

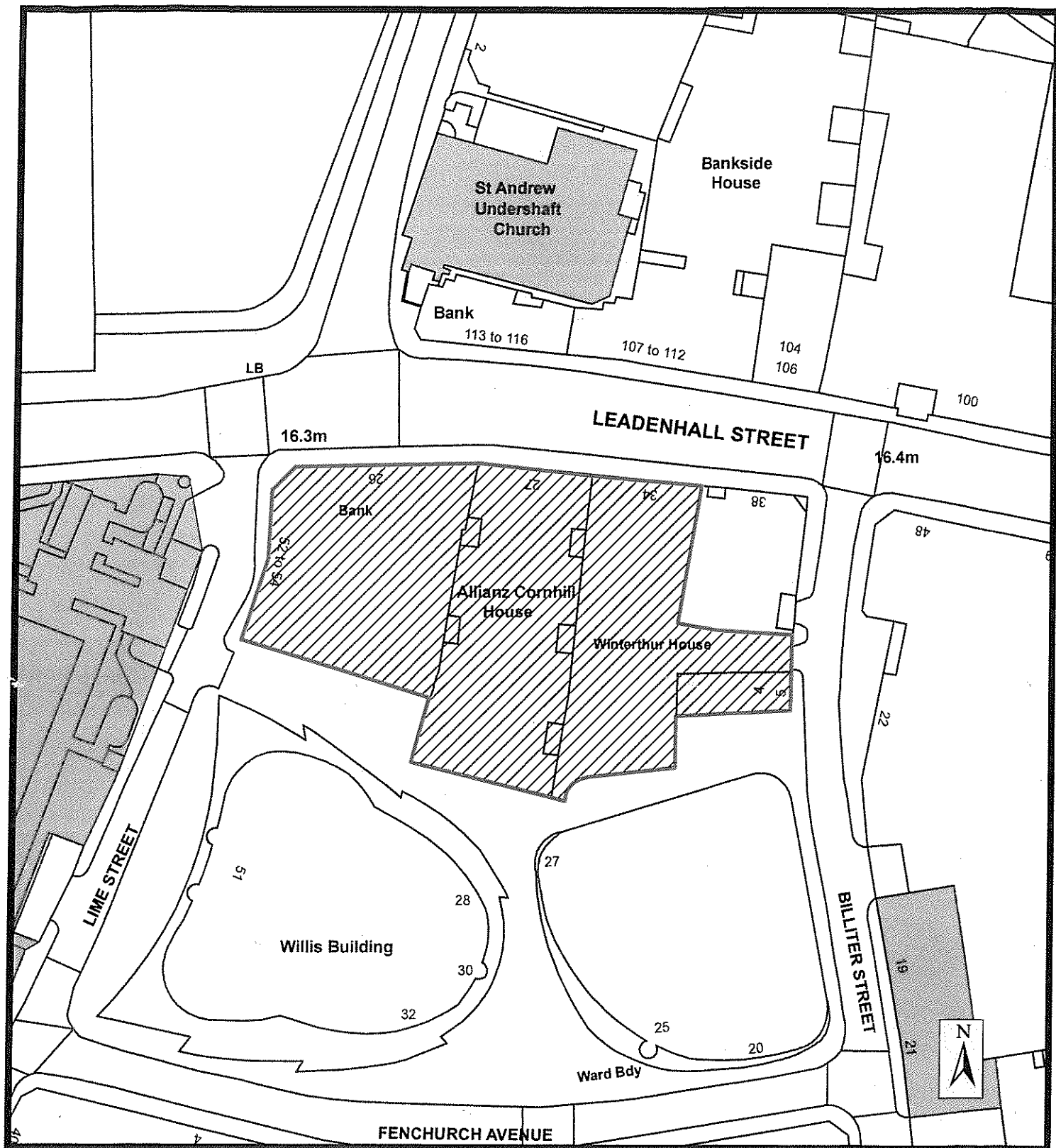
<b>Committee:</b>	<b>Date:</b>	<b>Item no.</b>
Planning and Transportation	15 January 2013	
<b>Subject:</b> 52-54 Lime Street & 21-26 Leadenhall (Prudential House), 27 & 27A Leadenhall Street (Allianz Cornhill House) & 34-35 Leadenhall Street & 4-5 Billiter Street (Winterthur House) London EC3 Demolition of the existing buildings and erection of 2 basement levels and ground plus 38 storey tower comprising office (Class B1) use [58,196sq.m GEA] and retail (Class A1/A3) uses [1,072sq.m GEA] with ancillary access, servicing and landscaping. [Total 59,268sq.m GEA]		
<b>Ward:</b> Aldgate	<b>Public</b>	<b>For Decision</b>
<b>Registered No:</b> 12/00870/FULEIA	<b>Registered on:</b> 20 September 2012	
<b>Conservation Area:</b> No	<b>Listed Building:</b> No	
<p style="text-align: center;"><b><u>Summary</u></b></p> <p>Planning permission is sought to construct a new tower rising to 206.5m A.O.D comprising two basement levels, ground, mezzanine and 37 upper storeys (including two plant storeys). The proposed building would provide a total of 59,269sq.m comprising 58,197sq.m of office (Class B1) use, 104sq.m of shop (Class A1) use and 968sq.m of restaurant (Class A3) use. A new open space would be created on the west side of the development at the junction of Lime Street and Leadenhall Street.</p> <p>The proposed building would sit within the Eastern Cluster of tall buildings and would contribute to the richness of architecture in the City and to the area's character in general.</p> <p>The development would not harm the Outstanding Universal Value, special architectural and historic interest or setting of the Tower of London World Heritage Site and would not detract from the setting of nearby conservation areas or the setting of adjacent listed buildings.</p> <p>The proposals support the strategic objectives of the City of London and would support the economic policies of the London Plan and Core Strategy.</p> <p><b>Recommendation</b></p> <p>(a) The Mayor of London be given 14 days to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town &amp; Country</p>		

Planning (Mayor of London) Order 2008);

(b) Planning permission be GRANTED for the above proposal in accordance with the details set out in the attached schedule subject to planning obligations and other agreements being entered into in respect of those matters set out in the report, the decision notice not to be issued until such obligations have been executed;

(c) That your officers be instructed to negotiate and execute obligations in respect of those matters set out in the report under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.

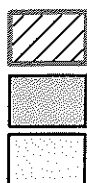
# Site Location Plan



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ADDRESS:  
52-54 Lime Street

CASE No.  
12/00870/FULEIA

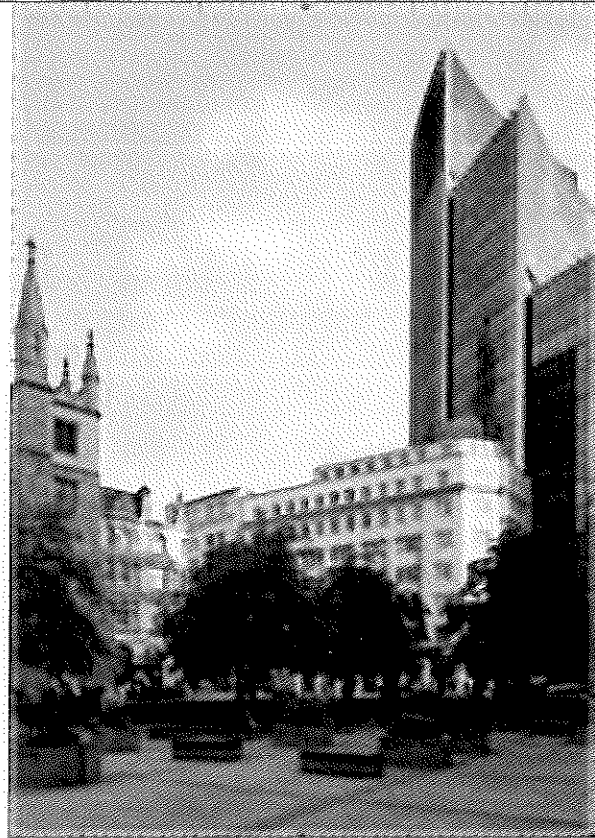


SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY





Leadenhall Street frontage



Leadenhall Street frontage



Lime Street frontage

### **Environmental Impact Assessment**

1. This application is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them, are properly understood by the public and the competent authority before it makes its decision.
2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from member of the public about environmental issues.
3. The Environmental Statement must include at least:
  - A description of the development comprising information on the site, design and size of the development;
  - A description of the measures envisaged in order to avoid, reduce and, if possible, remedy significant adverse effects;
  - The data required to identify and assess the main effects which the development is likely to have on the environment;
  - An outline of the main alternatives studied by the applicant or appellant and an indication of the main reasons for his choice, taking into account the environmental effects;
  - A non-technical summary of the information provided; and
  - Any other information necessary to consider the environmental effects of the proposal.

### **Site and Surroundings**

4. Located within the 'Eastern Cluster', the site forms the majority of a street block bounded by Leadenhall Street to the north, Billiter Street to the east and Lime Street to the west. To the south is 51 Lime Street (the Willis Building) and its new piazza.
5. The area is characterised by post-war commercial development, consisting of office uses (generally linked with the insurance trade) with some retail uses at ground floor level. There are residential uses in Creechurch Lane and Mitre Street and two flats that are ancillary to offices at 49 Leadenhall Street/22 Billiter Street.
6. The site covers 0.33ha and is formed by three existing buildings:
  - 52-54 Lime Street & 21-26 Leadenhall Street (Prudential House);
  - 27 & 27A Leadenhall Street (Allianz Cornhill House) and;
  - 34-35 Leadenhall Street & 4-5 Billiter Street (Winterthur House).
7. 38 Leadenhall Street is not part of the site and would remain on the corner of Billiter Street.
8. The existing buildings total 13,778sq.m (NIA)/19,974sq.m (GEA) comprising the following uses:

- Office (Class B1) - 12,724sq.m
- Shop (Class A1) - 60sq.m
- Financial and professional services (Class A2) - 436sq.m
- Restaurant (Class A3) - 558sq.m

[Figures are NIA]

9. Within the Eastern Cluster there are a number of existing and under construction tall commercial buildings including:
  - The Lloyd's Building, 1 Lime Street (14 storeys, 88m AOD);
  - The Willis Building, 51 Lime Street (26 storeys, 125m AOD);
  - 30 St Mary Axe, Swiss Re (41 storeys, 180m AOD);
  - Tower 42 (42 storeys, 200m AOD);
  - Aviva Tower, 1 Undershaft (28 Storeys, 133m AOD);
  - Heron Tower including its mast (43 storeys, 238m AOD);
  - 122 Leadenhall Street (48 storeys, 225m AOD –construction commenced);
  - The Pinnacle (62 storeys, 305m AOD – currently under construction).
10. There are a number of listed buildings in the vicinity.

### **Proposal**

11. It is proposed to demolish the existing buildings and construct a new tower rising to 206.5m A.O.D comprising two basement levels, ground, mezzanine and 37 upper storeys (including two plant storeys). The proposed building would generate a total of 35,195sq.m (NIA)/59,269sq.m (GEA) providing the following uses:
  - Office (Class B1) - 37,564sq.m (NIA)/58, 197sq.m (GEA)
  - Shop (Class A1) - 98sq.m (NIA)/104sq.m (GEA)
  - Restaurant (Class A3) - 883sq.m (NIA)/968sq.m (GEA)
12. A new open space would be created on the west side of the development at the junction of Lime Street and Leadenhall Street.
13. The main pedestrian access to the office use would be located on the north-west corner on Leadenhall Street, with a second pedestrian access on Lime Street. A retail unit (Class A1) is proposed on the Leadenhall Street frontage and a café (Class A3) is proposed adjacent to the open space on Lime Street. A basement restaurant would be accessed from the Leadenhall Street frontage.

### **Consultations**

14. The views of other City of London departments have been taken into account in considering the redevelopment scheme. Some detailed matters remain to be dealt with through conditions and the provision of a Unilateral Undertaking by the applicants under Section 106 of the Town and Country Planning Act 1990

in relation to the demolition and re-construction as well as other related legal procedures.

15. The planning application was publicised in the press and on site. Individual letters were sent to the occupants of nearby residential properties.
16. The applicants gave a presentation of the scheme to invited neighbours on the 19th September 2012.
17. The Environment Agency had no objection to the development but did comment on the possible effects on groundwater levels.
18. English Heritage was consulted and acknowledged that the Eastern Cluster is, in principal, an appropriate location for tall buildings in the City. They concluded that the proposed tower would not impact on the London Views Management Framework but raised concerns in relation to the settings of both the Lloyd's Building (grade I) and the Tower of London World Heritage Site stating:

*"In this case we have identified an impact on the setting of both the Lloyd's Building and the Tower of London and the contribution that a clear sky makes to the appreciation of their significance. Our main concern is the relationship with the Tower of London WHS, as the Lime Street Tower will be seen from within the Inner Ward.*

*English Heritage and Historic Royal Palaces acknowledge that the City's Eastern Cluster can already be seen beyond the walls of the Tower and in particular above the roofline of the Chapel Royal of St Peter ad Vincula. However, it is our view that the Lime Street Tower, by adding additional bulk and scale to the consented tower at Nos. 22-24 Bishopsgate, will cause an additional degree of harm to the setting of the Tower. There is a concern that from some angles the appearance of a cluster of separate towers will actually read as one merged composition of tall development. This harm may be exacerbated in future as the Eastern Cluster expands and develops unless particular care is taken."*

19. CABE/Design Council reviewed the scheme and supported the proposals commenting:

*"We think it could make a valuable addition to the City, both through its contribution to London's skyline and to the City's historic network of routes and spaces. We think the site strategy proposed is a logical one. The case for the building's 'oneness' of form and expression is well argued, producing a potentially elegant profile that could work well alongside its neighbours."*

They further commented that:

*"We note English Heritage views concerning the cumulative impact of this and other buildings in the Eastern Cluster on views from within the Inner Ward of the Tower of London, but we do not share this concern."*

However, CABE/Design Council did comment that the design of the public realm, the differentiation between the office and plant room levels and the "crank" in the facade on Leadenhall Street needed further thought and also raised concerns in relation to environmental (sustainability) targets not being fully met.

