

Committee:	Date:
Planning and Transportation	16 November 2021
Subject: 115 - 123 Houndsditch London EC3A 7BU Demolition of existing buildings and construction of a new building comprising four basement levels (plus one basement mezzanine), ground floor plus 23 upper storeys, including office use (Class E), flexible retail / cafe use (Class E); community space (Sui Generis), ancillary basement cycle parking, servicing and plant; new public realm and highway works; and other works associated with the development. (The proposed development would provide 56,533sq.m GIA of office floorspace (Class E), 85sq.m GIA of flexible retail / cafe floorspace (Class E), 238sq.m GIA of community floorspace (Sui Generis) and 10,011sq.m GIA of ancillary floorspace; Total floorspace 66,867 sq.m; Overall Height 116.995m AOD). (The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.)	Public
Ward: Aldgate	For Decision
Registered No: 21/00622/FULEIA	Registered on: 19 July 2021
Conservation Area:	Listed Building: No

Summary

The site comprises the Land Bounded by Cutler Street and Houndsditch: 2 to 22 (even) and 28 Cutler Street, 115 to 120 and 123 to 125 Houndsditch, 1 to 8 and 24 to 26 Clothier Street and 1 to 12 Exchange Buildings as well as areas of Public Highway.

The Site comprises of four separate buildings built in the 1980s, including 115 Houndsditch (Cutlers Court), 120 Houndsditch and 123 Houndsditch (Cutlers Exchange) which are ground plus 5 storeys, and 117-119 Houndsditch which is ground plus 6 storeys.

Planning Permission is sought for the demolition of the existing buildings and construction of a new building comprising four basement levels (plus one basement mezzanine), ground floor plus 23 upper storeys, including office use (Class E), retail space (Class E); community space (Sui Generis), ancillary basement cycle parking, servicing and plant accommodation; and new public realm.

The development would provide 56,533sq.m GIA of office floorspace (Class E), 85sq.m GIA of retail floorspace (Class E), 238sq.m GIA of community floorspace (Sui Generis) and 10,011sq.m GIA of ancillary floorspace; totalling 66,867sq.m of floorspace.

Objections have been received from residents and third parties relating to the massing and bulk of the development, daylight and sunlight implications, the impact on the environment, impact on the amenity of the immediately surrounding area and buildings, and the loss of Clothier Street. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations.

The proposal would deliver a high quality, triple aspect, office-led development with an outward facing socially inclusive cultural dimension and significant enhancements to the existing public realm which would meet the growing business needs of the City, supporting and strengthening opportunities for continued collaboration and clustering of businesses.

The building has been designed to accommodate new ways of working reflected in flexible and adaptable floorspace to meet the demands of different types of business occupiers, including incubators, start-ups and other small and medium sized companies. The office space would be complemented by publicly accessible retail, community space and useable and increased public realm with flexible possibilities to support Petticoat Lane Market including storage and infrastructure for complementary popups.

These benefits would significantly enhance the vibrancy to the City's streets and create an active and engaging base to the building benefitting the City's diverse communities. These include:

- Community Space at ground and mezzanine level with a focus on urban greening and gardening supporting local needs, learning, sustainability with free access to local communities and school access
- Three retail units totalling including one affordable unit which would be available at 60% of market rates
- Incubator space would be provided over floors 1 and 2 including 23 desk spaces at 50% of market rate
- Opportunities for free storage space to support Petticoat Lane Market traders and the potential pop ups and kiosks along Cutler Street West

The development would deliver high quality distinctive, world class architecture and would enrich and add visual interest to local townscape and

Citywide skylines. The proposals will provide additional architectural and artistic collaborations supporting inclusiveness and working in partnership with local and diverse creatives, including heritage interpretation opportunities which would celebrate the history of the area.

The proposal would deliver a tall building on a suitable site. The proposal would not harm and would protect pan-London LVMF and local strategic views, and would preserve the OUV/significance, authenticity and integrity of the Tower of London World Heritage Site.

The proposal would preserve the special interest/significance and setting of designated heritage assets and non-designated heritage assets and would seek to enhance and celebrate heritage through artistic and cultural collaborations and interpretations.

The scheme benefits from high levels of public transport accessibility, would be car-free except for two blue-badge parking spaces in the basement and would promote cycling and walking as healthy modes of travel. It would comply with the London Plan requirements for long and short stay cycle parking, including a number of short stay cycle parking spaces within the new public realm.

Further enhancements include improving pedestrian movement and comfort to the streets wrapping around the building by setting back the new building line. The increase in floorspace and occupation of the development has the potential to place extra pressure on the comfort and safety of the City's streets. Overall, the pedestrian experience around the site is expected to significantly improve as a result of the proposals.

The existing Clothier Street is a service and refuse area which is poor quality in terms of public realm, safety and vibrancy and deemed to have no heritage value other than in name but does contribute to the permeability of the local area. To enable the deliverability of the scheme and its many benefits the existing route would be required to be stopped up. This impact is considered to be mitigated by the qualitative and quantitative benefits of the scheme in terms of public realm, pedestrian comfort, inclusiveness and safety. However, any stopping up would be subject to the separate statutory procedure.

The scheme delivers significant public realm enhancements, including an increase in quantity and quality of public realm. The perimeter spaces wrapping around the building would be outward facing, attractive and accessible spaces. There would be a net gain of approximately 173sq.m of new public realm and 27sq.m of public highway land.

The proposals would be particularly progressive and ambitious in terms of sustainability credentials for a tall building in the City of London.

- Operational carbon emissions reduced by 44% compared to a building regs compliant building, exceeding the minimum GLA requirement of 35%.

- Whole Life-Cycle carbon emissions reduced to comply with the GLA's aspirational benchmark
- Incorporation of thermal stores for waste heat to support development's space heating and share waste heat with the neighbouring Middlesex Street Estate
- Targeting an ambitious low operational energy use intensity in line with the London Energy Transformation Initiative's (LETI) target of 55 kWh/m² (GIA) for the completed development. A raft of measures, e.g. relating to tenants agreements, power purchase agreements and reviewing the building services strategy are intended to be put in place to achieve this.
- On track to achieving highest ratings for BREEAM assessment "outstanding", WELL building standard "Platinum" and LEEDS standard "Platinum".
- Heat Rejection to Middlesex Estate to recirculate energy waste.

Urban greening is integral to the architecture and would be beneficial to all users of the building and would be experienced both from a distance and close proximity to the building. The existing UGF on the site is 0.00 and the proposed is calculated at 0.53 which significantly exceeds policy requirements.

There is one major adverse impact on nearby open space and a small number of minor adverse impacts to nearby residential properties, in terms of loss of daylight and sunlight, and overshadowing. However, taking into account the BRE Guidance, it is considered that the proposed development would not reduce the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, and would accord with relevant Local Plan and draft City Plan 2036 policies.

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

The impacts of the proposed development on residential amenity have been considered and it has been concluded that the impact on residential amenity would not be significant, and the development would comply with Local Plan relevant policies.

The environmental impacts of the proposal, including wind microclimate, thermal comfort, flood risk, and air quality have been addressed in the application documents. It is considered that the proposed development would not have any significant adverse impact upon the environmental conditions of the surrounding area, and would comply with relevant Local Plan policies.

This development would be a progressive approach to sustainable, circular, accessible and behavioural design and addresses many of the key issues facing the City, London and the UK by providing a state of the art workplace that contributes to the local environment, City workers and local communities and supports the agenda for the City and London's Covid recovery.

It is almost always the case that where major development proposals come forward in the City there is at least some degree of non-compliance with planning policies. In arriving at a decision, it is necessary to have regard to all the policies in the development plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

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

Applying the approach in section 38(6) of the Planning and Compulsory Purchase Act 2004, it is considered that the proposed development complies with the development plan as a whole. Officers recommend that planning permission should be granted for the proposed development subject to all the relevant conditions being applied and planning obligations and other agreements being entered into under S106 of the Town and Country Planning Act 1990.

