1180
Facsimile 020 7926 1171
www.lambeth.gov.uk
planning@lambeth.gov.uk

	<p>andshopfront and associated works.</p> <p>(The proposal would provide 61,135sq.m GIA of Class E offices, 2,051sq.m GIA of flexible retail use (Class E), 2,748sq.m GIA of Sui Generis public roof terrace, 1,331sq.m GIA of learning and non-residential institution use (Class F1), 2,776sq.m GIA of flexible and nonresidential institutions/commercial business and service; Total floorspace 78,456sq.m GIA.</p> <p>Overall height 93.15m AOD). The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.)</p>
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Approved Plans

Conditions

Notes to Applicant:

1 LB Lambeth raises no objection to the development but would draw the City of London's attention to the potential impacts on the appreciation of view towards the City from Lambeth.

From Queen's Walk promenade on the South Bank between Festival Hall and Bernie Spain Garden's, St Bride's Church can be appreciated against the sky and with no neighbouring buildings of height to compete with the spire on the skyline. The proposal may appear in the backdrop of the spire particularly from the east of the riverfront promenade and from Bernie Spain Gardens.

The South Bank is one of the main vantage points towards St Bride's Church and the proposal may represent a harmful impact on the setting of the listed building. The proposal is visible in locally designated view NE from The National Theatre terrace to St Pauls Cathedral.

Lambeth's local views policy (Q25) recognises the view of the Cathedral which the proposal will not interrupt. However, the proposal will affect the wider skyline, diminishing the impact of the City's historic spires. Specifically, the foreground skyline will be negatively impacted. Until recently, historic stone spires have continued to dominate the river edge and foreground skyline with taller buildings being limited to the City cluster. This proposal will introduce a new, tall massing amongst the cluster of historic spires. This impact will be felt from various public vantage points along the South Bank

Yours sincerely

Rob Bristow

Assistant Director Planning, Transport & Development
Growth, Planning and Employment Directorate

Date printed: 24th September 2021

24th September 2021

Kurt Gagen
Principal Planning Officer
Environment Department
City of London
Guildhall
London EC2V 7HH

DP9 Ltd
100 Pall Mall
London SW1Y 5NQ

Registered No. 05092507

telephone 020 7004 1700
facsimile 020 7004 1790

www.dp9.co.uk

120 FLEET STREET – RESPONSE TO HERITAGE CONCERNS

Dear Kurt,

We write in relation to consultation responses received from Historic England, the 20th Century Society, the Conservation Area Advisory Committee (CAAC), and the Ancient Monuments Society in relation to planning application 21/00538/FULEIA for the Proposed Development at 120 Fleet Street.

Setting of Daily Express Building and Fleet Street Conservation Area

The responses are conflicting in their view of the Proposed Development's impact on the setting of the Daily Express Building. The Twentieth Century, whilst welcoming the proposals for the Express building itself, argue that the design of the new 120 Fleet Street building will lessen the impact of the Daily Express Building by continuing its Art Deco inspired design, reducing its standalone visual prominence as a result. The CAAC are of the view the Proposed Development will harm the setting of the Daily Express building and the Fleet Street Conservation Area due to its size and scale, going on to say the incongruous design of the façade would have a detrimental effect on the latter.

In contrast, Historic England and the Ancient Monuments Society share the view that the proposed development will enhance the setting of the Express. In their letter from the 27th July 2021, Historic England state *'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'*.

The Ancient Monuments Society *'welcome the proposed separation of the Grade II* listed former Daily Express Building from the adjoining development'* which they label *'a positive outcome that will enhance both the significance and appearance of this important heritage asset.'* Despite this, the Society do raise concerns over the increase in size and scale of the new building and the impact this would have on the setting of the Daily Express Building.

In response to these concerns, we would highlight that the Proposed Development occupies almost the same footprint as the existing River Court building, with the principal difference being that it has been reduced in extent around the Daily Express building. This change allows the Daily Express building to



stand on its own (enhancing its significance as noted above) and allows new pedestrian routes to be created through the Site (as advocated by Historic England).

The massing of the Proposed Development steps away from the listed building and the Conservation Area, enhancing the significance of the Fleet Street Conservation Area with a built frontage to Fleet Street of a significantly greater quality than the existing building. The restrained high-quality design at street level will ensure the principal focus will be the views into the revealed Art Deco upper foyer of the Daily Express Building, enhancing its significance and prominence.

Although the Art Deco façade of the 120 Fleet Street building will create less contrast with the Daily Express Building than the existing building, the setting back of the building will allow the Daily Express building to achieve greater prominence and significance than it does currently. The GLA share this view, stating *'GLA officers are of the opinion the architecture with a modern Art Deco approach is strong and responds well to the character of the Daily Express building without detracting from its own significance.'*

Given the reasons set out above, we are of the view that the concerns raised by Historic England, the Twentieth Century Society, the CAAC and the Ancient Monuments Society are adequately addressed.

LVMF view 16B.1 The South Bank: Gabriel's Wharf viewing platform

Historic England and the Ancient Monuments Society have raised concerns regarding the impact of the Proposed Development on LVMF view 16B.1. Historic England believe the Proposed Development will cause harm *'in the middle of the less than substantial spectrum'* referring to both the Strand and Temple Conservation Areas.

Firstly, the Strand Conservation Area is not visible in view 16B.1 and the Proposed Development would not appear in its backdrop.

The Townscape and Visual Impact Assessment submitted in support of the application demonstrates that the massing of the Proposed Development has been carefully articulated to sit comfortably within both its local and wider context, including within LVMF view 16B.1. The building will be seen in the backdrop of the view, beyond the Temple Conservation Area, as 6 New Street Square and Peterborough Court can be seen today (as well as the Barbican towers beyond the Whitefriars Conservation Area to the east). As noted in the London View Management Framework, the scale of development in this view gradually increases from west to east with *'the more recent institutional and commercial developments around Fleet Street and Ludgate in the City'*. The Proposed Development continues this pattern. There will be no effect on the viewer's ability to appreciate St Paul's Cathedral or the Temple Conservation Area in the view.

This view is shared by the GLA, who state *'the proposed building is located away from St Paul's falling within a cluster of other commercial buildings that form part of the surrounding urban context. The proposal is of a scale similar to surrounding buildings and would therefore not be prominent, thereby allowing St Paul's to remain the principal landmark within these views.'*



We hope you find the above helpful in setting out our response to the comments that have been raised.
Yours faithfully

DP9 Ltd.

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