20. Historic Royal Palaces (HRP) have not formally commented. However, the applicants held a pre-application meeting with HRP on 9 August 2012.
21. No comments were received from the neighbouring London boroughs.
22. The Mayor of London stated that the proposed development, in terms of its use, design quality and potential impacts on strategic views, the Tower of London World Heritage Site and the setting of nearby listed buildings, is strongly supported in relation to the policies of the London Plan. However, he considered that further information was required in relation to how the development would provide inclusive design and would satisfy the energy policies of the London Plan. There were also a number of transport related matters that need to be resolved.

These issues are to be dealt with through condition or as part of the provisions of the Unilateral Undertaking under Section 106 of the Town and Country Planning Act 1990.

Should your committee be minded to grant planning permission, the application will be referred back to the Mayor under Article 5 of the Town & Country Planning (Mayor of London) Order 2008. The Mayor will then have fourteen days to decide whether to allow the City to issue the decision.

23. Representations were received from an occupier of residential premises in Creechurch Lane/Mitre Street and, although not objecting to the development, did raise concerns in respect of views/visibility and daylight and sunlight issues. While there is no right to a specific view, the daylight and sunlight issues are addressed in the relevant section below.
24. The Church Manager, St. Helen's Church raised concerns regarding the impact of the development during construction and required confirmation that a Construction Management Plan (CMP) would be required. I have confirmed that both Demolition Management Plan and Construction Management Plan would be required by condition.

### **Policies**

25. The development plan consists of the London Plan, the saved policies of the Unitary Development Plan and the Core Strategy. The London Plan, UDP and Core Strategy policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
26. There is relevant City of London and GLA supplementary planning guidance in respect of Planning Obligations, Sustainable Design and Construction, London Views Management Framework and the City Open Spaces Strategy 2008.
27. Government Guidance is contained in the National Planning Policy Framework (NPPF).

### **Considerations**

#### **Introduction**



28. The Corporation, in determining the planning application has the following main statutory duties to perform:

To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations (Section 70 Town & Country Planning Act 1990);

To determine the application in accordance with the development plan unless other material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004);

For development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990) and;

For development within or adjoining a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area and its setting (S72 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

29. Paragraph 131 of the NPPF advises, "In determining planning applications, local planning authorities should take account of:

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

30. The NPPF states at paragraph 14 that "at the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking ..... For decision-taking this means: approving development proposals that accord with the development plan without delay..." It further states at Paragraph 2 that:

"Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise".

31. It states at paragraph 7 that sustainable development has an economic, social and environmental role.
32. In considering the planning application before you, account has to be taken of the environmental information including the Environmental Statement, the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees.
33. The Environmental Statement is available in the Members' Room, along with the application, drawings and the representations received in respect of the application.
34. The main issues in considering this application are:

- The extent to which the proposals comply with Government policy advice (NPPF).
- The extent to which the proposals comply with the relevant policies of the London Plan, Core Strategy and the saved policies of the Unitary Development Plan.
- The impact of the proposal on heritage assets.
- The impact on the nearby buildings and spaces, including daylight/sunlight and amenity.

### Proposed Building

#### Economic Development Issues

35. London's status as a world city is founded to a substantial degree on its concentration of international service activities and, most noticeably, by the clustering of financial and business services in the City of London.
36. The importance that is attached to the maintenance and enhancement of the City's role as one of the world's leading financial and business centres is reflected in the policies of the Core Strategy and the London Plan, particularly policies CS1 and 2.10.
37. Policy CS1 seeks to increase office floorspace, particularly *'encouraging the assembly and development of large sites, where appropriate, to meet the accommodation needs of the City's biggest occupiers'*.
38. The site is located within the Eastern Cluster where policy CS7 of the Core Strategy seeks *'significant growth in office floorspace and employment'*.
39. The building would provide high quality office accommodation to meet the demands of the City's major commercial occupiers. Using the London Plan's assumed density of 1 person per 16sq.m (NIA) the number of office workers in the new building could be 2,138 compared with 795 in the existing buildings.

#### Retail Uses

40. Saved policies SHOP2 and SHOP3 of the Unitary Development Plan 2002 seek, on redevelopment, the replacement of existing retail uses and, where appropriate, the provision of new or increased retail facilities particularly where the site is close to a shopping centre. In this case the proposal site is located adjacent to the Leadenhall Market Principal Shopping Centre.
41. The street level shop (Class A1) unit would be located on the north (Leadenhall Street) elevation. The café (Class A3) would be on the south west frontage fronting onto Lime Street and the new open space. There would also be a new restaurant (Class A3) unit at basement level accessed by a lift and stairs from the Leadenhall Street frontage.
42. While there would be an increase in shop use (Class A1) of 38sq.m [NIA] and restaurant/café use (Class A3) of 325sq.m [NIA], there would be an overall reduction in the total retail floorspace of 75sq.m [NIA] which would be contrary to policy. However, the reduction would be in not replacing a Financial and Professional Service (Class A2) use which generally provide less activity at street level. The loss would be mitigated further by the provision of a new open space which would be of a wider public benefit.

### Open Space

43. The proposed new open space/pocket park/square would remain private land with all installations to be maintained by the land owners.

### Design

44. The proposals will have a significant visual impact in terms of design and townscape. Both within the immediate vicinity and the wider area.

### Bulk and Height

45. The proposed building comprises of a ground plus 38 storey tower rising to a height of 206m AOD. The site is located on the southern side of the “Eastern Cluster” of existing and consented tall buildings.

46. The Core Strategy identifies the Eastern Cluster as generally an appropriate location for tall buildings. In particular Policy CS7 (3) (Eastern Cluster) seeks:

*“To ensure that the Eastern Cluster can accommodate a significant growth in office floorspace and employment, while balancing the accommodation of tall buildings, transport, public realm and security and spread the benefits to the surrounding areas in the City, by :*

*3. Delivering tall buildings on appropriate sites that enhance the overall appearance of the cluster on the skyline and the relationship with the space around them at ground level, while adhering to the principles of sustainable design, conservation of heritage assets and their settings and protected views.”*

47. Furthermore, Policy CS14 (Tall Buildings) of the Core Strategy seeks :

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

*1. Permitting tall buildings on suitable sites within the City’s Eastern Cluster”*

48. From all viewpoints, immediate and London wide, the tower will relate satisfactorily to the established “Eastern Cluster” of tall buildings. Verified montages have been submitted which show the tower in the context of existing and consented tall buildings. From this assessment, the tower would appear as an integral part of the cluster, relating comfortably to existing and consented nearby towers and would enhance the sense of visual compactness of the cluster.
49. The height of the building at 206m AOD would be lower than the tall building under construction at 122 Leadenhall Street which, in turn, would be lower than the Pinnacle if completed. This will consolidate the Eastern Cluster’s distinctive profile with buildings gradually increasing upwards in height from the periphery of the cluster towards the consented Pinnacle scheme. This diminishing hierarchy of height is reinforced by the more modest height of 51 Lime Street to the immediate south of the site. The visual contribution of the tower to the profile of the Eastern cluster will be particularly apparent from key central London views such as Tower Bridge and key river views including Hungerford and Waterloo Bridges and the South Bank.

50. One of the factors in the design of the building is views of St Paul's Cathedral from Ludgate Hill and Fleet Street. In order that the tower does not breach the silhouette of the dome, upper drum and peristyle of the Cathedral the entire north elevation of the tower is raked back above the 12<sup>th</sup> storey (63m AOD) so that it is entirely concealed from view behind the Cathedral in the views from Ludgate Hill and Fleet Street. The impact of the proposal on these views has been tested through verified modelling and at no point will the tower be visible in views from Fleet Street and Ludgate Hill.

Architectural approach

51. The building is a crystalline glazed tower with angled triangular facets, partly as a response to the need for the facade to step back on the north elevation to avoid breaching the silhouette of St Paul's Cathedral from Ludgate Hill and Fleet Street. The facades would have triple glazed facades with anodised aluminium transoms and mullions. The design approach is considered vibrant and dynamic when viewed from the immediate area and from more distant views.
52. The angled form is considered to be an appropriate contrast to the distinctive pronounced modelling and articulation of the Lloyds Building, the curved cylindrical form of 30 St Mary Axe, the triangular wedge shaped 122 Leadenhall Street and the concave design of 51 Lime Street. In this respect the architectural form will contribute positively to the dynamic and varied qualities of the cluster of tall buildings.
53. The angled roof plane would be highly visible in surrounding views of London wide importance (particularly from the south and east). The angled roof is clad in closely spaced, horizontal natural finished aluminium louvres which will conceal the plant within from view and appear as a uniform treatment to the angled roof of the building. The southern angled roof is clad in photovoltaic panels which will relate satisfactorily with the glazed facades of the building.
54. Canopies at lower levels on Leadenhall Street and Lime Street are needed for wind mitigation. These canopies have been incorporated into the design of the building and reflect the angled design of the facades.
55. The design of the ground floor relates satisfactorily with the public realm. The office reception, lift lobby and retail units will have 7m high clear glazed facades enabling views into the building. A condition requiring details of this glazing is recommended to ensure that maximum transparency is achieved.
56. The upper storeys of the tower accommodate the plant which is entirely concealed from view within the building and its louvred angled roof. Telescopic, pivoting Building Maintenance Units are enclosed within the angled roof and concealed from view when not in use. Recessed guide rails for the maintenance units are incorporated in the metal corner cladding on the edges of the angled facade. Further details of the cleaning and maintenance equipment will be required by condition.
57. The base of the building on Billiter Street is designed with a folded angled facade similar to the main tower and would appear as a pavilion appropriate in scale to the adjoining building at 38 Leadenhall Street. This section of the building would house mechanical plant which would be concealed by horizontal metal panels and louvres.

58. The proposal relates satisfactorily to the existing building on the corner of Billiter Street (38 Leadenhall Street). At this point the tower would have a lower section with an angled roof to create a transition in scale between the tower and the 38 Leadenhall Street.
59. The scheme makes provision to reuse four carved stone allegorical relief panels representing Air, Sea, Fire and Land (carved by James Woodford) which were re-located at the rear of 26 Leadenhall Street following the demolition of the 1957 Lloyd's building. The panels would be relocated on the southern elevation of the new building on the return from Billiter Street. The panels would add visual interest to this elevation which will be especially beneficial as there are no active uses on this part of the frontage. As these stone panels are owned by 51 Lime Street the work will require their agreement and this will be included in the section 106 agreement.

#### Public Realm

60. The building's footprint is angled to provide a new triangular open space on the western edge of the site. This new space will result in a significant enhancement to the townscape, facilitating pedestrian movement on the south east/north west axis, improving the relationship between existing south facade and the Willis Lloyd's Building and as opening new views of the east elevation of the Grade I listed Lloyd's Building. The café facing on to this area will provide a focal point and vibrancy to ensure a successful open space.
61. The location of the main core and back of house accommodation on the southern elevation results in an inactive frontage. This elevation fronts a public way through the neighbouring site but the desirability of concentrating the active uses on the Leadenhall Street and the new open space justifies placing the back of house facilities on this elevation. However, there will be views of activity in the lift lobby and the stone carvings will provide visual interest to this elevation.

#### Setting of surrounding Conservation Areas

62. Although not in a Conservation Area, the proposal will affect views within and of a number of surrounding Conservation Areas (listed below). The impact of the proposals on these views has been assessed and the setting of the Conservation Areas and designated and undesignated heritage assets within these Areas is not considered to be harmed.

#### Bank

63. The site is located to the east of the Bank Conservation Area. The proposal will have particularly significant impact on two key views within the Conservation Area, firstly from Bank Junction and secondly in views eastwards along Cornhill. In terms of the impact on the Bank Junction, the proposed tower will appear as a prominent tower to the right of the Royal Exchange and visible immediately behind the Lloyd's Building. The tower would be seen as part of the consented towers of the Eastern Cluster including 122 Leadenhall Street, the Pinnacle and to a lesser degree 100 Bishopsgate. In this respect the proposed tower will be an integral part of the dynamic backdrop of towers behind Royal Exchange.

64. Similarly, the tower will appear as a prominent skyline feature in the view eastwards along Cornhill, immediately behind the Lloyds Building. However, the appearance of the Eastern Cluster towers, such as 122 Leadenhall Street, 51 Lime Street and the Lloyds building, are distinctive features in this view and the proposal will sit comfortably within this backdrop and is not considered to harm this view.

#### Lloyd's Avenue

65. The upper part of the tower will be visible from the east side of Lloyd's Avenue as a backdrop to classical stone facades. However, the building would be seen alongside the 122 Leadenhall Street and the Pinnacle. In this respect it would relate satisfactorily with the "Eastern Cluster" of tall buildings in this view and is not considered to harm the character and appearance of the Lloyd's Avenue Conservation Area.

#### Leadenhall Market

66. The proposal is to the east of the Leadenhall Market Conservation Area. Its impact on views from this Conservation Area is limited especially as it will be partly obscured from view by the Lloyds Building. The scheme is not considered to harm the character and appearance of the Leadenhall Market Conservation Area.

#### St Helen's Place

67. The proposed tower is located a significant distance to the south of this Conservation Area. The main focus of this Conservation Area is the formal townscape composition of St Helen's Place itself and the Bishopsgate street frontage. The proposed tower will have a negligible impact on these views. The tower will be visible in the backdrop of views southwards along St Mary Axe, however the 1980's commercial frontages on this street are unexceptional and of secondary importance to the Conservation Area's character. The scheme is not considered to harm the character and appearance of the St Helen's Place Conservation Area.

