

Planning & Transportation Committee – 26 October 2021

Addendum for Agenda item 5.

Planning application 21/00538/FULEIA 120 Fleet Street London EC4A 2BE

1. Letter of representation from Mr Fred Rodgers

An email has been received objecting to the proposal from Mr Fred Rodgers of Breton House, Barbican.

The email states:

“You are recommending the destruction of a modern building, one you say was constructed in 2000. According to the planning file, there was an application in August 1999 and approved that December, to vary the existing planning permission at what was then described as a “construction site for offices”. So the River Court Building was completed around 19 years ago and its replacement will be a substantially taller building but a building which will have, according to paragraph 95 of your report to Committee, an increased office GIA of 3,300sq.m over the existing building.

According to figures 2.1 and 2.2, referred to in paragraph 482, the increased embedded carbon of 754 kg CO₂/m² will not achieve a ‘payback’ for Option 3, compared to Option 1, for 24 years and for Option 3, compared to Option 2, for 17 years, although these are transposed in paragraph 482. Unfortunately, there seems to be no indication of the operational carbon emissions from the existing buildings nor the embedded carbon in them. The text accompanying figures 2.1 and 2.2 states:

The cumulative assessment over the building life shown in Figure 2-2 shows that a payback can be achieved as early as 2044 when Option-3 is compared to the Option 2 and 2049 when compared to Option-1.

Although whether or not the Circular Economy Statement should offer gratuitous opinions unrelated to the perceived expertise, such as the remainder of the above paragraph set out below, is questionable

Considering the whole life of the building this makes a strong argument for the redevelopment of the existing River Court building to offer quality and sustainable commercial development.

It seems that not until paragraph 507 is there any reference to the City of London Climate Action Strategy 2021/2027, which, of course, requires Scopes 1, 2 and 3 to be Net Zero by 2040. However, “payback” against the existing buildings won’t be achieved until 2050 at the earliest on the applicant’s figure, as Option 1 is the existing building with refurbishment adding embedded carbon.

You are recommending the demolition of an 19 year old building and an increase in carbon emissions for 25 years. All this for an additional office GIA of 3,300sq.m – a 5.7 % increase - and something that paragraph 100 completely ignores. There you claim the development “would provide 61,135sq.m GIA of office floorspace”. Where has the existing 57,835sq.m GIA gone?

Finally, there is the lack of objectivity in the Summary to your report, particularly apparent in its final paragraph. As is frequently the case, the effect on adjoining residents is never such that the harm exceeds Local Plan 2015 and/or Draft City Plan 2036 policies but relevant restraining policies are ignored in recommending development.

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

Then there is the final paragraph, which ignores the increased carbon emissions along with the noise and dust pollution of destruction and construction for several years and the harm caused to the adjoining heritage assets:

Taking all material matters into consideration, officers are of the view that the material considerations which weigh in favour of the grant of planning permission outweigh the identified conflict with the development plan the [sic] and other material considerations which weigh against the grant of planning permission. Benefits include: Rejuvenation of the Grade II Daily Express Building [this isn't listed according to the report header] as a publicly accessible cultural destination, with complementary uses and a landscaped public roof garden, an improved public realm including new pedestrian routes through the site and increased pavement widening on Fleet Street which improves pedestrian movement and comfort, increased active ground floor frontages providing flexible retail, promotion of active travel through the delivery of a prominently located Cycle House, contributions towards further public realm improvement works to St Bride Street secured through the S278 agreement, use of off-site consolidation centres to minimise vehicle movements, delivery of a Cultural Implementation Strategy which would provide details on how further consultation and delivery plans would be adopted which is secured via a S106 agreement, delivery of an exemplar new office building demonstrating high sustainability credentials, high standards or [sic] architecture and design which provides high quality internal and external environments which embed health and wellbeing through the provision of unique south facing landscaped external amenity terraces for office occupiers.*

Most of these "benefits" could be delivered in any event and certainly without *an exemplar new office building ...* etc. All this seems more like an advertising blurb than an objective opinion of a responsible professional, especially when the Summary will certainly be read by Committee Members.

The lack of objectivity is one ground for my objection to application and my request that the application should be refused. Other grounds are the lasting harm that would be done to the environment for upwards of 25 years if this development goes ahead; another is the unacceptable harm to the adjoining and nearby heritage assets; and, finally, an extra 3,300sq.m GIA is hardly likely to make a pin prick on the surface of the claimed, but unproven, need for additional office accommodation. All of which provides no justification for approving the proposal either pre or post pandemic."

Officer response: The points raised are in response to the officer's report and no new grounds of objection have been raised.

For clarification:

- There would be an increase of 3,300sq.m of office floorspace GIA across the two buildings. This calculation takes into account the current Daily Express Building which currently provides approximately 5,269sq.m of office floor space. The proposals include the change of use of this building to provide for a flexible cultural offer falling into a mix of Class E and F.1. The breakdown of uses and sq.m provided per use is detailed within the officer report. If this building were to retain wholly for office use, the uplift in office floor space would be higher. Additionally, the current building provides 983sq.m of retail floor space, the rest is office. The proposal would provide 1,926sq.m of retail at ground floor level, therefore reducing the uplift of office provision.
- The wider public benefits of the scheme are detailed and listed in the final paragraph of the Summary (Page 6 of the Officer Report) and the assessment of public benefits balancing exercise required by paragraph 202 of the NPPF is demonstrated at paragraphs 522 – 531.
- Clearly any development in the City is going to generate carbon emissions, both operational, supply chain and embodied. We are currently considering how to deal with residual carbon emissions and achieve net zero by 2040 through the Climate Action Strategy.

2. Amendment to Paragraph 482

There was an error contained within Paragraph 482, the amendments are highlighted in red:

482. The whole life-cycle carbon emission projections for the 3 options (see figures 2-1 and 2-2 copied from the submitted Circular Economy Statement above) show that option 3 (grey line) would have the **overall** least carbon emissions over a 60-year lifespan while option 1 (blue line) would have the most, due to a very high percentage of operational carbon emissions over this time span. **When considering the Whole Life-Cycle carbon impact, option 3 would achieve paybacks through operational carbon reduction – after 19 years compared to option 2 and after 24 years compared to option 1. The applicants therefore decided to pursue redevelopment option 3.**