Recommendation

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

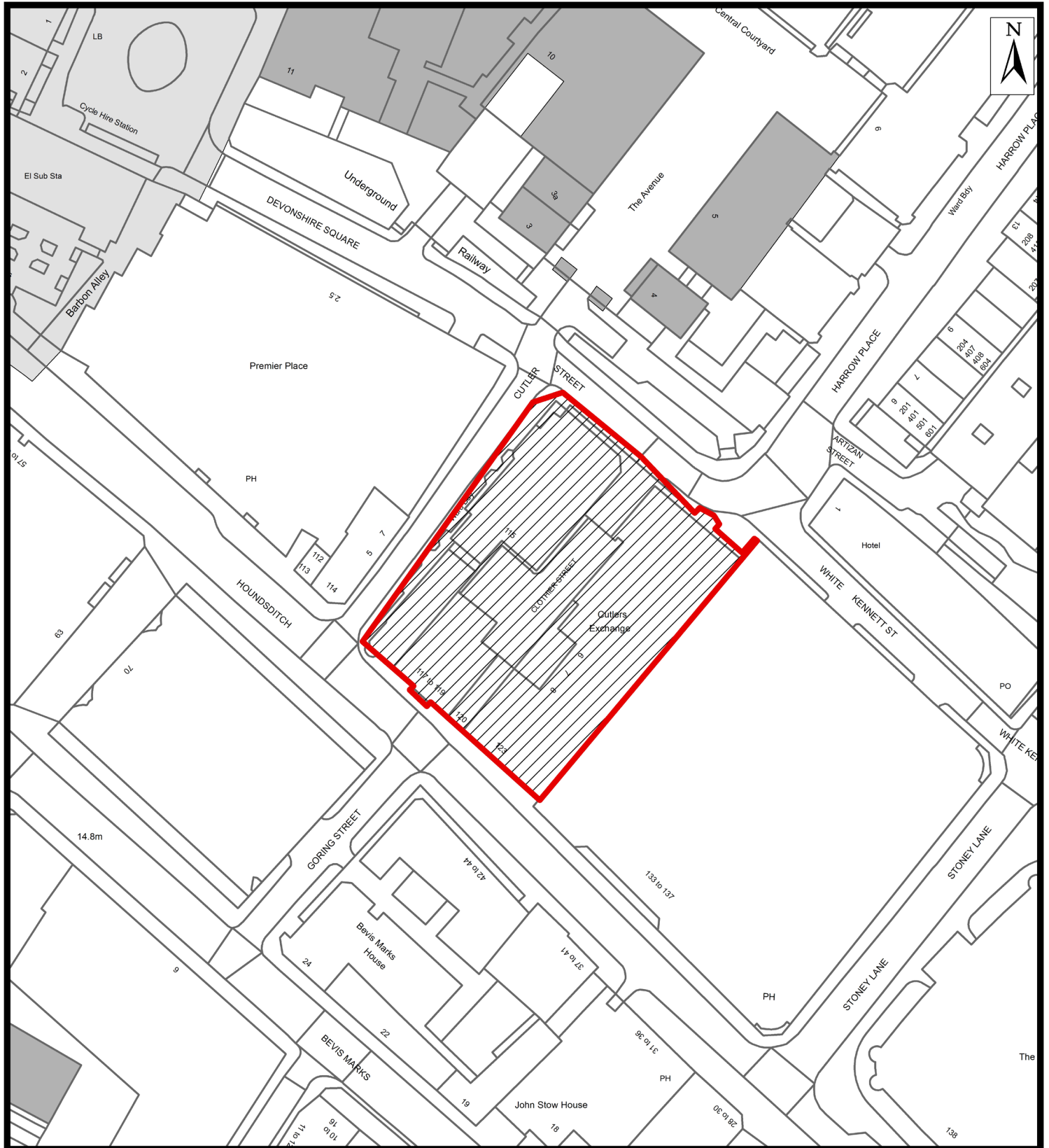
a) planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed;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

b) either receiving confirmation from the Secretary of State that the Corporation may grant planning permission as recommended or the expiry of the 30 day referral period.

2. That you agree in principle that the land affected by the proposal which is currently public highway and land over which the public have right of access (comprising the entire area of Clothier Street) may be stopped up to enable the development to proceed and, upon receipt of the formal application, officers be instructed to proceed with arrangements for advertising and making of a Stopping-up Order for the various areas under the delegation arrangements approved by the Court of Common Council.

3. That your Officers be authorised to provide the information required by regulations 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

Site Location Plan



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ADDRESS:
115-123 Houndsditch
EC3A 7BU

CASE No.
21/00622/FULEIA



SITE LOCATION



LISTED BUILDINGS



CONSERVATION AREA BOUNDARY



CITY OF LONDON BOUNDARY

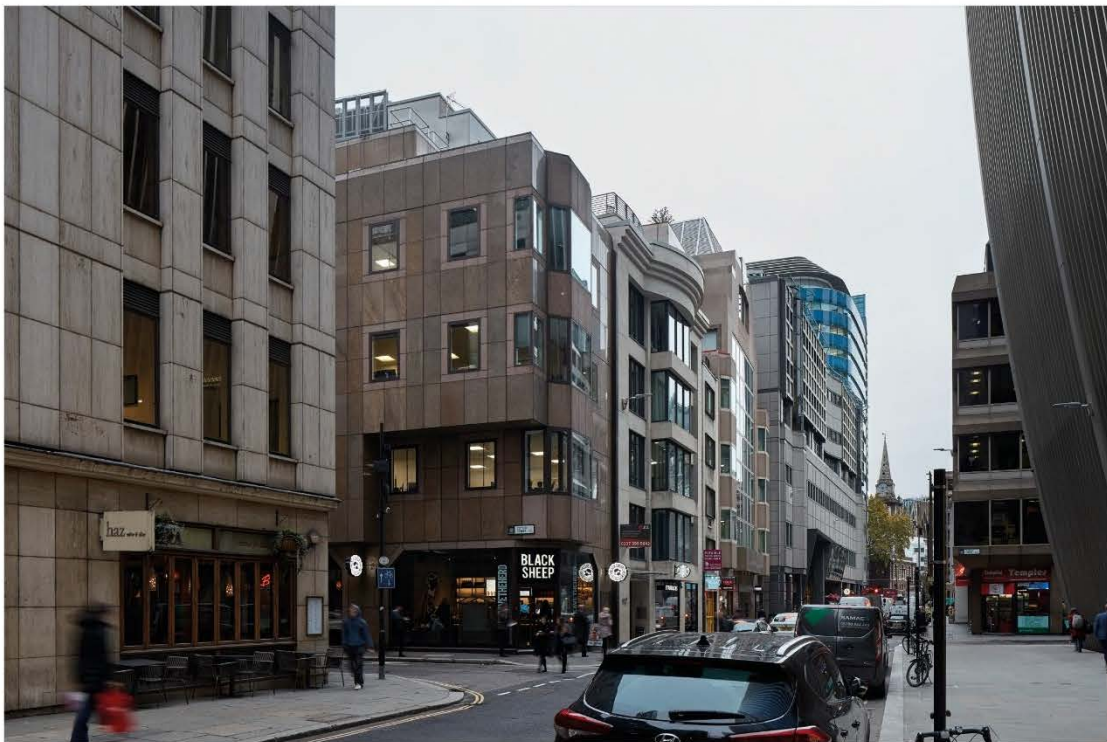


**CITY
OF
LONDON**

ENVIRONMENT DEPARTMENT



Approach from Harrow Place



Approach from Houndsditch



Approach from Devonshire

Main Report

Environmental Statement

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
 - a) To examine the environmental information;
 - b) To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination;
 - c) To integrate that conclusion into the decision as to whether planning permission is to be granted; and
 - d) If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
4. The local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to at paragraph 3(b) above is up to date.
5. The draft statement attached to this report at Appendix A sets out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions set out in the statement are up to date.
6. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also forms part of the environmental information before your Committee.
7. The Environmental Statement is available online together with the application, drawings, relevant policy documents and the representations received in respect of the application.

Site and Surroundings

8. The site extends to approximately 2,884 sqm (0.2884 ha) and comprises the Land Bounded by Cutler Street and Houndsditch: 2 to 22 (even) and

28 Cutler Street, 115 to 120 and 123 to 125 Houndsditch, 1 to 8 and 24 to 26 Clothier Street and 1 to 12 Exchange Buildings as well as areas of Public Highway.

9. The Site comprises of four separate buildings built in the 1980s, including 115 Houndsditch (Cutlers Court), 120 Houndsditch and 123 Houndsditch (Cutlers Exchange) which are ground plus 5 storeys, and 117-119 Houndsditch which is ground plus 6 storeys. The configuration of the Site comprises 14,326 sqm GIA (15,340 sqm GEA) of floorspace, this constituting 11,755 sqm GIA of office floorspace, 667 sqm GIA of retail floorspace, and 1,904 sqm GIA of back of house space.
10. None of the existing buildings within the Site boundary are listed. The Site is, however, situated in close proximity to a number of heritage assets, notably, and within about 0.1km of the Site, the 'London Wall: remains of Roman wall and bastion, Goring Street' scheduled monument, which sits to the north of the Site. Other listed buildings that sit in close proximity to the Site include the Grade II Listed Port of London Authority's Warehouses and Boundary Walls to the north west, and further afield, the Grade I Listed Bevis Marks Synagogue at Heneage Lane, which is just over 0.1km to the south of the Site, and the Grade II* Holland House beyond this. There are a number of other listed properties within the wider area and these are set out clearly as part of the Site context work included within the Design and Access Statement and as part of the TVBHA. The Site is not located within a Conservation Area. However, there are 3 Conservation Areas within a 250m radius of the Site, 'Bishopsgate' to the north-west, 'Wentworth Street' to the north and 'St Helen's Place' to the south-west. The wider context comprises St Paul's Cathedral (Grade I listed) and the Tower of London World Heritage Site (WHS).
11. The site lies within the defined 'Eastern Cluster' area (Policy CS7 of the adopted CoL Local Plan) which is identifiable as a cluster of the City's major financial and insurance firms, along with complementary uses, including retail, leisure and 'cultural heritage'.
12. The Site is located within Flood Zone 1 (land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)) and as such it has a low probability of flooding.
13. The Site is located within London's Central Activities Zone ('CAZ'), as defined in the London Plan which supports a range of strategic uses and functions including those relating to business, retailing and tourism.
14. The Site is located within an Airport Safeguarding Area.