#### Bishopsgate

68. The proposal would have a visual impact on the views southwards along Bishopsgate where (depending on the rate of implementation of existing consents) it will be seen integrated within the cluster of tall buildings. In particular, the Heron Tower and Heron Plaza development will conceal the proposed tower in these views. The proposal will not harm the character and appearance of the Bishopsgate Conservation Area.

#### Setting of Listed Buildings

69. The proposal will affect the setting of a number of surrounding listed buildings. Policy CS12 (1) (Historic Environment) of the City's Core Strategy seeks to safeguard "*the City's listed buildings and their settings*"

#### The Lloyd's Building

70. The building, designed in 1978 by Richard Rogers Partnership, is listed Grade I and is of outstanding special interest as a seminal late C20th building

demonstrating architectural innovation by one of Britain's most significant modern architects. The building's dynamic design, combined with its height, means that it makes a prominent contribution to the townscape.

71. The proposals will conceal more of the upper part of the Lloyd's building in views from the eastern end of Leadenhall Street. However, these diminished views will be offset by improved views of the curved staircase corner feature of the building in closer views westwards on Leadenhall Street. In addition, the angled west elevation of the tower will create a triangular plaza which will provide new views of the east elevation of the Lloyd's Building when approached from the south east.
72. The design of the tower as a smooth crystalline form would contrast with the highly modelled and articulated Lloyd's Building which would harm the setting of the Lloyd's Building.

#### St. Andrew Undershaft Church

73. The tower will be a striking and dominant element as a neighbour and backdrop to this Grade I listed church. The scheme will have a considerable impact on the setting of the church. However, the relationship of modestly scaled listed buildings and churches when seen against the backdrop of the City's prominent tall buildings is characteristic of this part of the City. This contrast in scale already exists in its relationship with 30 St Mary Axe, 122 Leadenhall Street and the Aviva Tower. In addition, in views southwards along St Mary Axe, the church is already viewed against the backdrop of 51 Lime Street. Given the prevailing character of the area, the setting of St. Andrew Undershaft will not be worsened.
74. The proposal will result in diminished light levels entering the church but this would not harm the appreciation of the church's interior or the special architectural or historical interest of the interior and the monuments within.

#### Other Listed Buildings

75. There are other listed buildings impacted by the Eastern Cluster which is a distinctive characteristic in this part of the City. The proposed tower would form part of this backdrop of tall buildings and will not harm the setting of the listed buildings.

#### Setting of the Tower of London World Heritage Site

76. The proposal will impact on views of and the setting of the Tower of London World Heritage Site. The City of London Core Strategy Policy CS12 (5) (Historic Environment) seeks to "Preserve and, where appropriate, to enhance the Outstanding Universal Value, architectural and historical significance, authenticity and integrity of the Tower of London World Heritage Site and its local setting".
77. The Tower of London World Heritage Site Management Plan was published by Historic Royal Palaces in June 2007 and is an important material consideration in assessing applications which affect the World Heritage Site and its setting.
78. The Tower of London Local Setting Study was completed in August 2010 on behalf of the Tower of London World Heritage Site Consultative Committee of which the City is a member. The document identifies key views to and from the

Tower, and important approaches to the World Heritage Site. The document is a material consideration in planning assessments of the impact of proposed schemes on the setting of the World Heritage Site.

79. There are six relevant views set out in the Local Setting Study which include the Byward Tower entrance, Inner Ward and the North Wall walkway. The three remaining views (Tower Bridge North bastion, City Hall (25A) and London Bridge South Side) duplicate the London Views Management Framework and are dealt with in the relevant section below.
80. In the Byward Tower entrance, Inner Ward and the North Wall walkway views, the proposed tower would appear as an integral part of the compact Eastern Cluster of tall buildings, which today is a distinctive and accepted townscape feature in the wider setting of the World Heritage Site. In this respect, the proposed tower would not appear as an incongruous isolated feature on the skyline and would not harm the Outstanding Universal Value, special architectural and historic significance, authenticity, integrity or setting of the Tower of London World Heritage Site.

#### London Views Management Framework

81. Policy CS13(1) of the City's Core Strategy seeks to implement the London View Management Framework SPG to manage designated views of strategically important landmarks (St Paul's Cathedral and the Tower of London), river prospects, townscape views and linear views. The site falls outside any of the Protected Vistas but will have an effect on a number of the views identified in the London Views Management Framework. Verified montages have been submitted with the application to provide a thorough assessment of the proposal's wider impact:

#### **15B.1, 15B.2 and 17.1: Waterloo Bridge and Hungerford Footbridge**

82. In these views, the tower would appear on the southern edge of the Cluster and would not harm the setting of St Paul's Cathedral.

#### **25A.1, 25A.2 and 25A.3 City Hall: Queen's Walk**

83. From these assessment points the proposal would relate satisfactorily with the Eastern Cluster of tall buildings. The proposed tower would appear sufficiently separated from the Tower of London World Heritage Site so as not to harm its setting.

#### **10A.1 Tower Bridge**

84. As in the case of the City Hall views, the proposal will sit comfortably within and consolidate the profile and compactness of the Eastern Cluster and would be sufficiently distant from the World Heritage Site not to harm its setting.

#### **Consultation Response**

#### English Heritage

85. English Heritage is concerned about the impact of the proposed tower on the setting of the Tower of London World Heritage Site. This concern is focussed on the view from the Inner Ward and harm to this view resulting from further bulk and scale to the consented towers of the Eastern Cluster.



86. It is considered that the existing and emerging consented towers in this view will develop into a distinctive backdrop in the views from the Inner Ward. Although the new tower will result in additional bulk to the developing towers of the Eastern cluster and will appear as a merged composition of towers, this is not considered harmful in the view from the Inner Ward. Indeed it is considered that the new building would consolidate the compactness of the silhouette of the Eastern Cluster. In this respect the tower would not appear as an isolated feature on the skyline in the setting of the World Heritage Site or diminish the gradual transition downwards of scale.

Design Council/CABE

87. CABE are broadly supportive of the design of the building and the provision of the pocket park on the west elevation but expressed concerns in respect of the design of the public realm, the differentiation between the office and plant room levels and the “crank” in the facade on Leadenhall Street. They also raised concerns in relation to environmental (sustainability) targets not being fully met.
88. CABE suggested that it may be desirable to emphasize the difference between the plant and office storeys in the elevational design and that this could be achieved without compromising the integrity of the building. I do not agree with this suggestion given that the design integrity of the tower is dependent on angled glazed facades creating a crystalline shape and that changes in the design of the glazed angled planes will undermine this strong sense of design integrity of the building. The acknowledgement of plant areas at the top of the building is already expressed by the louvred angled plane of the roof which is considered to be an adequate and appropriate feature of the design.
89. CABE suggested that the lower level “crank” (the junction between the main elevation and the lower levels along Leadenhall Street) in the facade is unresolved. This view is not supported as it is considered that the vertical nature of the “crank” complements the verticality of the tower as well as lining up with the eastern fold of the tower.
90. They expressed concern in relation to the design of the pocket park/public realm. The details of the public realm are only schematic and a condition is included requiring details of the hard and soft landscaping together with security measures to be submitted for approval.
91. With regard to sustainability targets, the proposed building would achieve a “Very Good” BREEAM rating with a 21% reduction in carbon dioxide emissions compared to a Building Regulations (2010) compliant building. A detailed assessment of the carbon dioxide emissions of the currently proposed scheme and the incorporation of measures to further reduce carbon dioxide emissions is required by condition and dealt with under Sustainability and Energy below.

Aviation

92. The building exceeds the height threshold for consultation with London City Airport. Any views they express will be reported at your meeting. However, as the site is in the Eastern Cluster of high buildings where there are other equally high structures it is not expected that there would be any impact on aviation. The necessary warning lights will need to be installed.

### Archaeology

93. The site is in an area of archaeological potential, close to the centre of the Roman town, the Roman basilica/forum and other buildings. There has been some archaeological excavation on part of the site and in the surrounding area. Significant and well preserved Roman remains have been recorded including high status Roman buildings with decorated plaster and tessellated floors. Medieval remains recorded include buildings and evidence for bell making.
94. A Historic Environment Assessment has been submitted with the planning application.
95. There is high archaeological potential in the north western part of the site where the existing buildings has a single basement. Elsewhere, the buildings have double basements and it is considered that there is low or no archaeological potential in these areas.
96. Archaeological evaluation is required to provide additional information on the date, character and nature of archaeological survival, to supplement the findings of the assessment and to design an appropriate mitigation strategy. The evaluation results would be used to inform the basement and foundation design in the north-western part of the site, where there is higher potential for remains to survive. The evaluation results may require redesign of the basement and foundations in this area.
97. Conditions are recommended to cover archaeological evaluation, a programme of archaeological work and foundation design.

### Daylight and Sunlight

98. A report has been submitted analysing the effect of the proposal on daylight and sunlight to residential units at Creechurch Lane and Mitre Street (42 units) and two ancillary residential units (Directors flats) on the 8<sup>th</sup> and 9<sup>th</sup> floors of 22 Billiter Street.
99. This analysis has been carried out in accordance with the Building Research Establishment (BRE) guidelines "Site Layout Planning for Daylight and Sunlight". The guidelines are advisory rather than mandatory and need to be interpreted flexibly, taking into account other factors which might also affect the site.
100. The UDP states, "Commercial pressures can cause many City sites to be the subject of redevelopment proposals to increase floorspace and bulk. The quality and quantity of daylight and sunlight reaching nearby existing buildings, streets and open space or future occupiers of new buildings may be impaired if new building are larger than those they replace. Therefore it is important that proposed large redevelopments are well designed to make good use of available daylight and sunlight, to prevent avoidable losses of existing daylight and sunlight and to ensure that appropriate levels consistent with a city centre context remain".
101. Policy ENV 35 of the Unitary Development Plan (UDP) is "To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to levels which would be contrary to the Building Research Establishment's guidelines".

102. The BRE Guidelines provide two main approaches to the calculation of daylight; (1) Vertical Sky Component (VSC) and (2) Average Daylight Factor (ADF). Daylighting consultants have advised that ADF is the more appropriate method as it is more detailed and considers not only the amount of sky visibility, but also the window size, room size and room use, i.e. it assesses the level of light within the room.
103. When considering VSC the guidance states that if a reduction is below the minimum recommended figure and the reduction is greater than 20% of existing figure the difference in daylight (or sunlight) would be noticeable.
104. Daylight and sunlight levels should be assessed for the main habitable rooms of neighbouring residential properties. Habitable rooms in residential properties are defined as kitchens, living rooms and dining rooms. Bedrooms are considered less important as they are mainly occupied at night time.

#### Creechurch Lane/Mitre Street

##### Daylight

105. Only three of the assessed windows would have a reduction in daylight and that reduction is within the parameters in the BRE guidelines where the loss would not be noticeable.

##### Sunlight

106. Only three of the assessed windows would be have a reduction in sunlight and these would all meet the BRE Guidelines criteria, where the reduction would not be noticeable.

#### 22 Billiter Street

##### Daylight

107. The assessment results indicate that the presence of tall buildings to the west of this building, including 51 Lime Street and 122 Leadenhall Street, result in low existing values of daylight. The proposed development would reduce the daylight levels by between 50% and 60%, resulting in a loss that would be noticeable to kitchen windows and secondary living room windows but the loss is considered acceptable as it would not affect light received via the main windows to the living rooms which face north.

##### Sunlight

108. The windows on the north and west elevation do not receive sunlight at present due to existing buildings and this position will be unchanged. There are south facing bedroom windows but these have not been assessed as the BRE guidance on sunlight relates to living rooms only.
109. Whilst there would be a reduction in daylight and sunlight to these properties, they are ancillary units and not permanently occupied and the impact is not considered unacceptable in this urban context.

#### Representations

110. Representations were received from the occupier of flat 2, 4-8 Creechurch Lane in respect of the impact of the proposed building on the current daylight and sunlight enjoyed by the property.
111. The property is approximately 120m from the site. It has windows facing west over a courtyard and south over the lower roof of St Katherine Cree Church.
112. The assessment shows that these windows have low existing values for VSC, Annual Probable Sunlight Hours and Winter Probable Sunlight Hours and that these values would not be significantly changed by the proposed development.
113. It is concluded that there would be no significant effect on daylight and sunlight.

#### Sustainability and Energy

114. The building would incorporate energy efficiency measures such as an enhanced thermal envelope, high efficiency glazing, enhanced air tightness, passive solar gain, heat recovery and energy efficient services. These measures would create up to 20% carbon dioxide emissions savings when compared to a Building Regulations (2010) compliant building.
115. The assessment of the use of decentralised energy networks concludes that the connection of the development into the Citigen district heating network is currently not possible but the opportunity for a connection into a future district heating network, should this become available, would be provided. A site wide combined heat and power system was also concluded not to be feasible.
116. The assessment of renewable technologies concluded that there is a suitable area for the installation of photovoltaic panels where they would not detract from the architectural appearance. A panel area of approximately 200sq.m is proposed, which would achieve between 1.2% and 1.6% of carbon dioxide emissions savings.
117. The overall carbon dioxide emissions savings are stated as 21%, which is less than the London Plan target of 25%.
118. The design does not currently achieve the energy requirements for a BREEAM “excellent” rating and the planning stage BREEAM rating is therefore stated as “very good”. A detailed assessment of the carbon dioxide emissions of the measures currently proposed and the incorporation of additional measures to reduce the carbon dioxide emissions by at least 25% compared to a Building Regulations compliant building and achieve a BREEAM “excellent” rating is required by condition.
119. Measures to improve the sustainability and climate change adaptation of the development include water saving fittings and a rainwater harvesting system. There would be no suitable areas for the installation of green roofs or other urban greening.

#### Wind

120. Wind tunnel testing has been carried out and as a result alterations were made to the building design including:
  - A triangular shape canopy on the north side to Leadenhall Street;
  - A triangular shape canopy on the south-west side to Lime Street;

- An L-shape canopy in the passage on the south side; and
  - Four trees in the new square.
121. The test results showed that overall wind conditions would remain similar to existing, in the “Standing” or “Strolling” range, and would be acceptable for the intended uses with the mitigation measures in place.

#### Servicing and Parking

122. The waste storage and collection facilities have been agreed with the Waste & Amenity Planning Manager.
123. The proposed servicing strategy for the development ensures that servicing will not take place on the public highway. A loading/unloading area is provided on the ground floor, which provides 4 vehicle bays; two bays that can accommodate 8m rigid vehicles, one bay that can accommodate 6m rigid vehicles and one skip compactor bay which can also be used by 6m rigid vehicles when not in use by the skip vehicle. The servicing area has a clear headroom height of 5 metres, is accessed from Billiter Street and is designed such that all vehicles can enter and exit in a forward gear, which complies with City of London policy.
124. The service area would be adequate for the development but a Servicing Management Plan (SMP) will need to be provided to ensure that deliveries are spread throughout the day to avoid peaks when the service yard would otherwise become congested. This would be secured through condition.
125. The development is to be “car free” other than the provision of a single disabled accessible parking bay within the Billiter Street service area. This is in accordance with UDP policy to discourage commuting by cars and policy 6.13 of the London Plan which requires that developments should provide at least one on or off street parking bay for disabled users even if no general parking is provided.
126. It is proposed to provide 18 motorcycle parking spaces within the basement of the development. These spaces will be accessed via two lifts, shared with access to the cycle storage areas. Motorcyclists will access these lifts from Billiter Street through the loading bay. There is no policy requirement to provide these spaces in a car free development.
127. For the office element of the development 363 cycle parking spaces are proposed in line with the London Plan requirements of one space per 150sq.m (GEA) of office space. This exceeds the UDP requirement of 218 spaces (one space per 250sq.m).
128. Cycle parking would be sited within the demise of each retail unit (one per unit) with an additional six on-street cycle parking spaces related to the retail units proposed at the south-east corner of the site. This provision of is in line with the London Plan requirements of one space per 125sq.m (GEA) of retail space. The public would have access to the on-street spaces.
129. The land to be used for on-street cycle parking is not public highway and no stopping up would be required. The cycle racks would be maintained by the land owner.

130. The site is identified as being located in an area with a Public Transport Accessibility Level (PTAL) rating of 6b. This is the highest level of accessibility and rated as “Excellent”. There are eight London Underground lines and three National Rail stations within 960m walking distance. Docklands Light Railway services are available from Bank station 530m walk away and there are 27 bus routes available within 620m walking distance.
131. The application includes a Travel Plan Statement. However, interim and full Travel Plans will be required (prior to occupation and within six months of first occupation respectively) to ensure that the tenants are promoting and encouraging sustainable travel methods. This would be secured through condition.

#### Security

132. The City of London expects all security measures to be accommodated within the demise of the applicant’s land ownership and not on public highway.
133. There are two main areas where security concerns need to be addressed, the new area of open space and the main facade to Leadenhall Street.
134. The proposal for the new open space area would incorporate a series of fixed landscape elements to create suitable protection including:
- Low level masonry clad bollards
  - Low level masonry clad benches
  - A low level masonry clad planter
  - Standard height metal bollards
135. Provided that these measures are located on private land this would be acceptable.
136. The applicants have indicated three options for security measures, the third of which is unacceptable as it proposes bollards on the edge of kerb on Leadenhall Street and could cause unacceptable congestion.
- Option 2 shows bollards along the back edge of the footway, up against the building on its Leadenhall Street frontage. If the bollards were on private land this option would be acceptable. However, if the land were shown to be public highway this option would be unacceptable.
  - Option 1 shows bollards/security measures internal to the building which would be the City’s preferred option and in line with policy.
137. Where specific security measures are not provided externally the facade would be designed to withstand attack.
138. The detailed design and specification of all security measures including those in the open space would be subject to condition.

#### Planning Obligations

139. Under Section 106 of the Town & Country Planning Act 1990 an agreement or planning obligation can be made between parties, usually the developer and the local authority, or a unilateral undertaking can be submitted by a prospective developer:

- restricting the development or use of land in any specified way;
  - requiring specified operations or activities to be carried out in, on or under or over the land;
  - requiring the land to be used in any specified way; or
  - requiring a sum or sums to be paid to the authority on a specified date or dates or periodically.
140. Planning obligation arrangements were modified by the Community Infrastructure Levy Regulations 2010 ('the CIL Regulations'). The Regulations introduce statutory restrictions on the use of planning obligations to clarify their proper purpose, and make provision for planning obligations to work alongside any Community Infrastructure Levy ('CIL') arrangements which local planning authorities may elect to adopt.
141. Regulation 122 states that it is unlawful for a planning obligation to constitute a reason to grant planning permission when determining a planning application if the obligation does not meet all the following tests:
- necessary to make the development acceptable in planning terms;
  - directly related to the development; and
  - fairly and reasonably related in scale and kind to the development
142. The National Planning Policy Framework (March 2012) stated that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. It repeated the tests set out above and then stated that where planning obligations are being sought or revised, local planning authorities should take account of changes in market conditions over time and, wherever appropriate, be sufficiently flexible to prevent planned development being stalled. (NPPF paragraphs 203-206).

## **Mayor of London Policies**

### Mayoral Community Infrastructure Levy (CIL)

143. On 1<sup>st</sup> April 2012 the Mayor of London introduced a new statutory charge, the Mayoral Community Infrastructure Levy (CIL), in accordance with London Plan Policy 8.3. The Mayoral CIL is paid by developers to help fund strategically important infrastructure, initially focussing on Crossrail. The Mayor has set a charge of £50 per sq.m and this applies to all development over 100sq.m except social housing, education related development, health related development and development for charities for charitable purposes.

### Mayoral Planning Obligations

144. Since April 2010 the Mayor of London has sought contributions towards the cost of funding Crossrail through the negotiation of planning obligations in accordance with London Plan Policy 6.5. Mayoral planning obligations are payable by developers according to an indicative level of charges for specific uses set out in the Mayoral SPG (July 2010): offices (£137 per sq.m net gain in floorspace), retail (£88) and hotels (£60) provided there is a net gain of 500sq.m for that use. There is an initial reduction of 20% in the Mayoral planning obligation payable for developments that are commenced by 31<sup>st</sup> March 2013.

145. The Mayor of London has stated in his Mayoral CIL Charging Schedule (April 2012) that he will not 'double charge' developments that are liable for both Mayoral CIL and Mayoral planning obligations payments for Crossrail. His approach is to treat any Mayoral CIL payment as a credit towards any Mayor planning obligation liability. Therefore the Mayoral planning obligation liability can be reduced by the Mayoral CIL.
146. In this case the Mayoral CIL is £1,879,815. The full Mayoral planning obligation would be £4,774,860 but this is reduced to £2,895,045 after deduction of the Mayoral CIL. The full Mayoral planning obligation is also subject to a 20% discount if the development is commenced before 31st March 2013.
147. These contributions towards the funding of Crossrail will be collected by the City Corporation. Under the CIL regulations the City Corporation is able to retain 4% of the Mayoral CIL income as an administration fee; the remainder will be forwarded to the Mayor of London. The whole of the Mayoral planning obligation income received will be forwarded to the Mayor. However, the developer will also be liable to pay an additional £3,500 Mayoral planning obligation administration and monitoring charge to the City Corporation. The total contributions due in accordance with the Mayoral CIL and Mayoral planning obligation policies are summarised below:

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution £</b>	<b>Forwarded to the Mayor</b>	<b>Retained by City Corporation</b>
Mayoral Community Infrastructure Levy payable	1,879,815	1,804,622	75,193
Mayoral planning obligation net liability	2,895,045	2,895,045	Nil
Mayoral planning obligation administration and monitoring charge	3,500	Nil	3,500
<b>Total liability in accordance with the Mayor of London's policies</b>	<b>4,778,360</b>	<b>4,699,667</b>	<b>78,693</b>

#### **City of London's Planning Obligations SPG policy**

148. On 8th June 2004 the City's Supplementary Planning Guidance on Planning Obligations was adopted. This policy seeks a contribution of £70sq.m from developments over 10,000sq.m provided that there is also an increase of 2,000sq.m.
149. In this case the proposed net increase would be 38,370.6sq.m. On the basis of the figure indicated in the Supplementary Planning Guidance, the planning obligation figure would be £2,685,942. It is the City's practice that all financial



contributions should be index-linked with reference to the appropriate index from the date of the Committee resolution.

150. The applicant has agreed a breakdown which accords with the Supplementary Planning Guidance as follows:

Category	Contribution £	Percentage share %
<b>Total Contribution under City's SPG</b>	<b>2,685,942</b>	
Allowance for Monitoring of Agreement by City (1%)	26,860	
<b>Balance available for allocation</b>	<b>2,659,082</b>	<b>100</b>
<b>Proposed allocations:</b>		
Local Community and Environment	1,329,541	50
Affordable Housing	797,725	30
Transportation	398,862	15
Local Training and Skills	132,954	5
<b>Total allocation under City's SPG</b>	<b>2,659,082</b>	<b>100</b>

151. I have set out below the details that I am recommending concerning the planning obligations. All of the proposals are considered to be necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the above tests contained in the CIL Regulations and in government policy. I would also request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and the S278 as necessary.

#### **Local Community and Environmental Improvements**

152. It is inevitable that a development of the scale and intensity of the proposals will have a range of impacts in the vicinity of the site both in terms of the demolition and construction phase, and in terms of the operational phase, as referred to in this report. The contribution for Local Community Facilities and the Environment will be used to help mitigate the impact of the development by providing facilities and opportunities which may include but are not limited to education, health & welfare, church works and for the benefit of other voluntary organisations, arts & culture, leisure and recreation, childcare provision, street scene and air quality improvements. The City has identified a number of matters required to mitigate the impact of the development and which meet the planning tests and these are set out below. However, other matters requiring mitigation for the benefit of the local community are still yet to be fully scoped and it is proposed that the Local Community Facilities and Environment Contribution will be used to help mitigate such impacts also.
153. It has been proposed that the contribution be put towards the delivery of the emerging Fenchurch and Monument Area Strategy. The strategy is due to be put before committee members in February 2013 before being adopted.

154. It will include a raft of proposals to improve the function and environment of the area with particular emphasis on adapting the area to cope with future demands including increasing numbers of local workers (including those in 52-54 Lime Street) as well as increased numbers of people using the streets as a result and tube and Crossrail improvements. In summary proposals include:
- Improvements to routes to and from stations, crossings/junctions in the area (including routes to 52-54 Lime Street)
  - Reducing conflict between modes of transport and road safety improvements
  - Creating new and enhancing existing open spaces in the area including accessible seating areas Implementing measures for climate change adaptation and pollution reduction
  - Adaptations to the street environment in direct relation to the proposed changes
  - Mitigation of the local air quality in line with the City of London Air quality Strategy 2011-2015
155. Other matters requiring mitigation for the benefit of the local community are still yet to be fully scoped and it is proposed that the Local Community Facilities and Environment Contribution will be used to help mitigate such impacts also.
156. The applicant will be required to pay some of this contribution for feasibility and design studies upon demolition and the balance would be payable on or before the implementation of the planning permission.

#### **Affordable Housing**

157. The Affordable Housing contribution will be used for the purpose of off-site provision of affordable housing in suitable locations in or near to the City of London in accordance with the London Plan. The applicant will be required to pay this contribution on or before the implementation of the planning permission.

#### **Transport Improvements**

158. The proposed development will generate additional demands for movement in the form of new walk, cycle, public transport, taxi and servicing trips. Although these movements may have a destination at the development, they will have an origin elsewhere, probably outside the City. As a result, the impacts of these additional movements will be felt throughout the City, not just in the area immediately surrounding the development.
159. It is therefore proposed that the Transport Contribution should go towards projects in the City's Traffic Management Programme. The Traffic Management Programme is an emerging series of projects that seek to actively improve the functionality of City Streets in order to help them to accommodate growth in movement. This Programme has been set out in the City's adopted Local Implementation Plan (2011).
160. The Aldgate Area Enhancement Strategy is part of the Traffic Management Programme portfolio. The Aldgate Gyratory acts as a key eastern gateway to the

City. It is anticipated that a significant proportion of vehicular traffic generated by the development (servicing traffic, taxis, cycles and pedestrians) will travel through the Aldgate Gyratory.

161. It is proposed that the Transportation Contribution fund projects within the Traffic Management Programme with priority being given to the Aldgate Area Enhancement Strategy. In the event that the contribution cannot be usefully used on Aldgate the contribution should fund other transport improvement projects from the Traffic Management Programme
162. TfL have requested contributions of up to £20,000 towards the improvement of two bus stops in the vicinity of the site. The applicants are currently in negotiations with TfL with regards to this matter.
163. The applicant will be required to pay some of this contribution for feasibility and design studies upon demolition and the balance would be payable on or before the implementation of the planning permission.

#### **Local Training, Skills and Job Brokerage**

164. The Local Training, Skills and Job Brokerage contribution will be applied to the provision of training and skills initiatives, including job brokerage, in the City or City fringes. The Developer will be required to pay this contribution on or before the implementation of planning permission.

#### **Highway Reparation and other Highways obligations**

165. The cost of any reparation works required as a result of the development will be the responsibility of the Developer.
166. If required, prior to implementation and based on the City's standard draft, the developer will be obligated to enter into an agreement under Section 278 of the Highways Act 1980 to meet the cost of highway works that are necessary to meet the burden placed on the highway network by the development.

#### **Utility Connections**

167. The development will require connection to a range of utility infrastructure. Early engagement by the applicant about utilities infrastructure provision will allow for proper co-ordination and planning of all works required to install the utility infrastructure, particularly under public highway, so as to minimise disruption to highway users. A s106 covenant will therefore require the submission of draft and final programmes for ordering and completing service connections from utility providers in order that the City's comments can be taken into account, and will require that all connections are carried out in accordance with the programme. Details of the utility connection requirements of the Development including all proposed service connections, communal entry chambers, the proposed service provider and the anticipated volume of units required for the Development will also be required.