Proposal

15. Planning Permission is sought for:
'Demolition of existing buildings and construction of a new building comprising four basement levels (plus one basement mezzanine), ground floor plus 23 upper storeys, including office use (Class E), flexible retail / cafe use (Class E); community space (Sui Generis),

ancillary basement cycle parking, servicing and plant; new public realm and highway works; and other works associated with the development.

(The proposed development would provide 56,533sq.m GIA of office floorspace (Class E), 85sq.m GIA of flexible retail / cafe floorspace (Class E), 238sq.m GIA of community floorspace (Sui Generis) and 10,011sq.m GIA of ancillary floorspace; Total floorspace 66,867sq.m; Overall Height 116.995m AOD).'

16. The proposed development would comprise a total of 66,867 sqm (GIA) incorporating the following land uses:

Use	Floor Level	Floor Area (GIA)
Office (Class E)	Level 01- Level 23	56,533sq.m
Retail and Café Use (Class E)	Ground	85sq.m
Community Use (Sui Generis)	Ground and Mezzanine	238sq.m
Ancillary (cycle parking)	Basement Levels	827sq.m
Ancillary (plant space, building management, fire command centre, security room, refuse and misc. storage and servicing areas)	Basement Levels	9,184sq.m

17. The proposed building is ground floor plus 23 upper storeys, and it will reach a maximum height of 116.995m AOD, equivalent to about 103m Above Ground Level ('AGL') which varies due to level changes across the Site.
18. The scheme is an office led development that would provide a minimum of 56,533sq.m (GIA) of new flexible office floorspace (Class E) across Level 01 to level 23. The office floorplates are designed to be occupied at a density of 1 person per 8m²; to accommodate a variety of possible office tenants across a range of corporate sector companies and to allow flexibility for tenancies to extend across floors and to use parts of individual floors through the creation of easily divisible and flexible space.
19. The Proposed Development will also deliver flexible space which is designed for incubator / SME users, located at Levels 1 and 2 of the proposed building. The 4,037sq.m GIA of space across these two floors will be made available as incubator space intended for SMEs, including affordable workspace comprising 23 desks available at 50% of market rent.
20. The office lobby is located at ground floor, with entrances from both Houndsditch and Cutler Street, allowing access from the south and north of the Site. Level access to the lobby space and prominent entrances for

cyclists that take users down to basement parking and associated amenities would be provided. The main method of vertical transportation from the reception to the office floors will be via lifts, although there is prominent stair access, encouraging active circulation.

21. The Proposed Development also incorporates various terraces and balconies, providing important office amenity, with landscaped planters on each level. At the top of the building there is a pavilion which connects to stepped roof terraces.

Public Realm

22. Clothier Street, an existing public highway in the middle of the site, which primarily supports back of house and servicing activity, is proposed to be stopped up as part of the Proposed Development. (This will be subject to the statutory stopping up procedures).
23. The Proposed Development will deliver approximately 580sq.m of public realm wrapping around the proposed building, including 372sq.m of land that is currently in the Applicant's ownership and that is proposed to be offered for dedication and adoption as new public highway to the CoL. The public realm would be extensively landscaped and greened; the development as a whole will secure a UGF score of 0.53, far exceeding policy requirements and a significant quantum of seating will be incorporated (46 spaces for 'sitting' or 'perching' proposed). The public realm design compliments the land uses proposed, specifically the retail spaces at ground floor and the community space located at the northern end of the building, as well as the delivery of carefully embedded security measures, including Hostile Vehicle Mitigation which has been designed into the public realm seating and planting strategy
24. Wider pavements around the site will be delivered, including a consistent minimum 2m wide pavement extending to between 3.9m and 7.4m in width. As well as creating an enlarged public realm within the Site boundary, the proposals include the delivery of a raised table along Cutler Street (West) and Cutler Street (North) enhancing the wider public realm environment and prioritising pedestrian and cycle movement. High quality natural York stone will be used for the paving in and around the Site. Within the public realm, it is proposed to have areas for the display of art installations and heritage interpretation as well as opportunities for market stalls as a potential extension to Petticoat Lane Market. The new public realm of Cutler Street will assist in improving connectivity between the City Cluster and the communities and areas to the north and east.

Retail Floorspace

25. The Proposed Development would provide 85sq.m GIA of flexible Class E retail / café space provided in three individual units at ground floor all similar in size. One of the retail units, comprising 28sq.m GIA, is proposed as affordable retail.

Community Space

26. A community space is proposed within the northern end of the building fronting onto Cutlers Street (North), comprising 238 sqm GIA at ground and mezzanine level.
27. The Community Space will sit alongside 'the garden street' and is proposed to comprise 'growing rooms' (social spaces and anchor for community garden and learning programmes, including workshop space for community and education groups and a retail component supplying local produce and light café/ food and beverage offer).
28. The community space will be available for use, free of charge, for registered education providers, community groups and charities between 7am and 10pm daily on weekdays, and between 10am and 6pm at weekends, with the food and beverage offer being available daily between these times as well.

Ancillary space: servicing, plant & cycle parking

29. The Proposed Development includes four levels of basement (plus a partial mezzanine at basement level 4) and has been arranged to accommodate plant machinery / equipment (with additional plant located at the top of the building), space for servicing, together with cycle parking and associated facilities.
30. The proposed basement level 1 (B1) will replace the existing single storey basements and will comprise extensive cycle parking and access arrangements, together with supporting facilities for showers, lockers and management. Proposed levels B2 and B3 are separate but effectively a 'shared volume' given that the proposed basement air handling units are double height and occupy space at both levels. These levels also include the extensive thermal storage tanks for cooling water (which extend from B4 up to the underside of the B1 slab). It is through the provisions of this infrastructure that the Applicant is able to offer and future proof the opportunity for the Middlesex Street Estate heat exchange scheme. The proposed B4 level contains the principal servicing facilities for the development, including the two vehicle lifts, two servicing bays, post room and refuse / recycling management facilities (bin stores), plus two accessible parking bays. The remainder of B4 and partial B4M (mezzanine) contain the remaining double height storage tanks for heating water, sprinkler and wet rising mains with associated pumps and grey water storage and processing.
31. Facilities for cyclists, comprising a total of 948 long stay and 33 short stay cycle parking spaces, will be provided. Alongside the cycle spaces, associated facilities for cyclists are also proposed, including showers, changing, locker and bicycle repair facilities. In addition to providing for cyclists, lockers and showers are provided for those walking or running to the Site. Access for cyclists from ground floor to the basement will be from dedicated and prominent cycle parking entrances at ground level from the north and south of the Site, which include dedicated cycle lifts from ground level. 21 short stay spaces are within the basement, with 12

spaces located in the new public realm within the site boundary (including 10 for the retail and community space uses).

32. All servicing for the development is proposed within the confines of the Site. The servicing bays are housed at the B4 level and are accessed via a pair of 15 Tonne vehicle lifts accessed from Houndsditch.
33. Dedicated areas of planting and greening would be incorporated into the development through a combination of green walls, green landscaping and new tree planting at ground level within the surrounding public realm.

Consultation

34. The Applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders. Prior to the application being submitted the applicant has undertaken extensive pre-application consultation with key stakeholders and local community (including nearby residents). The applicants have ongoing engagement with the Middlesex Estate Residents Association Chair from pre-application through the application process.
35. The applicant wrote to all neighbours, both residential and commercial, surrounding the site to invite them to take part in the consultation. Public engagement activities have taken place as a series of virtual presentations to key local stakeholders, two virtual exhibitions with digital feedback opportunities (with an alternative postal exhibition offered to consultees on the detailed design), two webinars with close neighbours, postal newsletters promoting the consultation, and targeted social media activities. This has given stakeholders, residents, and businesses the opportunity to meet with the Applicant and wider members of the project team and in the case of virtual presentations to key local stakeholders, be briefed on the application, and provide feedback on the detailed proposals. Meetings were held with key stakeholders on the following dates:
 - 23rd April 2021 Aldgate Connects BID
 - 16th May 2021 Middlesex Street Estate Residents Association (Middlesex Street Estate Site Visit)
 - 19th May 2021 Portsoken ward members
 - 21st May 2021 Middlesex Street Residents Association
 - 4th June 2021 Bevis Marks Synagogue
 - 17th June 2021 Middlesex Street Estate Residents Association
36. Following receipt of the application it has been advertised on site and in the press and following the receipt of additional information has been consulted upon twice, under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Copies of all received letters and e-mails making representations are attached in full and appended to this report. A summary of all planning considerations within the representations received, and the consultation responses is set out in the tables below.

37. A total of 29 responses were received, 24 objections, four neutral representations and one letter of support.
38. The views of other City of London departments have been taken into account in the preparation of this redevelopment scheme and some detailed matters remain to be dealt with under conditions and the Section 106 agreement.
39. The applicants have provided a detailed response to matters raised in consultee and third-party responses which are available to view on the public website and are listed in the background papers list at the end of this report.