#### **Local Training, Skills and Job Brokerage Strategy (Construction)**

168. The applicant will be required to submit for approval details of the Local Training, Skills and Job Brokerage Strategy (Construction) in line with the aims of the City Corporation's Employment Charter for Construction. This Charter aims to maximise job opportunities in the City for residents of the City fringes and offer employment and training opportunities to local people wishing to

begin a career in construction. The Strategy will be submitted in two stages: one to be submitted prior to the First Preparatory Operation Date in respect of the Preparatory Operations; the second to be submitted prior to Implementation in respect of the Main Contract Works Package.

169. The Economic Development Office is able to introduce the Developer or its Contractor and Sub-Contractors to local training providers and brokerage agencies to discuss their site-specific skills needs and to identify suitable local people to fill opportunities on site. The Developer is encouraged to liaise with the Economic Development Office at the earliest stage in the development process in order that the strategy can be submitted prior to commencement.

#### **Local Procurement**

170. The developer has agreed to submit for approval a Local Procurement Strategy prior to implementation of the planning permission. The Local Procurement Strategy shall include details of: initiatives to identify local procurement opportunities relating to the construction of the development; initiatives to reach a 10% target for local procurement, from small to medium sized enterprises in the City and City fringes; the timings and arrangements for the implementation of such initiatives; and suitable mechanisms for the monitoring of the effectiveness of such initiatives e.g. a local procurement tracker can be used to capture this information.
171. The developer will be required at the 6 month stage, or half way through the project (whichever is earliest), to report to the City of London Corporation's Economic Development Office on their performance against the 10% local procurement target.
172. The Economic Development Officer is able to provide information and guidance to the Developer its Contractor and Sub-Contractors. The Developer is encouraged to liaise with the Economic Development Officer at the earliest stage in the development process in order that the strategy can be submitted prior to implementation

#### **Public Art**

173. Following the redevelopment of the neighbouring building at 51 Lime Street four carved stone allegorical relief panels representing Air, Sea, Fire and Land were installed at the rear of 26 Leadenhall Street. It is proposed that these features would to be reinstated on the building under consideration today. Prior to demolition the developer will be required to submit details of the arrangements relating to these stone panels including details of their removal and storage prior to installation and maintenance once in situ. The stone panels will be required to be placed in a location such as to be visible from publically accessible areas to enable their enjoyment as public art. The owners of the panels will need to agree this work.

#### **Monitoring and Administrative Costs**

174. A 10 year repayment period would be required where by any unallocated sums would be returned to the developer 10 years after practical completion of the development.
175. The applicant will pay the City of London's legal costs incurred in the negotiation and execution of the legal agreement and the City Planning

Officer's administration costs in respect of the same. 1% of the total contribution (secured under the City's SPG) will be allocated to the monitoring of the agreement.

176. Separate additional administration and monitoring fees will be applied in relation to the Crossrail Contribution.

### **Conclusion**

177. The proposals support the strategic objectives of the City of London to promote the City as the leading international financial and business centre.
178. The scheme provides an employment led, mixed use development which supports the economic policies of the London Plan and Core Strategy and provides an increase in high quality floorspace suitable for major occupiers and/or other users.
179. The scheme's reliance on public transport meets the transport policies in the London Plan, UDP and Core Strategy. This will have the benefits of maintaining the strength of the City in economic terms and by making effective and efficient use of the infrastructure necessary to sustain such development.
180. The development would be 'car free' other than the provision of a disabled accessible car parking space in accordance with the London Plan.
181. The scheme provides appropriate off-street servicing arrangements for the whole development.
182. The development would not harm the Outstanding Universal Value, special architectural and historic interest and setting of the Tower of London World Heritage Site.
183. The development would not detract from the setting of the nearby conservation areas or the setting of listed buildings.
184. The building's design would contribute to the richness of architecture in the City and to the area's character in general.
185. The proposed new open space/pedestrian route would be a welcome improvement to permeability through the area.

### **Background Papers**

Application Documents:

Environmental Statement Volume I by WRBC Services Limited rec'd 03.09.2012

Addendum to Environmental Statement Volume I (Daylight and Sunlight Assessment) by WRBC Services Limited rec'd 20.09.2012

Addendum to Environmental Statement Volume I (Daylight and Sunlight Assessment) by WRBC Services Limited rec'd 18.12.2012

Environmental Statement Volume II: Townscape, Heritage and Visual Impact Assessment by Miller Hare rec'd 03.09.2012

Environmental Statement Volume III: Non-Technical Summary by WRBC Services Limited rec'd 03.09.2012

Design and Access Statement by Kohn Pederson Fox Associates rec'd 03.09.2012

Planning Statement by DP9 rec'd 03.09.2012

Energy Statement by WRBC Services Limited rec'd 03.09.2012

Verified View Sequence Analysis by Cityscape rec'd 27.11.2012

Sustainability Statement by WRBC Services Limited rec'd 14.12.2012

Internal:

Memorandum            17.10.2012    City of London Markets and Consumer  
Protection, Pollution Team

External:

Letter	20.09.2012	St. Martins Property Corporation Limited
Email	09.10.2012	Thames Water
Email	10.10.2012	Environment Agency
Email	14.10.2012	Anna Davies
Letter	19.10.2012	English Heritage
Letter	18.10.2012	Natural England
Letter	07.11.2012	Greater London Authority
Letter	21.11.2012	Design Council/CABE
Letter	26.11.2012	DP9
Email	05.12.2012	St. Helen's Church
Email	11.12.2012	Anna Davies
Email	12.12.2012	Anna Davies

## **Appendix A**

### London Plan Policies

The London Plan policies which are most relevant to this application are set out below:

Policy 2.10 Enhance and promote the unique international, national and London wide roles of the Central Activities Zone (CAZ) and as a strategically important, globally-oriented financial and business services centre.

Policy 2.11 Ensure that developments proposals to increase office floorspace within CAZ include a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in the plan.

Policy 4.2 Support the management and mixed use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes.

Policy 4.3 Within the Central Activities Zone increases in office floorspace should provide for a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in this plan.

Policy 5.2 Development proposals should make the fullest contribution to minimising carbon dioxide emissions.

Policy 5.3 Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation. Major development proposals should meet the minimum standards outlined in supplementary planning guidance

Policy 5.7 Major development proposals should provide a reduction in carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.

Policy 6.3 Development proposals should ensure that impacts on transport capacity and the transport network are fully assessed.

Policy 6.5 Contributions will be sought from developments likely to add to, or create, congestion on London's rail network that Crossrail is intended to mitigate.

Policy 6.9 Developments should provide secure, integrated and accessible cycle parking facilities and provide on-site changing facilities and showers for cyclists, facilitate the Cycle Super Highways and facilitate the central London cycle hire scheme.

Policy 7.6 Buildings and structures should:

- (a) Be of the highest architectural quality;
- (b) Be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm;

- (c) Comprise details and materials that complement, not necessarily replicate, the local architectural character;
- (d) Not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings;
- (e) Incorporate best practice in resource management and climate change mitigation and adaptation;
- (f) Provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces;
- (g) Be adaptable to different activities and land uses, particularly at ground level;
- (h) Meet the principles of inclusive design;
- (i) Optimise the potential of sites.

**Policy 7.7** Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings. Applications for tall or large buildings should include an urban design analysis that demonstrates the proposal is part of a strategy that will meet the criteria set out in this policy.

**Policy 7.8** Development should identify, value, conserve, restore, re-use and incorporate heritage assets, conserve the significance of heritage assets and their settings and make provision for the protection of archaeological resources, landscapes and significant memorials.

**Policy 7.10** Development in World Heritage Sites and their settings, including any buffer zones, should conserve, promote, make sustainable use of and enhance their authenticity, integrity and significance and Outstanding Universal Value.

**Policy 7.12** New development should not harm and where possible should make a positive contribution to the characteristics and composition of the strategic views and their landmark elements identified in the London View Management Framework. It should also, where possible, preserve viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated Viewing Places.

**Policy 7.13** Development proposals should contribute to the minimisation of potential physical risks, including those arising as a result of fire, flood and related hazards.

**Policy 7.14** Implement Air Quality and Transport strategies to achieve reductions in pollutant emissions and minimise public exposure to pollution.



## **Unitary Development Plan and Core Strategy Policies**

### ***ARC1 Archaeology - evaluation and impact***

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

### ***ARC2 To preserve archaeological remains***

To require development proposals to preserve in situ, protect and safeguard important ancient monuments and important archaeological remains and their settings, and where appropriate, to require the permanent public display and/or interpretation of the monument or remains.

### ***ARC3 Recording of archaeological remains***

To ensure the proper investigation, recording of sites, and publication of the results, by an approved organisation as an integral part of a development programme where a development incorporates archaeological remains or where it is considered that preservation in situ is not appropriate.

### ***ENV8 Promote high quality open spaces***

To promote and ensure high standards in the layout, design, surface treatment and landscaping of open spaces and streets, and to seek the retention of existing surfaces and features which contribute positively to the character and appearance of the location and the City.

### ***ENV10 Protect and encourage public art***

To protect existing works of art and to seek the provision of additional works of art which enhance the City townscape.

### ***ENV28 Design of building services***

To ensure that building services are satisfactorily integrated into the architectural design of the building (with particular reference to its roof profile) and to resist installations which would adversely affect the character, appearance or amenities of the buildings or area concerned.

### ***ENV35 To protect daylight and sunlight***

To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to levels which would be contrary to the Building Research Establishment's guidelines.

### ***HOUS10 Respect residential privacy, etc***

To require where practicable that the privacy, outlook and daylighting levels of residential accommodation is respected by the form of adjacent development.

***IMP5 Separate uses to be self contained***

To require that individual uses within mixed developments are separate and self-contained.

***SHOP2 Seek replacement of retail uses***

To seek the replacement of retail uses in development schemes and to ensure that such replacements are primarily at the pedestrian level.

***SHOP3 Seek increased retail facilities***

To seek, where appropriate, the provision of new or increased retail facilities, particularly where:

- i. existing retail shop facilities are being replaced on redevelopment in accordance with policy SHOP 2;
- ii. the site is in or close to a shopping centre;
- iii. the site is close to a public transport interchange;
- iv. there is a riverside frontage.

***SHOP4 Variety in size of retail units***

To encourage retail uses in any new development scheme to provide a variety of unit sizes compatible with the character of the area in which they are situated and to encourage large retail units in suitable areas.

***TRANS15 Seek off-street servicing***

To seek, where appropriate, the provision of off-street servicing facilities in such a way as:

- i. to ensure that the location and design of vehicular access and servicing arrangements minimise the adverse effects on the adjoining highway and pay due regard to the environment and the convenience and safety of pedestrians;
- ii. to ensure that vehicular servicing and servicing access is avoided on or onto Tier 1-3 roads, except where a practical alternative cannot be provided; and
- iii. to enable vehicles to enter and leave premises in a forward direction.

***TRANS18 Resist non-residential parking***

To resist the provision of private non-residential parking in excess of the current planning standards.

***TRANS21 Seek parking for disabled people***

To seek the provision and improvement of parking arrangements for disabled people.

***TRANS22 Require cycle parking***

To provide cycle parking facilities by:

- i. requiring the provision of private parking space for cycles in development schemes;
- ii. maintaining an adequate overall number of spaces for cycles in public off-street car parks; and
- iii. providing an adequate supply of cycle parking facilities on-street.

***TRANS23 Require parking for motorcycles***

To provide parking facilities for motorcycles by:

- i. requiring the provision of private parking spaces for motorcycles in development schemes;
- ii. maintaining an adequate overall number of spaces for motorcycles in public off-street car parks and;
- iii. seeking to maintain on-street motorcycle parking at current levels, pending the approval of the Local Implementation Plan.

***UTIL6 Provision for waste collection***

To require adequate provision within all developments for the storage, presentation for collection, and removal of waste, unless exceptional circumstances make it impractical; to encourage provision to allow for the separate storage of recyclable waste where appropriate.

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

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

***CS10 Promote high quality environment***

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

***CS12 Conserve or enhance heritage assets***

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

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

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

***CS15 Creation of sustainable development***

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

***CS16 Improving transport and travel***

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

***CS17 Minimising and managing waste***

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

***CS18 Minimise flood risk***

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

***CS1 Provide additional offices***

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

***CS20 Improve retail facilities***

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

***CS21 Protect and provide housing***

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near existing residential communities, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

## **SCHEDULE**

**APPLICATION: 12/00870/FULEIA**

**52-54 Lime Street & 21-26 Leadenhall (Prudential House), 27 & 27A Leadenhall Street (Allianz Cornhill House) & 34-35 Leadenhall Street & 4-5 Billiter Street (Winterthur House) London EC3**

**Demolition of the existing buildings and erection of 2 basement levels and ground plus 38 storey tower comprising office (Class B1) use [58,196sq.m GEA] and retail (Class A1/A3) uses [1,072sq.m GEA] with ancillary access, servicing and landscaping. [Total 59,268sq.m GEA]**

## **CONDITIONS**

- 1 The development hereby permitted shall be begun before the expiration of five years from the date of this permission.  
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 (a) No development shall take place until the detailed design of all wind mitigation measures have been submitted to and approved in writing by the Local Planning Authority. These design details shall include the size and appearance of any structures, and the species of trees, planting medium and irrigation systems;  
(b) The development shall be constructed strictly in accordance with the wind mitigation measures approved under the terms of this condition and no part of the building shall be occupied until all such measures have been implemented;  
  
(c) Any trees or other external features intended to provide wind mitigation, whether on the site or on the public highway, shall be maintained by the building owner(s) for the life of the building and any trees provided for this purpose that die or are damaged shall be replaced as often as is necessary to maintain the wind mitigation unless otherwise agreed by the Local Planning Authority.  
REASON: In order to ensure that proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Core Strategy: CS10, CS14, CS15.
- 3 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site identifying efficiency and sustainability measures to be undertaken during site deconstruction of the existing buildings has been submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). The development shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved

amendments thereto as may be agreed in writing by the Local Planning Authority (in consultation with Transport for London).

REASON: To ensure that deconstruction works do not have an adverse impact on the transport network in accordance with London Plan Policy 6.14.

- 4 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site identifying efficiency and sustainability measures to be undertaken during site construction of the development has been submitted to and approved in writing by the Local Planning Authority (in consultation with Transport for London). The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority (in consultation with Transport for London).

REASON: To ensure that construction works do not have an adverse impact on the transport network in accordance with London Plan Policy 6.14.
- 5 Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects, based on the Department of Markets and Consumer Protection's Code of Deconstruction and Construction Practice, has been submitted to and approved in writing by the Local Planning Authority. A staged scheme of protective works may be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme.

REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policy of the Core Strategy: CS15.
- 6 Unless otherwise agreed in writing with the Local Planning Authority, archaeological evaluation shall be carried out in accordance with the Written Scheme of Investigation for an Archaeological Evaluation, Museum of London Archaeology, November 2012, hereby approved, in order to compile archaeological records.

REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Unitary Development Plan 2002: ARC 1.
- 7 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.

REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in

accordance with the following policies of the Unitary Development Plan:  
ARC2, ARC3

- 8 No works except demolition to basement slab level shall take place before details of the basements, foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.  
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policies of the Unitary Development Plan: ARC2, ARC3.
- 9 No impact piling shall take place until a piling method statement (detailing the type of piling to be undertaken and methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water or sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the Local Planning Authority in consultation with the relevant water or sewerage undertaker. Any piling must be undertaken in accordance with the terms of the approved piling method statement.  
REASON: The proposed works will be in close proximity to underground water and sewerage utility infrastructure. Piling has the potential to impact on local underground water and sewerage utility infrastructure.
- 10 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.  
REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policies of the Core Strategy: CS15.
- 11 The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.  
REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Core Strategy: CS3.
- 12 Before any construction works hereby permitted are begun a detailed assessment of the expected carbon dioxide emissions of the current scheme and of the incorporation of further measures to reduce the carbon dioxide emissions by at least 25% compared to the Building Regulations compliant



building shall be submitted to and approved in writing by the local planning authority.

REASON: To minimise carbon emissions and provide a sustainable development in accordance with the following policy of the Core Strategy CS15.

- 13 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;
  - (b) details of the proposed new facade(s) including typical details of the fenestration and entrances;
  - (c) details of ground floor elevations;
  - (d) details of junctions with adjoining premises;
  - (e) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level
  - (f) details of external surfaces within the site boundary including hard and soft landscaping;
  - (g) details of the dismantling of the four carved relief panels and their re-positioning on the southern elevation of the building to include a schedule of works, method statement, elevations, cross-sections and plans at scale 1:20.
- REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Unitary Development Plan and Core Strategy: ENV6, ENV8, CS3, CS10, CS12, CS15, CS19, CS20.
- 14 Details and samples of the glazing at ground and mezzanine level to the reception, retail unit and lift lobby, which shall be highly transparent, shall be submitted to and approved in writing by the local planning authority. The transparency of the approved glazing in these areas shall be maintained for the life of the building unless otherwise agreed in writing by the local planning authority.
- REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Unitary Development Plan and Core Strategy: ENV6, CS10.
- 15 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.
- REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policy of the Core Strategy: CS15.

- 16 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.  
REASON: To ensure the satisfactory servicing of the building in accordance with the following policies of the Unitary Development Plan and Core Strategy: UTIL 6, CS10, CS17.
- 17 Unless otherwise agreed in writing by the Director of Markets and Consumer Protection the level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the nearest window or facade of the nearest premises. The measurements and assessments shall be made in accordance with B.S. 4142. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation. A report demonstrating compliance with this condition must be submitted to and approved in writing by the Local Planning Authority before the plant hereby approved comes into operation.  
REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Core Strategy: CS15, CS21.
- 18 Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used demonstrating that there is adequate sound proofing to both airborne and structure borne noise transmission between the Class A use and the surrounding offices in the building. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter.  
REASON: To protect the amenities of commercial occupiers in the building in accordance with the following policy of the Core Strategy: CS15.
- 19 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority specifying the fume and kitchen extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Class A use. The details approved must be implemented before the Class A use commences and so maintained thereafter.  
REASON: In order to protect residential/commercial amenities in the building in accordance with the following policy of the Core Strategy: CS15.
- 20 In respect of the Class A1 and Class A3 units, no live or recorded music shall be played that can be heard outside the premises or within any other premises in the building.  
REASON: To safeguard the amenity of the adjoining premises and the area in general in accordance with the following policy of the Core Strategy: CS15.
- 21 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.

REASON: To ensure a satisfactory external appearance in accordance with the following policies of the Core Strategy: CS10, CS12, CS13, CS14.

- 22 No doors or gates shall open over the public highway.  
REASON: In the interests of public safety
- 23 The disabled vehicular parking bay hereby approved shall be provided on the site and shall be available at all times throughout the life of the building for the sole use of disabled visitors and employees.  
REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policies of the Unitary Development Plan and Core Strategy: TRANS21, CS16.
- 24 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 372 pedal cycles (363 for the office occupiers and 9 for the retail units). The cycle parking provided on the site must be available at all times throughout the life of the building for the sole use of the the occupiers thereof and their visitors without charge to the individual end users of the parking.  
REASON: To ensure provision is made for cycle parking and to assist in reducing demand for public cycle parking in accordance with Transport for London guidance.
- 25 Changing facilities and showers shall be provided adjacent to the office bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.  
REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Unitary Development Plan: TRANS22.
- 26 A clear unobstructed minimum headroom of 5m must be maintained for the life of the building in all the areas (including access ways) to be used for loading and unloading.  
REASON: To ensure satisfactory servicing facilities in accordance with the following policies of the Unitary Development Plan: TRANS15, UTIL6.
- 27 Except as may be approved in writing by the Local Planning Authority the loading and unloading areas must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.  
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Unitary Development Plan: TRANS15.
- 28 Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.  
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Core Strategy: CS15, CS21.

- 29 The threshold of all vehicular access points shall be at the same level as the rear of the adjoining footway.  
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Unitary Development Plan and Core Strategy: TRANS 15, ENV 8, CS10, CS16.
- 30 Prior to the occupation of any part of the building, the land between the existing building lines and the face of the proposed new building shall be brought up to street level, paved and drained in accordance with details to be submitted to and approved in writing by the Local Planning Authority and shall not be fenced or otherwise enclosed or obstructed.  
REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Unitary Development Plan and Core Strategy: ENV 8, CS10, CS16.
- 31 Provision shall be made for disabled people to obtain access to the offices and to each retail unit via their respective principal entrances without the need to negotiate steps and shall be maintained for the life of the building.  
REASON: To ensure that disabled people are able to use the building in accordance with the following policy of the Core Strategy: CS10.
- 32 A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.  
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Core Strategy CS15.
- 33 Details of a Servicing Management Plan demonstrating the arrangements for control of the arrival and departure of vehicles servicing the premises shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. The building facilities shall thereafter be operated in accordance with the approved Servicing Management Plan (or any amended Servicing Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the building.  
REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policies of the Unitary Development Plan and Core Strategy: TRANS15, CS16.
- 34 An Interim Travel Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the building hereby permitted. Within 6 months of first occupation a full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The offices in the building shall thereafter be operated in accordance with the approved Travel Plan (or any amended Travel Plan that may be approved from

time to time by the Local Planning Authority) for a minimum period of 5 years from occupation of the premises. Annual monitoring reports shall be submitted to the Local Planning Authority during the same period.

REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Core Strategy: CS16.

- 35 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission:

Drawings:

KPF/1972/P-001, KPF/1972/P-002, KPF/1972/P-003 Rev. 01, KPF/1972/P-098, KPF/1972/P-099, KPF/1972/P-100, KPF/1972/P-100M, KPF/1972/P-101, KPF/1972/P-102, KPF/1972/P-103, KPF/1972/P-104, KPF/1972/P-105, KPF/1972/P-106, KPF/1972/P-113, KPF/1972/P-114, KPF/1972/P-115, KPF/1972/P-116, KPF/1972/P-125, KPF/1972/P-126, KPF/1972/P-127, KPF/1972/P-128, KPF/1972/P-135, KPF/1972/P-136, KPF/1972/P-137, KPF/1972/P-138, KPF/1972/P-139, KPF/1972/P-140, KPF/1972/P-201, KPF/1972/P-202, KPF/1972/P-203, KPF/1972/P-204, KPF/1972/P-220.

Documents:

Written Scheme of Investigation for an Archaeological Evaluation, Museum of London Archaeology, November 2012 rec'd 06.11.2012.

REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

## INFORMATIVES

- 1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:
  - \* detailed advice in the form of statutory policies in the Core Strategy/ Unitary Development Plan, Supplementary Planning documents, and other written guidance has been made available;
  - \* a full pre application advice service has been offered; where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.
- 2 This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.

- 3 Access for people with disabilities is a material consideration in the determination of planning applications. The City of London Corporation has published design standards giving advice on access for people with disabilities and setting out the minimum standards it expects to see adopted in the City buildings. These can be obtained from the City's Access Adviser, City Planning Officer and District Surveyor. Further advice on improving access for people with disabilities can be obtained from the City's Access Adviser. Your attention is drawn to the Disability Discrimination provisions of the Equality Act 2010 to ensure that disabled people are not significantly disadvantaged.

Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.

- 4 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.

- 5 The Directorate of the Built Environment must be consulted on the following matters which require specific approval:

(a) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window cill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway). You are advised that highway projection licenses do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. In such cases please also contact the Corporate Property Officer, City Surveyor's Department.

(b) Permanent Highway Stopping-Up Orders, dedication of land for highway purposes, declaration, diversion and stopping up of City and Riverside Walkways.

(c) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.

(d) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street

within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City.

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

(f) Carriageway crossovers.

(g) Means of escape and constructional details under the Building Regulations and London Building Acts (District Surveyor).

(h) The display of any advertisement material on the premises which may be subject to the City of London Corporation's Byelaws.

- 6 The enabling of archaeological work to meet the requirements of conditions 6, 7 and 8 is the responsibility of the developer and should be regarded as an integral part of the development programme in accordance with the policies of the Unitary Development Plan and Core Strategy. This would include on site facilities, funding, fieldwork, post excavation analysis and reporting and publication of the work in accordance with recognised guidelines and codes of practice. This is to ensure adequate "preservation by record" of the archaeological resource affected by the proposed development.

- 7 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:

Noise and Dust

(a)

The construction/project management company concerned with the development must contact the Department of Markets and Consumer Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work. Restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(b)

Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise, dust etc. The code can be accessed through the City of London internet site, [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk), via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department.

(c)

Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act 1974 (which will dictate the permitted hours of work including noisy operations) and under

Section 80 of the Environmental Protection Act 1990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(e)

Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

(f)

The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NO<sub>x</sub> emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2011.

(g)

All gas Combined Heat and Power plant should be low NO<sub>x</sub> technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2011.

(h)

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

(i)

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

(j)

There is a potential for standby generators to give out dark smoke on start up and to cause noise nuisance. Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection.

Cooling Towers



(k)

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

(l)

Further information should be provided regarding the internal layout of the proposed food/catering units showing proposals for staff/customer toilet facilities, ventilation arrangements and layout of kitchen areas.

(q)

If cooking is to be proposed within the food/catering units a satisfactory system of ventilation will be required. This must satisfy the following conditions:

Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance;

The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. It cannot be assumed that ductwork will be permitted on the exterior of the building;

Additional methods of odour control may also be required. These must be submitted to the Markets and Consumer Protection Department for comment prior to installation;

Ventilation systems for extracting and dispersing any emissions and cooking smells to the external air must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent such smells and emissions adversely affecting neighbours.

8 Thames Water advises:

(1) The developer is advised to contact Thames Water Development Services (0845 850 2777) to discuss the details of the piling method statement required by a condition of this planning permission.

(2) Where a developer proposes to discharge groundwater into a public sewer, a groundwater discharge permit will be required. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing, and site remediation. Groundwater permit enquiries should be directed to Thames Water, Risk Management Team by telephoning 020 8507 4890 or by emailing [wwriskmanagement@thameswater.co.uk](mailto:wwriskmanagement@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality). Any discharge made without a permit is deemed illegal and may result in prosecution under the provision of the Water Industry Act 1991.

(3) It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or suitable sewer. It is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate, and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777.

(4) Thames Water recommends the installation of a properly maintained fat trap on all catering establishments. We further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Further information on the above is available in a leaflet 'Best Management Practices for Catering Establishments' which can be requested by telephoning 01923 898 188.

(5) The developer should incorporate with their proposals, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

(6) Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Water's pipes. The developer should take account of this minimum pressure in the design of the proposed development.

(7) A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

(8) Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

(9) The development covers a large area, currently served by combined sewers. Impact will depend upon proposed points of connection. Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.

- 9 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.
- 10 The Crime Prevention Design Advisor for the City of London Police should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.
- 11 Reason for Grant of Planning Permission  
The decision to grant this planning permission has been taken having regard to the policies in the City of London Unitary Development Plan 2002 and draft Core Strategies set out below, the London Plan, relevant government guidance and supplementary planning guidance, representations received and all other relevant material considerations. There were no objections raised by third parties to this application.