Consultation Response	
Historic England	<p>On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant.</p> <p>Officer Response to Comments: No further action required</p>
NATS Safeguarding	<p>The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.</p> <p>Officer Response to Comments: No further action required</p>
Transport for London	<p>Healthy Streets and ATZ</p> <ul style="list-style-type: none"> – The Transport Assessment is in a Healthy Streets format and includes an ATZ assessment in line with TFL guidance. <p>Trip generation assessment</p> <ul style="list-style-type: none"> – The applicant must confirm where line planning capacity information presented in the Healthy Streets Transport assessment has been obtained from. – Given there is an existing office space at this location, TfL requests the applicant uses existing occupant travel data to assess the split of LU trips by station, line and direction. <p>Public Realm</p> <ul style="list-style-type: none"> – TfL requests justification for the reintroduction of two-way traffic on Cutler Street North. Given the constraints on pedestrian space in this area, TfL would support retaining a one-way system (with cycle contraflow) and further narrowing of the carriageway. – Trees are proposed in the middle of the footway reducing usable pedestrian space. This imposes an unnecessary constraint on space for

	<p>pedestrians. TfL would support trees moving out towards the kerb so that people can walk building-side in line with London Plan policies T2 (Healthy Streets) and D8 (Public realm). This will also increase access to light for the trees and allow the tree pits to take surface water run-off more effectively.</p> <p>Cycle Parking</p> <ul style="list-style-type: none"> - TfL requires more information on access to the basement cycle parking is provided <p>Officer Response to Comments: This has been resolved and is addressed in section Transport and Highways of this report.</p>
London City Airport	Consulted, no comments received.
Natural England	<p>SUMMARY OF NATURAL ENGLAND'S ADVICE - NO OBJECTION - Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.</p> <p>Officer Response to Comments: No further action required</p>
Crossrail Ltd	<p>The implications of the Crossrail proposals for the application have been considered and I write to inform you that Crossrail Limited does not wish to make any comment on the application as submitted.</p> <p>Officer Response to Comments: No further action required</p>
Thames Water	<p>Thames Water would advise that with regard to FOUL WATER sewerage network infrastructure capacity, we would not have any objection to the above planning application. Thames Water would advise that with regard to SURFACE WATER network infrastructure capacity, we would not have any objection to the above planning application. Conditions were also recommended regarding WATER.</p> <p>Officer Response to Comments: No further action required</p>
Network Rail	<p>Thank you for consulting Network Rail regarding the above application. After reviewing the associated information, I would like to inform you that Network Rail have no objections to the proposals.</p> <p>Officer Response to Comments: No further action required</p>
Environment Agency	<p>There are, no environmental constraints within our remit on this site and we therefore have no comments at this time.</p> <p>Officer Response to Comments: No further action required</p>

London Borough of Southwark	Consulted, no comments received.
London Borough of Islington	Consulted, no comments received.
London Borough of Hackney	I can confirm that the London Borough of Hackney has no objections to the proposed development. Officer Response to Comments: No further action required
London Borough of Tower Hamlets	The Local Planning Authority has no comments to make. Officer Response to Comments: No further action required
H.M Tower of London	Consulted, no comments received
Historic Royal Palaces	Consulted, no comments received
Cleansing Services	The waste storage and collection facilities comply with the requirements of BS5906 specification. All occupants of the development will have access to the waste storage facilities. Officer Response to Comments: No further action required
Lead Local Flood Authority	Raised no objections to the proposals and have recommended conditions to be attached
Department for Levelling Up Housing and Communities	Consulted, no comments received.

Representations from members of the public (objections)	
Loss of light to podium (courtyard at Middlesex Street Estate)	Officers Response to Comments: Addressed in the section of the report entitled 'Daylight, sunlight and overshadowing'.
Loss of light to flats	Officers Response to Comments: Addressed in the section of the report entitled 'Daylight, sunlight and overshadowing'.
Loss of day and sunlight to commercial units located at Harrow Place	Officers Response to Comments: Addressed in the section of the report entitled 'Daylight, sunlight and overshadowing'.
Block view of the sky and reduce daylight	Officers Response to Comments: Addressed in the section of the report entitled 'Daylight, sunlight and overshadowing'.

Overshadowing	Officers Response to Comments: Addressed in the section of the report entitled 'Daylight, sunlight and overshadowing'.
Loss of Privacy	Officers Response to Comments: Addressed in the section of the report entitled 'Overlooking'.
Environmental Impact	Officers Response to Comments: Addressed in the section of the report entitled 'Environmental Impact of Proposals on Surrounding Area'
Principle of 'Net Zero Carbon' misleading	Officers Response to Comments: Addressed in the section of the report entitled 'Energy and CO2 emissions'.
Sustainability Impact due to complete demolition of building	Officers Response to Comments: Addressed in the section of the report entitled 'Energy and Sustainability'.
Viability of Retail Space	Officers Response to Comments: Addressed in the section of the report entitled 'Economic Issues and Retail Floor Space'.
Viability of Office Space	Officers Response to Comments: Addressed in the section of the report entitled 'Economic Issues and Proposal'.
Noise from construction	Officers Response to Comments: Addressed in the section of the report entitled 'Noise and Vibration'.
Noise from increased traffic	Officers Response to Comments: Addressed in the section of the report entitled 'Noise and Vibration'.
Disruptions from construction	Officers Response to Comments: Addressed in the section of the report entitled 'Construction and Logistics' and the section of the report entitled 'Transport and Highways'.
Height of building higher than existing buildings	Officers Response to Comments: Addressed in the section of the report entitled 'Height, Massing and Design'.
Impact to existing business	Officers Response to Comments: Addressed in the section of the report entitled 'Considerations and Economic Issues'.
Size and scale of proposal in relation to existing buildings	Officers Response to Comments: Addressed in the section of the report entitled 'Height, Massing and Design'.
Loss of Air Quality	Officers Response to Comments: Addressed in the section of the report entitled 'Air Quality'.
Loss of historic Clothier Street	Officers Response to Comments: Addressed in the section of the report entitled 'Demolition of the existing buildings and removal of Clothier Street' and the section of the report entitled 'Transport and Highways'.
Loss of Amenity/ Children's	Officers Response to Comments:

Playground/ Podium Gardens	Addressed in the section of the report entitled 'Proposed Development with Existing Surrounding Buildings'.
General Pollution	Officers Response to Comments: Addressed in the section of the report entitled 'Light Pollution', the section of the report entitled 'Environmental Impact of Proposals on Surrounding Area', the section of the report entitled 'Noise and Vibration' and the section of the report entitled 'Transport and Highways'.
Traffic due to extra vehicle use generated with deliveries and visitors	Officers Response to Comments: Addressed in the section of the report entitled 'Transport and Highways'.
Overcrowding of the streets	Officers Response to Comments: Addressed in the section of the report entitled 'Transport and Highways'.
Out of character	Officers Response to Comments: Addressed in the section of the report entitled 'Height, Massing and Design'.
Insufficient greenery contribution	Officers Response to Comments: Addressed in the section of the report entitled 'Public Realm'.
Blocking light will prejudice the future installation of solar power generation on the Estate	Officers Response to Comments: Addressed in the section of the report entitled 'Daylight Sunlight and Overshadowing'.
Impact on Bevis Marks	Officers Response to Comments: Addressed in the section of the report entitled 'Heritage'.
There is no absolute commitment to build an effective heat transfer infrastructure, and then the amount of usable heat that will be transferred is questionable.	Officers Response to Comments: Addressed in the section of the report entitled 'Heat Transfer to Estate'.
Loss of Clothier Street as a public asset and right of way	Officers Response to Comments: Addressed in the section of the report entitled 'Transport and Highways', the section of the report entitled 'Public Realm' and the section of the report entitled 'Demolition of the existing buildings and removal of Clothier Street'.

Representations from members of the public (Neutral)

Duration of construction	Officers Response to Comments:
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	Addressed in the section of the report entitled 'Construction and Logistics' and within the section of the report entitled 'Transport and Highways'.
Information regarding the cumulative effect on the loss of light to flats	Officers Response to Comments: Addressed in the section of the report entitled 'Daylight, sunlight and overshadowing'.
Information on how business will be affected following approval.	Officers Response to Comments: Addressed in the section of the report entitled 'Considerations' and the section of the report entitled 'Transport and Highways'.

Representations from members of the public (support)	
The new community space will allow more green facilities/ initiatives	Officers Response to Comments: Addressed in the section of the report entitled 'Public Realm'.

Policy Context

40. The development plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
41. The City of London has prepared a draft plan which is a material consideration to be taken into account. The draft City Plan 2036 was approved for consultation by the Court of Common Council in May 2020 and January 2021. The draft City Plan 2036 has been published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. As such, the draft City Plan is a material consideration in the determination of applications.
42. Government Guidance is contained in the National Planning Policy Framework (NPPF) July 2021 and the Planning Practice Guidance (PPG) which is amended from time to time.
43. There is relevant GLA supplementary planning guidance and other policy in respect of: Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014), Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014), Sustainable Design and Construction (GLA, September 2014), Social Infrastructure GLA May 2015) Culture and Night-Time Economy SPG (GLA, November 2017), London Environment Strategy (GLA, May 2018), London View Management Framework SPG (GLA, March 2012), Cultural Strategy (GLA, 2018); Mayoral CIL 2 Charging Schedule (April 2019), Central Activities Zone (GLA March 2016), Shaping Neighbourhoods: Character and Context (GLA June 2014); London Planning Statement SPG (May 2014); Town Centres SPG (July 2014); Mayor's Transport Strategy (2018) and the Culture 2016 strategy.

44. Relevant City Corporation Guidance and SPDs comprises Air Quality SPD (CoL, July 2017), Archaeology and Development Guidance SPD (CoL, July 2017), City Lighting Strategy (CoL, October 2018) City Transport Strategy (CoL, May 2019), City Waste Strategy 2013-2020 (CoL, January 2014), Protected Views SPD (CoL, January 2012), City of London's Wind Microclimate Guidelines (CoL, 2019), Planning Obligations SPD (CoL, July 2014). Open Space Strategy (COL 2016), Office Use (CoL 2015), City Public Realm (CoL 2016), Cultural Strategy 2018 – 2022 (CoL, and relevant Conservation Area Summaries.

Considerations

45. The Corporation, in determining the planning application has the following main statutory duties to perform:-
- to have regard to the provisions of the development plan, so far as material to the application, local finance considerations so far as material to the application, and to any other material considerations. (Section 70 Town & Country Planning Act 1990);
 - to determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
46. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990);
47. The National Planning Policy Framework (NPPF) states at paragraph 2 that "Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise".
48. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
49. Paragraph 10 of the NPPF states that "at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:
- a) approving development proposals that accord with an up-to-date development plan without delay; or
 - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of date, granting permission unless:
 - c) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

- d) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
50. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
- a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
 - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
 - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)
51. Paragraph 81 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
52. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.
53. Paragraph 92 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
54. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 105 states that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health”.
55. Paragraph 112 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.
56. Paragraph 113 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”.
57. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 126 advises that “The creation of high quality, beautiful and

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

58. Paragraph 130 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.
59. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.
60. Paragraph 154 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.
61. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment.
62. Paragraph 195 of the NPPF advises that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.
63. Paragraph 197 of the NPPF advises, “In determining applications, local planning authorities should take account of:
 - a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality;

and

- c) the desirability of new development making a positive contribution to local character and distinctiveness.”
64. Paragraph 199 of the NPPF advises “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
65. Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
 - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
66. Paragraph 202 of the NPPF states “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.
67. Paragraph 203 of the NPPF states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.

Considerations in this case

68. In considering this planning application account has to be taken of the environmental information including the Environmental Statement, the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.
69. The principal issues in considering this application are:
- The extent to which the proposals comply with the Development Plan.
 - The extent to which the proposals comply with the NPPF
 - Economic issues
 - The appropriateness of the proposed uses
 - The impact of the development in design and heritage terms including impact on designated and non-designated heritage assets.

- The impact of the proposal on Strategic Views and Protected Views.
- The impact of the proposal on The Tower of London World Heritage Site.
- The impact of the proposal on any archaeology beneath the site.
- The accessibility and inclusivity of the development.
- Transport, servicing, cycle parking provision and impact on highways
- The proposed public realm benefits and cultural/community offer
- The impact of the proposal in terms of energy and sustainability.
- The impact of the proposed development on the amenity of nearby residential occupiers, including noise, overlooking, daylight, sunlight and light pollution.
- The environmental impacts of the proposal including wind microclimate, flood risk, and air quality.
- The requirement for financial contributions.

Economic Issues

70. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 520,000 people.
71. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can provide a significant competitive advantage.
72. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that a majority of businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.

73. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.
74. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2017 London Labour Market Projections and 2017 London Office Policy Review), that City of London employment will grow by 116,000 from 2016 to 2036, of which approximately 103,000 employees are estimated to be office based. London's rapidly growing population will create the demand for more employment and for the space required to accommodate it.
75. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.
76. The London Plan projects future employment growth across London, projecting an increase in City employment. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
77. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
78. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.
79. The draft City Plan 2036 policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 2,000,000sqm during the period 2016-2036. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.

80. The application site is located within the area identified as the Eastern Cluster in the Local Plan 2015.
81. The areas to which the cluster policy applies is defined by illustrative diagrams in the adopted and emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on suitable (Local Plan) or appropriate (emerging City Plan) sites. As outlined at para 2.7 of the Local Plan and paras 3.55 and 7.13 of the draft City Plan 2036 the boundary as shown in the diagrams is indicative and not prescriptive. The application site lies within the Eastern Cluster area as shown in Figure G in the adopted Local Plan
82. Despite the short term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and draft City Plan 2036 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations.

Principle of Uses

83. The proposed development would be arranged over four basement levels, ground and 23 upper floors to provide an office-led, mixed use development comprising predominantly office floorspace (Class E), with flexible retail/café units and community space, affordable workspace and improved public realm at the base of the building.

Proposed Office Accommodation

84. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Policy S4 of the draft City Plan 2036 seeks to ensure that new office floorspace is designed to be flexible to allow adaptation of space for different types and sizes of occupiers and to meet the needs of SME's, start-up companies and those requiring move on accommodation.
85. The application site currently provides 11,755sq.m of office floorspace over four separate buildings. The proposed development would provide 56,533sq.m (GIA) of office (Class E) floorspace on the site. This equates to a total uplift in office floorspace across the site of 44,778sq.m (GIA).
86. The proposed floorplates would allow for flexibility through the creation of easily divisible and flexible space, allowing for a range of tenant sizes including small and medium sized businesses in accordance with Local

Plan policy DM1.3, and would provide additional high quality office floorspace, both in terms of design and sustainability credentials.

87. The proposed development would include 4,037sq.m of incubator / flexible workspace at levels 1 and 2 of the proposed building. This space would be made available as incubator space intended for SMEs including local start-up businesses. This area would be intended to be available to lease as anything from individual desks to small private spaces. These two levels of incubator space are connected by a separate staircase from ground, as well as via the lower level lifts. As part of this incubator space, 23 desks within this area are proposed to be affordable, to be made available at 50% of market rate.
88. The office floorspace is considered to be well designed, flexible office accommodation in a well-considered and sustainable building, further consolidating the nationally significant cluster of economic activity in the City and contributing to its attractiveness as a world leading international financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ and supports the aims of Local Plan policy CS1 and draft City Plan 2036 policy S4.
89. Each floor of the building would have access to a planted terrace, with level 19 having access to a larger terrace. A larger terrace would also be located at level 23 which would provide communal space for tenants. An additional private terrace would be located on the south section of level 23 for the 'Sky Pavilion' offices.
90. The main office reception is at ground floor level with entrances from both Houndsditch and Cutler Street, allowing access from the south and north of the site. From here lifts would provide access to the upper office floors, with prominent stair access also available.
91. The proposed office accommodation supports the aims of Local Plan policy CS1 and the Proposed Submission Draft City Plan 2036 policy S4 and would provide flexible office floorplates for workers which are designed to meet the needs of a wide range of potential occupiers, in accordance with Policy DM1.3 in the adopted Local Plan and Policy OF1 in the Proposed Submission Draft City Plan 2036.

Proposed Retail

92. The application site currently provides 667sq.m (GIA) of retail floorspace at ground floor level, predominantly located on Houndsditch and Cutler Street (west). The existing retail appears to comprise a couple of take-away food outlets and a couple of coffee shops, along with a dry cleaner to the rear.
93. The proposed development would incorporate three retail units at ground floor level, providing a total of 85sq.m (GIA) of flexible retail / café (Class E) floorspace. This would result in a loss of 582sq.m (GIA) of retail floorspace.
94. One of the retail units, comprising 28sq.m (GIA), is proposed as affordable retail to be let to 'start-up retailers' (or equivalent), with a

preference given to those being local to the Site, by way of an affordable retail lease at a rent (including service charges and all other overheads) that is not more than 60% of open market rent, to be secured by Section 106 Agreement.

95. The site is not located in a Principal Shopping Centre (PSC) or Retail Link as identified in the Local Plan. Local Plan 2015 Policy DM20.3 resists the loss of small groups of retail groups, particularly near residential areas. Most of the existing retail units are largely aimed at City workers, rather than the nearby residents, with the possible exception of the dry cleaners. The loss of the retail in this location would not adversely impact the residents, particularly given that an affordable retail unit is proposed on Cutler Street, near to the Middlesex Street Estate. The loss of retail floorspace is to some extent also offset by the proposed community use space (see the following section).
96. In addition to the proposed retail units, the new public realm around the building would be designed to accommodate pop up market stalls, food or coffee vans, or gazebos for events. This potential activation of the public realm could further add to vibrancy of the street and complement the proposed retail offer as well as improve the connections through to Petticoat Market.
97. The existing retail units don't appear to be very prominent in the streetscape and the proposed development includes active frontages on each elevation, along with improved public realm, seating, and the potential for occasional pop-up retail within the new public realm. On balance, despite the loss of floorspace/frontage it is considered that the scheme would comply with Policy DM20.3. A condition is recommended to ensure that spaces proposed for retail use remain in that use and are not changed to any other use within Class E.