The proposals support the strategic objectives and economic policies of the London Plan and UDP and would provide an increase in high quality floorspace suitable for major occupiers and/or other users and support accommodation. The scheme's 'car free' approach and reliance on public transport meets the transport policies in the London Plan and UDP. This would have the benefits of maintaining the strength of the City in economic terms and by making effective and efficient use of the infrastructure necessary to sustain such development.

The building design would contribute to the richness of architecture in the City and to the area's character in general and would not harm the outstanding universal value, special architectural and historic interest and setting of the Tower of London World Heritage Site. The development would not detract from the setting of the nearby conservation areas or the setting of the adjacent listed buildings.

The proposed new open space/pedestrian route would be a welcome improvement to permeability through the area.

London Plan policies:

Policy 2.10 To enhance and promote the roles of the CAZ and London's financial and business services.

Policies 2.11 and 4.3 To ensure increases in office floorspace within CAZ include a mix of uses.

Policy 4.2 To support mixed use development and offices to improve London's competitiveness.

Policy 5.2 To minimise carbon dioxide emissions.

- Policy 5.3 To demonstrate that sustainable design standards are integral to the proposal.
- Policy 5.7 To provide a reduction in carbon dioxide emissions through on-site renewable energy.
- Policy 6.3 To ensure that impacts on transport are assessed.
- Policy 6.5 Contributions will be sought to mitigate congestion on rail network.
- Policy 6.9 To provide cycle facilities.
- Policy 7.6 To obtain inclusive, flexible, spaces and buildings of high architectural quality.
- Policy 7.7 To avoid tall and large buildings having a harmful impact on their surroundings.
- Policy 7.8 To protect heritage assets.
- Policy 7.10 To conserve and enhance the authenticity, integrity and significance and Outstanding Universal Value of World Heritage Sites.
- Policy 7.12 Protect strategic views, landmarks and views of World Heritage Sites in the London View Management Framework.
- Policy 7.13 Minimise potential physical risks, including fire and flood.
- Policy 7.14 To reduce emissions and minimise public exposure to pollution.

#### Unitary Development Plan and Core Strategy Policies

- ARC1 Archaeology - evaluation and impact
- ARC2 To preserve archaeological remains
- ARC3 Recording of archaeological remains
- ENV8 Promote high quality open spaces
- ENV10 Protect and encourage public art
- ENV28 Design of building services
- ENV35 To protect daylight and sunlight
- HOUS10 Respect residential privacy, etc
- IMP5 Separate uses to be self contained
- SHOP2 Seek replacement of retail uses
- SHOP3 Seek increased retail facilities
- SHOP4 Variety in size of retail units
- TRANS15 Seek off-street servicing
- TRANS18 Resist non-residential parking
- TRANS21 Seek parking for disabled people
- TRANS22 Require cycle parking
- TRANS23 Require parking for motorcycles
- UTIL6 Provision for waste collection
- CS3 Ensure security from crime/terrorism
- CS10 Promote high quality environment
- CS12 Conserve or enhance heritage assets
- CS13 Protect/enhance significant views
- CS15 Creation of sustainable development
- CS16 Improving transport and travel
- CS17 Minimising and managing waste
- CS18 Minimise flood risk

CS1 Provide additional offices

CS20 Improve retail facilities

CS21 Protect and provide housing

Newman, Tony

---

From: Anna Davies  
Sent: 11 December 2012 16:46  
To: Newman, Tony  
Subject: Re: FW: 52-54 Lime Street

Dear Mr. Newman,

I am concerned about the impact of the building on daylight and sunlight. Whilst I was provided with four photographs by Edelman, I wasn't given any figures indicating what the impact of the building would be on daylight / sunlight. Indeed, I still don't know whether the existing model for daylight and sunlight actually includes my location (I understood that there was some doubt about this, and that it was to be checked, but I still haven't heard anything), and it is incredibly hard to assess the full impact of the building from a few photographs alone.

Best regards,

Anna Davies

On 11/12/2012 11:27, Newman, Tony wrote:

Newman, Tony

---

From: Anna Davies  
Sent: 12 December 2012 23:45  
To: Newman, Tony  
Subject: Re: FW: 52-54 Lime Street  
Attachments: Flat 2, 4-8 Chreechurch Lane Visualisation.pdf

Dear Mr. Newman,

Thank you for your email and the additional information.

I've attached the pictures I was sent by Edelman.

The windows shown in the pictures (living room and kitchen) are approximately south facing and are our only source of direct sunlight. We currently receive good sunlight through these windows, but already lose direct sun to the Willis building in the afternoon. I had hoped that the proposed development would have just "skimmed" the edge of the Willis building as viewed from our windows, but as more of the proposed building will be visible than I had thought, I am concerned about the effect on daylight, as we already notice the change in daylight when the sun disappears behind the Willis building.

When our flat was visited by representatives from Edelman and Arup, it was unclear whether their daylight / sunlight model actually accounted for the south facing windows in our flat, and the fact that we are located on the first floor, behind St Katherine Cree, from which we are separated by a low roof. I was under the impression this query would be addressed and the information communicated back to me.

Whilst I was provided with some pictures, I still have not yet received any confirmation from Edelman or Arup that my flat was properly accounted for in the original model for assessment.

From what I can glean from the document you sent me, only west facing windows are mentioned in the assessment. However, the windows that will be affected in my flat are approximately south facing, and are not mentioned at all in the document. One living room and one bedroom window face west into the courtyard (we have no other windows at the property), and we would have no view of the proposed building from these two windows.

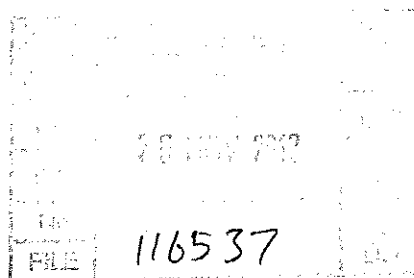
To the best of my understanding, I do not therefore believe that the Arup report reflects the actual impact on my property - it appears that the south facing windows, those most affected, were not accounted for and assessed.

Best regards,

Anna Davies

21 November 2012

Tony Newman  
City of London  
Guildhall  
PO Box 270  
London  
EC2P 2EJ



Our reference: DCC/0448

TPN

City of London: Lime Street

Your reference: 12/00870/FUEIA

**ACKNOWLEDGED** 8B 26/11/12

Dear Tony Newman,

Thank you for submitting this scheme to us; we reviewed the proposal on 14 November 2012. This is our formal response to the planning application. We welcome the chance to comment on this proposal. We think it could make a valuable addition to the City, both through its contribution to London's skyline and to the City's historic network of routes and spaces. We think the site strategy proposed is a logical one. The case for the building's 'oneness' of form and expression is well argued, producing a potentially elegant profile that could work well alongside its neighbours. The success of this approach relies on careful detailing of the complex junctions and folds across the façades, which should be conditioned appropriately. While we welcome the drama created from the cranks in the building's form, we think this is resolved more successfully at its upper levels than below on its eastern face. We feel the design of the public realm and proposed square needs further thought, including the way it complements the Aviva Plaza. We have two regrets: first that while efforts have been made to meet high environmental targets, this significant landmark will not be an exemplar. Second, we would have preferred to review this design at pre-application stage.

#### **Building form, massing and expression**

By virtue of its height and location, this building will be seen in the round from viewpoints near and far. Therefore, we think the case for achieving 'oneness' in form and expression of this glass tower is well made. We think the proposed design reveals a clear conviction about its role in the Eastern Cluster, both at the City scale and more locally in its response to its established and more recent neighbours at the heart of London's insurance district. We support its elegantly tapered form, which defers to the Grade 1-listed Lloyd's Building and St Andrew Undershaft, opening up a welcome view to the former from the east along Leadenhall Street. From the west, its sloping profile should work particularly well alongside that of 122 Leadenhall Street to frame views along Cornhill. However, we would support the City in its efforts to maintain the established shoulder height of 7-8 stories elsewhere along





Leadenhall Street. We note English Heritage views concerning the cumulative impact of this and other buildings in the Eastern Cluster on views from within the Inner Ward of the Tower of London, but we do not share this concern.

In our view, the proposed crank in the tower's form at upper level heightens the striking silhouette and identity of this building. However, it would be worth exploring how the façade could acknowledge the change in occupation between the plant levels and the offices below. We think this could be achieved without compromising the desired 'oneness' described above. We also feel that the proposed crank in the building's form at lower level, made in response to 38 Leadenhall Street, does not appear to be as well resolved as that proposed at upper level. While, in principle, we welcome the intent behind this move, we think it would be worthwhile revisiting how the massing of this particular element is articulated. There would be value in looking again at the relationship between this junction, the folding plane running to the building's north-west corner and the line of the building's canopy on Leadenhall Street; we think a more comfortable solution could result from this. Ultimately, the success of this bold design will rely on how the changes in planes are expressed, not least in those locations where the dramatic cranks create highly complex junctions. The interface between the clear and obscure glass panels, granite-clad structural columns and glass canopies will all require particular care. All of the above should be conditioned appropriately to ensure the built scheme achieves the quality of finish sought by the design team.

### **Site planning**

We think the design team's response to the challenge of accommodating a tall building of the scale proposed on this prominent site at the intersection of Leadenhall Street and Lime Street shows skillful handling and a careful consideration of context. The relationship with 38 Leadenhall Street appears to have been well resolved, the two sitting well together as a composition. The decision to locate servicing access off Billiter Street also makes good sense. We acknowledge the rationale for locating the building's core to the south of the site, leaving the majority of the building's frontage to Leadenhall Street and Lime Street free to be activated by retail uses and the building's lobby.

A key measure of success of this scheme will be how enduring a contribution it makes to the character and public life of the City. The applicant's enthusiasm for reflecting the social aspect of the insurance industry in its proposals, for example by expressly seeking independent retailers, is warmly welcomed. The degree of animation provided by these uses and the building's lobby will play a crucial role in generating activity across the surrounding public realm. Therefore, the two need to be considered alongside one another. We are pleased to note that the specification of glazing sought for the lower levels will allow unobstructed views of the activity created by these uses from the street and the new public square. This should be conditioned. We also support the intent to increase the visibility of the lifts to bring relief to the largely blank southern frontage concealing the service yard. Given that part of the City's appeal is in the charm of its tight lanes and pocket spaces, this route could work well in this regard, without resorting to cosmetic solutions to disguise these frontages. However, there would be benefit in producing a series of sequential sketches to illustrate one's journey around the building, highlighting details like the re-positioned Woodford Stones.



The gift of a new pocket square on Lime Street, as a contribution to the City's fine grain of routes and spaces, is a welcome gesture on the part of the client. The fortunes of this square will rely heavily on it achieving a clear function and character and on establishing a seamless relationship with the surrounding public realm, particularly the Aviva Plaza. However, we think the submitted design potentially limits its capacity to serve as more than an extension of the building's lobby. While we think the space could benefit from some form of delineation, we would question the way in which it has been segmented with a line of trees.

The demands placed on the public realm by the thousands of additional people working in this part of the City will be considerable. Therefore, it should be in the interests of the client, the City and those bringing forward 122 Leadenhall Street to ensure the interventions proposed are fully integrated, rather than coming forward in a piecemeal manner. We think that it would be appropriate for the City to take the lead, given its demonstrable successes on initiatives like this in recent years.

#### **Sustainability**

We welcome the design team's efforts to achieve high environmental targets for this development through a mix of passive measures and environmental technologies. However, given the nature of the scheme proposed we think there could have been an opportunity to strive for higher targets and would urge the team to continue to explore whether this might be possible. Symbolically an insurance headquarters which achieves the highest standards would be sending a message about the importance of precautionary strategies in combatting climate changes.

Thank you for consulting us and please keep us informed of the progress of the scheme. If there is any point that requires clarification, please telephone us.

Yours sincerely

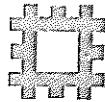


Alan Thompson  
Design Council Cabe Head of Design Review  
Email Alan.Thompson@designcouncil.org.uk  
Tel +44(0)20 7420 5231

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cc (by email only)  
William Pederson KPF  
Charles Olsen KPF  
Barnaby Collins DP9





ENGLISH HERITAGE  
LONDON OFFICE

Mr Tony Newman  
Corporation of London  
Department of Planning & Transportation  
PO Box 270  
Guildhall  
LONDON  
EC2P 2EJ

PLANNING & TRANSPORTATION		
PSDD	24 OCT 2012	PPD
TPD		DP
OM		GE
No	116206	PP
FILE		DD

Direct Dial: 020 7973 3774  
Direct Fax: 020 7973 3792

Our ref: P00192808

19 October 2012

Dear Mr Newman

52-54 LIME STREET, 21-35 LEADENHALL STREET, 4-5 BILLITER STREET,  
LONDON, EC3

Thank you for consulting English Heritage on the current application for the redevelopment of the above site. We have commented in detail at pre-application stage. As the submitted scheme has not changed substantially, our position at pre-application stage remains valid. I enclose a copy of that letter to confirm our position.

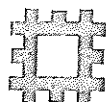
Yours sincerely

**Michael Dunn**  
Team Leader, City and North London Team  
E-mail: michael.dunn@english-heritage.org.uk



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ENGLISH HERITAGE  
LONDON OFFICE

Mr Barnaby Collins  
DP9  
100 Pall Mall  
London  
SW1Y 5NQ

1210087014061A TN

PLANNING & CONSERVATION		
PSDD	24 OCT 2012	REF
TPP		LIP
OM		SSE
PH		PP
FILE		DD

Direct Dial: 020 7973 3774  
Direct Fax: 020 7973 3792

Our ref: PA00096645  
Your ref: -  
3 September 2012

Dear Mr Collins

**Request for Pre-application Advice**

**LIME STREET TOWER, 52-54 LIME STREET, LONDON, EC2**

Thank you for consulting us on pre-application proposals at Nos. 52-54 Lime Street. We have considered the proposals and can set out English Heritage's position as follows.