Community Space

98. Policy S1 of the London Plan states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported. Policy DM22.1 of the Local Plan states that the development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses, and will be permitted they would not be prejudicial to the business City, in locations convenient to the communities they serve, near to identified residential areas, and as part of major mixed-use developments.
99. It is proposed to provide a new community space in the north of the proposed building fronting onto Cutler Street (north), comprising 238sq.m (GIA) of floorspace at ground and mezzanine level. This has been developed following engagement with the local community and stakeholders. The space, alongside the external public realm, is designed around a 'greening' theme and would support a range of uses and activities meeting specific community needs. The space would comprise 'growing rooms' - social spaces for community garden and learning programmes, including workshop space for community and

education groups and a retail component supplying local produce and light café / food and beverage offer.

100. The Community Space would be available for use, free of charge, for registered education providers, community groups and charities between 7am and 10pm daily on weekdays, and between 10am and 6pm at weekends, with the food and beverage offer being available daily between these times as well. This space would be controlled through a Management Plan, to be secured by Section 106 Agreement.
101. An objection has been received from a nearby resident stating that there is already a community centre on the estate and as such this would not be a public benefit. Nevertheless, the community space proposed as part of this development is considered to be a different offering to that provided elsewhere in this area and is still considered to be a public benefit which would benefit the wider communities of this part of London.

Demolition of the existing buildings and removal of Clothier Street

102. The site has been redeveloped many times and through the late 17th century was part of a dense network of streets and yards between Houndsditch and Bishopsgate. The area was synonymous with trading and textiles with Petticoat Lane Clothing market dating from 1750s and East India Company warehouses to the north dating from 1768. By the late 19th century, the uses on the application site were varied and included warehouses, a clothing exchange, a Polish synagogue and a brewery. In the 20th century Cutler Street had a thriving market in clothing and nearby Houndsditch Warehouse was a successful department store from 1933 until demolition in 1986.
103. Historically there were two narrow NW-SE aligned streets, Clothier Street (formerly Carter Street) and Exchange Buildings which led from the western section of Cutler Street. Carter Street appears to date from the mid-18th century and Exchange Buildings from the post Great Fire period. The present NE-SW alignment of Clothier Street is at right angles to the previous street pattern and cuts across the former line of Clothier Street. The pedestrian route is close to the position of Exchange Buildings but does not respect its former width or length. The existing Clothier Street is therefore a relatively modern construct.
104. In the 1980s the area was redeveloped including the application site and comprises a series of post-modernist 5-6 storey office buildings. At this time the current L-shaped Clothier Street was established. Clothier Street is now a back of house service and refuse area and a somewhat hostile “back of house” route which bisects the northern part of the site and there is a pedestrian route through to the western section of Cutler Street. The existing postmodern buildings are polished stone with largely inactive ground floor elevations with narrow pavement widths surrounding the site and the area is one to move through rather than to linger.
105. The existing buildings, Clothier Street and the surrounding highway and pavement spaces in physical terms have no heritage value and present a poor-quality public realm experience. Collectively the demolition of the

existing buildings and loss of Clothier Street as a street plan are acceptable in townscape and heritage terms subject to compliance with other policies. The issues around demolition and whole life carbon are detailed in the sustainability section of the report and stopping up in the transport section.

106. Clothier Street (previously Carter Lane) is a street name established in approximately 1906. It reflects the second-hand clothing trade and clothes exchanges on the site and in the close vicinity and in name this has heritage evidential value. The site is also known for an attempted burglary at a jeweller's shop in Houndsditch in December 2010. Three City of London Police Officers were shot dead trying to prevent the burglary; this incident and events surrounding it were a precursor to the Siege of Sidney Street in January 2011. As part of the Cultural Plan as outlined this rich heritage of the site and historic associations would be recognised through interpretation panels and/or artwork. This would be secured and delivered through the final Cultural Plan and Strategy within the S106 agreement and include a commitment to engage with residents and other local stakeholders.

Height, massing and design

Principle of a Tall building

107. The proposal is defined as a tall building under the adopted Local Plan (CS 14, para 3.14.1 – those which significantly exceed the height of their general surroundings) and emerging City Plan (S12(1), buildings over 75m AOD>).
108. The proposed building would be in the north-east corner of the (Eastern) Cluster Policy Area CS7 in the adopted Local Plan (2015). This policy identifies the Cluster as the preferred location for siting tall buildings, where suitable or appropriate. Although the site falls just outside the draft replacement Local Plan's City Cluster policy area, the boundary is not prescriptive and the principle of a tall building on the immediate periphery still needs to be assessed on its planning merits. The principle of a taller building here is acceptable in broad policy terms though its height and design, including the impact on strategic and protected views, heritage, public realm and amenity need to be considered in accordance with policy CS14 of the Local Plan and policy S12 Tall Buildings of the draft City Plan.
109. The proposed tall building is not in an area identified as 'inappropriate for tall buildings' in either Plan. Local Plan Policy CS14 and emerging City Plan Policy S12 indicate that planning permission should be refused for tall buildings in conservation areas.
110. Strategically a tall building on this site supports good growth, London Plan and City Plan policies. The tall building therefore is to be assessed against the criteria set out in City Plan CS 14(3) and Draft City Plan S12(2-6), London Plan D9 and the wider provisions of the Development Plan.

Skyline Impact and Relationship with the City Cluster

111. Although within the adopted Local Plan's Eastern Cluster policy area the proposal is outside of the emerging CS21 City Cluster Key Area of Change. The proposed development would be a transition "lower" tall building in the north east fringe of the City as part of the foothills which step down northwards from the main City Cluster. As a comparison, the following list outlines the heights of existing, emerging and permitted towers in the City Cluster (in descending AOD height order, with the proposal in bold) as well as buildings within the surrounding local area to the site which form the lower foothills:

- 1 Undershaft: 305.9m
- 22 Bishopsgate: 294.94m
- 100 Leadenhall Street: 263.40m
- 122 Leadenhall Street: 239.40m
- 110 Bishopsgate (former Heron Tower): 217.80m
- 52-54 Lime Street: 206.50m
- Tower 42: 199.60m
- 31 Bury Street: 197.94m - REFUSED
- The Gherkin (30 St Mary Axe): 195m
- 6-8 Bishopsgate: 185.10m
- 1 Leadenhall Street: 182.70m
- 100 Bishopsgate: 184m
- 40 Leadenhall Street: 170m
- 115-123 Houndsditch **116.995m** (the current proposal)
- 24 Bevis Marks: 99.700m
- 70 St Mary Axe: 90m
- 6 Bevis Marks - 87.8m
- Petticoat Tower (approx) 85. 5m
- St Botolph Building 138 Houndsditch: 78.0m

112. The Planning and Transportation Committee were informed on 26 April 2016 that the Department of the Built Environment is undertaking three-dimensional (3D) digital modelling of the City Cluster to better understand the effect of existing planning policies for that area and its relationship to its environs and other parts of the City and in particular the Tower of London. This work is providing confidence that the Cluster can evolve while taking full account of views. The purpose of the modelling is to allow an appreciation of impacts arising from proposed development. The 3D modelling does not set policy or determine the future shape of the cluster.

113. Through this 3D modelling initiative, the City is aspiring to develop a Cluster of towers that step up in height from all directions towards an apex around 22 Bishopsgate/1 Undershaft. This was informed by the complex amalgamation of key views of the Tower of London, St Paul's Cathedral and other landmarks. In views from the south and south-east, north and northeast the proposed building's height would be broadly compliant with this modelled future shape as part of the lower foothills

outside of the City Cluster. The foothills facilitate a comfortable transitioning from very tall to the finer urban grain usually lower scale of the more sensitive and historic parts of the city.

114. The proposed height (24 storeys), form and high architectural quality would make a limited contribution to London's skyline as in many macro views the development would be screened by existing or emerging taller buildings. That said, due to its height, the proposed building would have a visual impact and change local townscape views and experiences.
115. The height and sculpted massing have been designed to respond to distant kinetic experiences to preserve the setting and silhouette of the Tower of London World Heritage Site and to comply with views within the SPG Management guidance for LVMF 10A.1 North Bastion of Tower Bridge and LVMF 25A.1, 25A.2, 25A.3 Queens Walk. In these viewing experiences the development would have no adverse impact and either sit below the ridge line of the Tower of London to protect the silhouette, blend into the existing background layers of the skyline or be some distance from the strategic landmark.
116. In more local contexts, the site sits within a transition zone and straddles two areas of distinctive scales and architectural characters. That of the high rise glassy commercial City Cluster to the south and southwest and the more solid smaller scale and partially warehouse/ Georgian and 20th century residential character of the city fringe townscape to the north and northeast including Devonshire Square, Middlesex Street Estate and Bishopsgate Conservation Area and borders LB Tower Hamlets.
117. The proposed height and massing would cascade from the south to north from 24 storeys (116. 995m AOD) to 18 storeys (90.190m AOD to 19th storey terrace) to mediate between the city cluster and lower scale and finer urban grain of the warehouse/residential context. The overall height and massing would be distinctly part of the foothills outside of the main City Cluster surrounded by emerging buildings of a similar height including: 6 Bevis Marks (87.m AOD), 24 Bevis Marks (99.700m AOD), 138 Houndsditch (78m AOD), 70 St Mary Axe (90m AOD) and the 1970s residential block Petticoat Tower (68.2m AOD).
118. The building line would be cut back at ground level to widen existing pavements and create a generosity at street level with active frontages and tree planting. The building line above the stepped back raked base would oversail the 4 storey base to a greater degree in some areas and a lesser degree in other areas around the perimeter compared to the existing building. The most significant increase would be to Cutler Street (West) and the northwest corner. Despite the quantifiable increase the raised height of the base and distribution of massing would increase daylight and views of the sky around the perimeter of the building particularly Cutler Street (West) This is further analysed in the Public Realm section.
119. As a 360 degree experience the tiered massing and different architectural treatments to the elevations would respond positively to the varied contexts. Where there are the kinetic glimpses of the building in