The proposals are for a building at a height of 206 metres to replace the existing post-war buildings on the site, none of which are of any architectural interest. The site is not within a conservation area, and is adjacent to other consented tall buildings under construction at No. 122 Leadenhall St. and Nos. 22-24 Bishopsgate. Designated heritage assets near the site include the Lloyd's Building to the west and St Andrew's Undershaft to the north, both of which are grade I listed, and, further afield, the Tower of London World Heritage Site. The settings of the listed buildings, in particular, are characterised by post-war commercial development. Indeed, the Lloyd's Building was instrumental in creating that commercial character.

English Heritage believes that tall buildings can make a positive contribution to London when they are situated in the right place and are excellent works of architecture. A key component of ensuring successful tall buildings that enhance the overall townscape is the plan-led approach, where local authorities identify appropriate locations for tall buildings in their local development frameworks (EH/CABE Guidance on Tall Buildings 2007).

English Heritage notes that the City of London has identified the Eastern Cluster as a part of the City that can, in principle, accommodate tall buildings, and set that out as policy guidance in their current Development Framework (2011). English Heritage acknowledges that the Eastern Cluster is, in principle, an appropriate area for tall buildings in the City, and that therefore the proposed location of the Lime Street Tower within the cluster accords with policy. Its location within the Eastern Cluster and



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English Heritage is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.

English Heritage will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.



ENGLISH HERITAGE  
LONDON OFFICE

its height relative to existing and consented nearby towers mean that, in our view, it does not have a detrimental impact on the Mayor's strategic views as set out in the London View Management Framework.

However, by virtue of their size and prominence, tall buildings have a wide reaching impact on the environment, and even an appropriate location and design cannot mitigate every impact. In this case we have identified an impact on the setting of both the Lloyd's Building and the Tower of London and the contribution that a clear sky makes to the appreciation of their significance. Our main concern is the relationship with the Tower of London WHS, as the Lime Street Tower will be seen from within the Inner Ward.

English Heritage and Historic Royal Palaces acknowledge that the City's Eastern Cluster can already be seen beyond the walls of the Tower and in particular above the roofline of the Chapel Royal of St Peter ad Vincula. However, it is our view that the Lime Street Tower, by adding additional bulk and scale to the consented tower at Nos. 22-24 Bishopsgate, will cause an additional degree of harm to the setting of the Tower. There is a concern that from some angles the appearance of a cluster of separate towers will actually read as one merged composition of tall development. This harm may be exacerbated in future as the Eastern Cluster expands and develops unless particular care is taken.

Our advice at this pre-application stage is that the City of London will need to consider the additional harm being caused to the setting of the Tower and whether this can be mitigated, as part of their overall assessment of the proposals. This will need to be carefully weighed in the balance when coming to a decision.

The form of the Eastern Cluster will have an important influence on the character of the City and also the degree to which it impacts upon the setting of the Tower of London in future. Should the Lime Street Tower be given consent the relationship between it and future tall buildings will need careful consideration to ensure that the Eastern Cluster maintains a form that enhances, rather than detracts from, the skyline of London.

Yours sincerely

**Michael Dunn**

Team Leader, City and North London Team

E-mail: [michael.dunn@english-heritage.org.uk](mailto:michael.dunn@english-heritage.org.uk)



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*English Heritage will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.*

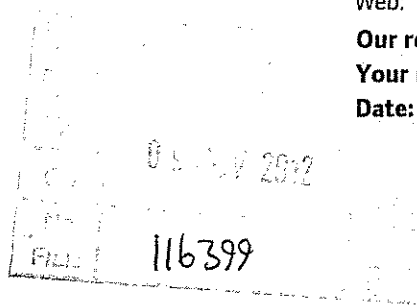
# GREATER LONDON AUTHORITY

## Development & Environment Directorate

### **Tony Newman**

Department of the Built Environment  
City of London Corporation  
PO Box 270  
Guildhall  
LONDON EC2P 2EJ

City Hall  
The Queen's Walk  
More London  
London SE1 2AA  
Switchboard: 020 7983 4000  
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Web: [www.london.gov.uk](http://www.london.gov.uk)  
**Our ref:** PDU/3015COB05  
**Your ref:** 12/00870/FULEIA  
**Date:** 7 November 2012



Dear Mr Newman,

**ACKNOWLEDGED**

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

**52-54 Lime Street and 34-35 Leadenhall Street, 27 & 27A Leadenhall Street (Allianz Cornhill House) & 4-5 Billiter Street (Winterhur House)  
Local Planning Authority Reference: 12/00870/FULEIA**

I refer to the copy of the above planning application, which was received from you on 1 October 2012. On 7 November 2012 the Mayor considered a report on this proposal, reference PDU/3015/01. 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 Mayor considers that while the application is generally acceptable in strategic planning terms, on balance the application does not yet comply with the London Plan. The reasons and the potential remedies set out in paragraph 60 of the attached report could address these deficiencies.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011. The environmental information made available to date has been taken into consideration in formulating these comments.

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 me 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 James Forrest, telephone 020 7126 4166.

Yours sincerely,



**Colin Wilson**

Senior Manager- Planning Decisions

cc John Biggs, London Assembly Constituency Member  
Nicky Gavron, Chair of London Assembly Planning Committee  
John Pierce and Ian McNally, DCLG  
Alex Williams, TfL  
Philippa Edwards, DP9, 100 Pall Mall, London SW1Y 5NQ

7 November 2012

**52-54 Lime Street & 21-26 Leadenhall, 27 & 27A Leadenhall  
Street and 34-35 Leadenhall Street and 4-5 Billiter Street**

**in the City of London**

**planning application no. 12/00870/FULEIA**

## **Conclusion**

60 London Plan policies on offices, tall buildings, views and heritage, urban and inclusive design, climate change and transport are relevant to this application. The application complies with some of these policies but not with others and on balance does not yet fully comply with the London Plan; the reasons and the potential remedies to issues of non-compliance are set out below:

- **Offices:** The principle of office-led mixed use development in this location complies with London Plan policies 2.10, 2.11, 4.2 and 4.3 and is strongly supported.
- **Tall buildings:** The principle of a tall building on this site is consistent with London Plan policy 7.7; the scheme is of a high design quality that will make a positive addition to London's skyline.
- **Strategic views:** The impact of the proposal on strategic views has been assessed in accordance with the London View Management Framework. The application complies with London Plan policies 7.11 and 7.12.
- **World Heritage Sites and listed buildings:** In order to ensure compliance with London Plan policy 7.10, the applicant should provide an explicit assessment of the impact of the proposal on the WHS, clearly linked to its Outstanding Universal Value, integrity, authenticity and significance. The application complies with London Plan policy 7.8.
- **Urban design:** The proposed development is of a high architectural quality, will increase and enhance the public realm, and complies with London Plan policies 7.1, 7.3, 7.4, 7.5, 7.6 and 7.7.
- **Inclusive design:** the entrance and lift arrangements require further explanation in order to ensure compliance with London Plan policy 7.2.
- **Climate change:** further information is required before the carbon savings can be verified. The shortfall in on-site CO2 savings should be met off-site, in order to ensure compliance with London Plan policy 5.2.
- **Transport:** cycle and car parking provision complies with London Plan policies 6.9 and 6.13. Further information and conditions are required in order to ensure compliance with London Plan policies 6.3, 6.7, 6.14 and 8.3.



Date: 18 October 2012  
Our ref: 66095  
Your ref: 12/00870/FULEIA



Tony Newman  
City of London  
PO BOX 270  
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EC2P 2EJ

Customer Services  
Hornbeam House  
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Electra Way  
Crewe  
Cheshire CW1 6GJ

**BY EMAIL ONLY**

T 0300 060 3900

Dear Mr Newman

**Planning consultation:** Demolition of the existing buildings and erection of 2 basement levels and a ground plus 38 storey tower comprising office (Class B1) use [51,196sqm GEA] and retail (Class A1/A3) uses [1,072sqm GEA] with ancillary access, servicing and landscaping. [Total 59,268sqm GEA]

**Location:** 52-54 Lime Street & 21-26 Leadenhall (Prudential House), 27 & 27A Leadenhall Street (Allianz Cornhill House) & 34-35 Leadenhall Street & 4-5 Billiter Street (Winterhur House), London, EC3

Thank you for your consultation dated 27 September 2012 and received by Natural England on 02 October 2012.

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.

Natural England's comments in relation to this application are provided in the following sections;

#### **Protected species**

We note that the development site was assessed for the potential presence of protected species on site prior to the scoping stage and none were recorded on site. Consequently, Natural England has no comments to make in relation to protected species at present.

#### **Landscape**

Natural England notes that the development is located within the setting of the Tower of London World Heritage Site and Thames Path National Trail. All proposals should complement and where possible enhance local distinctiveness and be guided by your Authority's landscape character assessment where available, and the policies protecting landscape character in your local plan or development framework.

#### **Other advice**

We would expect the Local Planning Authority (LPA) to assess and consider the other possible impacts resulting from this proposal on the following when determining this application:

- local sites (biodiversity and geodiversity)
- local landscape character
- local or national biodiversity priority habitats and species.

Natural England does not hold locally specific information relating to the above. These remain material considerations in the determination of this planning application and we recommend that you

seek further information from the appropriate bodies (which may include the local records centre, your local wildlife trust or other recording society and a local landscape characterisation document) in order to ensure the LPA has sufficient information to fully understand the impact of the proposal before it determines the application. A more comprehensive list of local groups can be found at [Wildlife and Countryside link](#).

### **Biodiversity enhancements**

This application may provide opportunities to incorporate features into the design which are beneficial to wildlife, such as the incorporation of roosting opportunities for bats or the installation of bird nest boxes. The authority should consider securing measures to enhance the biodiversity of the site from the applicant, if it is minded to grant permission for this application. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that *'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'*. Section 40(3) of the same Act also states that *'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'*.

Should the proposal be amended in a way which significantly affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again.

Yours sincerely



Bronwen Keiller  
Land Use Operations

T: 020 7606 3030

W: [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)

> -----Original Message-----

> From: BCTAdmin@thameswater.co.uk [mailto:BCTAdmin@thameswater.co.uk]

> Sent: 09 October 2012 09:02

> To: PlanningQueue

> Subject: 3rd Party Planning Application - 12/00870/FULEIA [pfCase:27706, pfTicket:5028078]

>

> Corporation of London Our DTS Ref: 33084

> Department of Planning & Transportation Your Ref: 12/00870/FULEIA

> PO Box 270

> Guildhall

> London

> EC2P 2EJ

>

> 9 October 2012

>

> Dear Sir/Madam

>

> Re: 52-54 LIME STREET & 34-35, LEADENHALL STREET, LONDON, EC3M 7NQ

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> Waste Comments

> Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions.

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> Surface Water Drainage - With regard to surface water drainage it is the responsibility of a developer to make proper provision for drainage to ground, water courses or a suitable sewer. In respect of surface water it is recommended that the applicant should ensure that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Connections are not permitted for the removal of Ground Water. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. They can be contacted on 0845 850 2777. Reason - to ensure that the surface water discharge from the site shall not be detrimental to the existing sewerage system.

>

> No impact piling shall take place until a piling method statement (detailing the type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the details of the piling method statement.

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> Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

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> A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made at <http://www.thameswater.co.uk/business/9993.htm> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

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> Water Comments

> The existing water supply infrastructure has insufficient capacity to meet the additional demands for the proposed development. Thames Water therefore recommend the following condition be imposed: Development should not be commenced until: Impact studies of the existing water supply infrastructure have been submitted to, and approved in writing by, the local planning authority (in consultation with Thames Water). The studies should determine the magnitude of any new additional capacity required in the system and a suitable connection point. Reason: To ensure that the water supply infrastructure has sufficient capacity to cope with the/this additional demand.

>

> No impact piling shall take place until a piling method statement (detailing the type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. The applicant is advised to contact Thames Water Developer Services on 0845 850 2777 to discuss the details of the piling method statement.

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> Yours faithfully

> Development Planning Department

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> Thames Water

> Development Planning

> Asset Investment Unit

> Maple Lodge

> Denham Way

> Rickmansworth

> Herts WD3 9SQ

> Tel: 01923 898072

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**Newman, Tony**

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**From:** Osior, Wioleta <Wioleta.Osior@environment-agency.gov.uk>  
**Sent:** 10 October 2012 13:57  
**To:** Newman, Tony  
**Subject:** Ref:12/00870/FULEIA

Dear Tony

**Planning Application Reference: 12/00870/FULEIA**

Thank you for your letter dated 27 September 2012. We have assessed this application and have identified flood risk as the only constraint at this site.

We are a statutory consultee on applications accompanied a EIA, but in this case we will not have any further comments to make regarding this development.

You should be using our Flood Risk Standing Advice (FRSA) to determine if we need to be consulted directly on an application regarding flood risk. This site is in Flood Zone 1 and is under a hectare. Therefore cell F5 of the consultation matrix applies and you did not need to consult us.

The main flood risk issue at this site is the management of surface water run-off and ensuring that drainage from the development does not increase flood risk either on-site or elsewhere.

We recommend the surface water management good practice advice in cell F5 is used to ensure sustainable surface water management is achieved as part of the development.

Surface water runoff rates and volumes from the site must be managed in accordance with the London Plan (July 2011) - which sets higher standards than NPPF for the control of surface water run-off. Policy 5.13 - Sustainable drainage (page 155) of the London Plan states that "development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible" in line with the drainage hierarchy.

If you have identified drainage problems at this site through your Strategic Flood Risk Assessment or Surface Water Management Plan, you may want to request a formal Flood Risk Assessment from the applicant in line with Flood Risk Assessment Guidance Note 1.

If you have any further questions about the above development or about our FRSA, please contact me.

Yours sincerely

**Wioleta Osior on behalf of Matt Arthur**

Planning Officer - North London

Environment Agency | South East | North East Thames | London

☎ 0207 091 4081 | ✉ [northlondonplanning@environment-agency.gov.uk](mailto:northlondonplanning@environment-agency.gov.uk)