local long views within the city the height and massing would either be subordinate to taller buildings in the foreground such as from the west from London Wall or the development would be screened by other buildings or blend into existing and emerging townscape views from the south Leadenhall Street, Bury Street, Aldgate High Street and Minories. From Wentworth Conservation Area in the north (LB Tower Hamlets) the development would be experienced with the northeast elevation stepping down against a background of taller buildings in the City Cluster or with Petticoat Tower in the foreground.

120. In closer adjacencies the development would be visually impactful on the podium to Middlesex Street Estate known as Petticoat Square. There would be an indirect change in the experience of this space bringing the current taller northern edge fringe of the taller foothills closer to this private communal space. As a kinetic experience within the podium the appearance and impact would vary, and the development would either be experienced in the context of Petticoat Tower or as part of a background of existing taller buildings of the City Cluster.
121. It is acknowledged that there would be an increased sense of visual enclosure to the podium and so the architectural treatment of tiered massing stepping, significant urban greening and richly articulated façade of smaller components would ensure the addition to the foothills would be visually rich and distinctive. These architectural devices would also break up the perceived massing into components to mitigate any visual dominance. Other taller buildings are already visible from the podium and dwellings and as a further addition to the wider local townscape this would not be a visually incongruous insertion. The impact on microclimate and the amenity of residents and Petticoat Square as an outdoor space is addressed in the relevant sections of the report.
122. In the visual experiences from Devonshire Square, Culters Estate and Houndsditch the development would be seen against open sky and contrast with the foreground buildings of a finer urban scale but with a periphery of taller buildings within the wider setting.
123. In these more local townscape adjacencies, the form of the building would cascade from north to south surmounted by an innovative green crown and the lower shoulder to the north would serve to transition the scale to the finer urban grain in this fringe of the City. The additional devices of chamfered corners, and richness of the elevation in terms of detail including both bold vertical articulation and complex terraces and bays there would be a perceived slenderness from street level which would break down the overall structure into a series of smaller parts and proportions. The proposed development would effectively and successfully consolidate this lower northern edge and create a clear and architecturally distinctive bookend to the outer perimeter of the City Cluster and play a positive role in the transition to lower rise buildings in the north. As an architectural addition within the townscape the urban greening and striking architectural details would provide a new and intriguing visual delight appropriate to the diverse townscape context.

124. City Plan Policy S12 and London Plan Policy D9 require tall buildings to provide publicly accessible space at an elevated level. In this case due to the lower height of the building, proximity of residents and hemmed in nature of the site to the north the visual experience would be of limited value. The proposed public offer is therefore the ground floor community space and the increase in enhanced public realm which are addressed further in the report under the relevant sections.

Architectural approach

125. A holistic and inclusive approach underpins the proposals. Design drivers are context, sustainability, and urban greening principles to deliver a more outward facing style of architecture which externally expresses the internal functions and structure of the building. Architectural decisions have been fundamentally governed by an approach to constantly reduced carbon emissions as the scheme has been refined through the planning process.
126. This part of the City is not defined by any single architectural style or era, it is multi-layered, and the scheme responds to its transition location between city fringe and city cluster and therefore can support a building which is architecturally distinctive. The envelope has a defined hierarchy with tiered crown and raked base which creates a bold silhouette. The facades are highly articulated with multiple layers of detail with striking vertical and horizontal expressions.
127. The building has a sense of architectural drama achieved through form, articulation, and colour with soaring pale terracotta vertical folded piers, dropping dark art deco inspired metal bays and the anchoring to the ground by red muscular six storey internal Y props. These features define the building as a visual marker in longer views. But also provide a sense of intimacy in experiences closer to the building achieved through human scaled components such as the warehouse/apartment style metal bays active uses, and attention to crafted details, which are complex and refined. The reimagination of the existing public realm and extensive urban greening would be publicly visible are also integral to the architectural narrative to soften appearance, support wellness, biodiversity and make the building social and inviting.
128. The envelope and facades have varied treatments to respond to the differing contexts of city cluster and city fringe. The facade to the southeast is more formal and ordered and in comparison, the northeast and northwest are broken down with cascading terraces and corner balconies. The party wall to 133 Houndsditch restricts the architectural approach to ensure the elevation does not prejudice future development opportunities. The elevation would be visible in oblique views particularly from Houndsditch, Petticoat Square, Aldgate Square, White Kennet Street, and a simpler treatment is proposed but which still delivers design quality and references the rhythm of vertical terracotta piers and horizontal bands with inset windows to the staircases.
129. Urban greening is provided on corner balconies and cascading facade planters integrated to the northwest and northeast facades. This would

add visual delight internally and externally breaking up and softening the elevations. Additional moments of planting are provided via green walls to the upper pavilion, to screen the plant, to the larger roof terraces as part of the recessive tiers and at ground level in the form of a further green wall adjacent to the community use and public realm planting. The planting is integral to the architecture and intended to provide seasonal interest throughout the year. The mix would be 50/50 deciduous and evergreen to ensure year-round interest and variation in terms of look and feel. At application stage details of maintenance and access have been provided to ensure deliverability and this would be further controlled long term via a condition.

130. The sky pavilion at the uppermost floors is designed as two interlocking forms surrounded by green roof terraces which are surmounted by a minimal plant which is innovatively shrouded in green planting. As a grouping these create a unique silhouette as a crown which reinforces a sense of diminishing proportions and traditional hierarchy in longer views.
131. The four storeys of transparent raked envelope at ground level would deliver active frontages and provide visual connections to internal functions including incubator spaces at Level 1 and 2 and at ground the reception, retail pods and community space. The innerworkings of the building would be expressed externally. The raked primary structure of Y props enables the delivery of a column free public and would be a dramatic internal feature and this is celebrated soaring through the base of the building to six levels connecting externally to the colourful cleats and piers and other structural elements. This provides a visual logic to construction and the physicality of the building which would be perceived externally.
132. The active base would be defined by chamfered corner entrances into the office spaces and two dedicated cycle entrances in legible prominent locations. This space is a communal social interchange for arrivals on foot and on bicycle. The retail pods and the community use would provide another dimension of activity and be designed as animated bay insertions which would pick up on the architecture of the overall building through colour and attention to detail and would have an individual expression.
133. The loading bay has been thoughtfully designed and integrated into the building on Houndsditch. This would have an articulated building line refencing the bays elsewhere on the building and decorative perforated screen providing glimpses into a functional but colourful dynamic service area. Externally the area would be surrounded by greening and as a function the service bay would be celebrated rather than played down.
134. The proposals would integrate art projects across different areas of the building as both permanent and temporary interventions. These would be the subject of an art brief which would be embedded within the S106 and would require partnership working with local creatives and those from diverse backgrounds. Areas proposed include: the dropping bay

soffit treatment; screens and louvers; the green wall adjacent to the community use; community unit and the lorry lift interior.

135. A wider comprehensive lighting scheme is proposed for the public realm, interior of the lobby and podium area, balconies, and terraces. The design intentions are to minimise spillage, to be appropriate for various times of day; and to reduce energy consumption. The office lighting has been designed to be set back 1.5m from the façade. This would ensure the sophisticated architecture and spatial qualities of the development are appreciated after nightfall and impact to residents and biodiversity is minimised.

Conclusion

136. The site is considered appropriate for a tall building of this height and complies with City Plan Policy CS14 and emerging policy S12 and London Plan Policy D9. The cascading massing, dramatic yet refined design approach, materials, colour and intended quality would add a level of richness and visual interest to the local townscape and would support the emerging vibrancy of the wider area. The location is considered appropriate in terms of the city skyline, the character and amenity of the surroundings and in relation to existing tall buildings within the foothills and would provide opportunities for enhanced public realm. Final materials, details and collaborative art pieces would be the subject of conditions. The proposals comply Local Plan Policies CS10 and DM10.1. emerging City Plan Policy S8 and DE2 and London Plan D3. The proposals comply with those policies and with paragraph 130 and 132 of the NPPF.

Heritage Impacts

137. The proposals have been subject to detailed assessment of strategic and local views. The mass and form of the proposed development has been shaped by the visual constraints of designated views and sculpted and refined in response to townscape character and the setting of designated heritage assets
138. In total 57 viewpoint locations have been undertaken to assess impacts. There would be no harm to the Tower of London WHS, nearby listed buildings, conservation areas or non-designated heritage assets. Views of St Pauls Cathedral are not affected as the development would be concealed by existing taller foreground buildings and there would be no impact on the Fleet Street processional route.
139. Early pre-application discussions were undertaken with Historic Royal Palaces and Historic England and no objections have been received following formal consultation as part of this application.

Tower of London World Heritage Site – Impact on Outstanding Universal Value (OUV)

140. The seven overarching attributes of Outstanding Universal Value are contained in the Statement of Outstanding Universal Value, itself contained in the World Heritage Site (WHS) Management Plan, have underpinned this assessment, alongside the components contributing to

each attribute. It is considered that three attributes are of particular relevance to assessing the impact of the proposal: (i) an internationally famous monument, (ii) landmark siting and (iii) physical dominance of the White Tower.

141. The WHS Management Plan establishes a 'local setting area', an 'immediate setting' and a non-spatially defined 'wider setting'. The proposed building is not in the designated local setting (as identified in Figure 4 of the WHS Management Plan) but is in the wider setting. The Local Setting Study (section 7) identifies the main views and/or viewpoints to and from the Tower of London (ToL) which are deemed to exemplify the OUV and the components, with management guidance providing a baseline for assessing change. The representative views/viewpoints include a number of LVMF viewing locations, where relevant assessed here together.
142. The Management Plan acknowledges the influence of the Cluster of tall buildings in signifying the commercial centre, stating (at para 2.4.25) 'its visibility expresses the evolving political and cultural relationship between the Tower and the trading centre of the City of London'. It is also acknowledged that the relationship between the ToL and the Cluster is long-established, having existed for over half a century. It acknowledges that the Cluster forms a backdrop in views, including over buildings in the Inner Ward. In recognising the place of the Cluster in the wider setting it also acknowledges that it will intensify as a distinct and separate element to the ToL. The Management Plan, at para 7.3.27, states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS will continue to need to consider (i) their effect on the established Cluster (ii) the space between it and the ToL and (iii) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.
143. Whilst being proportionate, the assessment uses the framework in the Mayor's 'London's World Heritage Sites: Guidance on setting' SPG, which is based on the relevant ICOMOS guidance, including the impact tables at Appendix 3 and 4, in conclusion.
144. There are two views within the London View Management Framework which are critical in assessing the impact of the proposed building on the World Heritage Site, Tower Bridge (10A) and City Hall (25A) and these are considered in detail the Strategic View Section.

Strategic Views

LVMF 10A.1 – River Prospect, Tower Bridge (Upstream, North Bastion)

145. This is also identified as a Representative View in the Local Setting Study (View 9), whilst the impact here is also representative of the impact from Approach 14 (Tower Bridge).
146. The LVMF SPG states that this location enables the fine details and the layers of history of the Tower of London to be readily understood. The LVMF states that such understanding and appreciation is enhanced by the free sky space around the White Tower, and that where it has been

compromised its visual dominance has been devalued. It also states that the middle ground includes the varied elements of the City, rising behind the Tower, which includes prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as the spires of City churches and the Monument. It is also noted that the lantern and upper dome of St Paul's Cathedral can be seen, while other prominent buildings or structures in the background include the Cannon Street Station towers, BT Tower, Centre Point and the Tate Modern (para 182).

147. The visual management guidance anticipates the consolidation of the Cluster which it is deemed will add considerably to the character and stature of the view, and that any new skyline buildings must account for how they relate to skyline features (para 187). The guidance also states that landmarks which enable an appreciation of the scale and geography of London should not be obscured by inappropriate development in the foreground; that guidance applies, in particular, to the Monument (para 185). The visual management guidance also states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (para 186).
148. The proposal would not breach the skyline of the four towers of the White Tower or its castellations, in accordance with the relevant part of paragraph 186 of the visual management guidance, and the White Tower would continue to pre-emanate over the foreground, the whole ToL ensemble with a commanding presence on the River. In addition, wider landmarks, would not be obscured, and a relationship between these landmarks would remain undiluted, in accordance with paragraph 185 of the SPG. It is considered that under both baseline and cumulative scenarios the proposed building would not diminish, the appreciation of the dominance and pre-eminence of the ToL as a Strategically Important Landmark, or other identified landmarks and would preserve the appreciation of the OUV, in particular the attributes an internationally famous monument, landmark siting and the physical dominance of the White Tower, its integrity and authenticity. In this regard, the proposed building would not conflict with London Plan Policies D9 (e) and HC2, Local Plan Policy CS 13, draft City Plan Policy 2036 and guidance contained in the LVMF SPG and the LSS.

LVMF 25A.1-3 – Townscape View, Queen's Walk

149. This view is identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower. The focus of the view is the ToL, which is the sole Strategically Important Landmark, inclusive of a Protected Vista, the Landmark Viewing Corridor of which is focused on the White Tower, benefiting from a dynamically protected sky-backed silhouette between the three Assessment Points (25A.1-3). The Monument, Tower Bridge are also identified as landmarks and Port of London Authority is an identified building. The LVMF recognises the juxtaposition of built elements from a variety of eras as an aspect of the view (paragraph 413).
150. The Protected Vista and Silhouette would remain unaffected.

151. The proposed building would appear to the right of the City Cluster at a lower level integrated into the scale of the backdrop of the section between the City and the ToL WHS. At no point in the three Assessment viewpoints would the proposal appear near the White Tower. The proposal would not undermine the composition and characteristics of the view or those landmark elements including the Port of London Authority. The observer would continue to recognise and appreciate the Tower of London as the Strategically Important Landmark
152. The proposal would preserve the relevant attributes of OUV and those associated components. The proposal would not affect the foreground/midground of the views or the close relationship with the River Thames and principal setting from this iconic view (LVMF SPG para 416-417). It would not appear in the background, preserving the sky-backed Protected Silhouette between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct juxtaposing urban forms, in accordance with the visual management guidance (paragraphs 418-422) and guidance contained in the Local Setting Study.

Other World Heritage Site views

153. The Local Setting Study (Section 7) identifies Representative Views which are deemed to exemplify the OUV of the ToL. It provides an analysis of the character of these views as a baseline against which change can be assessed. In particular, the following were assessed View 1 (Inner Ward Scaffold Site) View 2 (Inner Curtain Wall, North) 4 (Inner Curtain Wall, South) and 5 (Byward Tower Entrance). These representative views have been tested and the proposed development would not be visible.

Dynamic Journey across Tower Bridge

154. The experience is identified in the Local Setting Study as Route 14 of the Approaches and Arrivals (Section 5), which acknowledges the overlap between these local views and the River Prospect at LVMF 10A.1. The identified aim is 'to create views in which the Tower of London is perceived as a riverside gateway lying at the edge of the City rather than 'lost in the City'; in which the scale of the White Tower is perceived as more prominent as than the building surrounding it; and in which the military architecture of the Tower and its defences can be appreciated'.
155. Viewpoints corresponding to this experience have been assessed in the submitted TBHVIA and addendums and in the three-dimensional digital model. From the sequence of viewpoints crossing Tower Bridge and onto the northern bridge approach the proposed building would largely be concealed, form part of the background urban layering or read as part of the low foothills to the main City Cluster. The uppermost parts of the building would appear fleetingly between the north and south bastions but as part of an existing backdrop of distant low developments and any impact would be distant, recessive, and negligible. In both baseline and cumulative scenarios, the White Tower is considered to retain its

prominence and the presence of the military architecture and defences of the WHS remain undimmed by the proposed building.

Other Views

156. In other views and approaches to the Tower identified in the Local Setting Study, the proposal would be peripheral, low level and indistinctive on the skyline and often screened by taller buildings and located some distance from the World Heritage Site.

Conclusion – Impact on Tower of London World Heritage Site:

157. The proposed building would preserve the ability to recognise and appreciate the ToL as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF. In all other views, including the relevant approach and representative views, it is considered in line with the WHS SPG that the scale of change in all instances it is deemed to be negligible to no impact. Overall, it is considered that the proposed building would not harm the attributes of the OUV or any of the components, authenticity or integrity of the WHS, preserving its significance. In line with Section 6 of the SPG the height, form and detailed design of the proposal has been amended to mitigate any potential impact, ensuring the proposal would read as part of the emerging low foothills stepping down from the main City cluster
158. The proposed building would therefore comply with London Plan Policies D9 (e), HC2 and HC3, HC4 which seeks to ensure the implementation of the LVMF. Local Plan Policies CS12 and CS13 of the City of London Local Plan and draft City Plan 2036 policies S11, S13 and HE3.

Wider London View Management Framework Impact:

159. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the Capital's character and identity at a strategic level.
160. The proposed development would not impact on any other LVMF views.

Conclusion – Summary of LVMF Impacts

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

Impact on significance and setting of listed buildings

162. There are several listed buildings near the site of the proposed building. Additionally, the scale and height of the proposed building would affect the settings of a few other listed buildings further afield. These are discussed in turn:

Bevis Marks Synagogue: grade I

Significance and contribution to setting

163. Synagogue of 1699-1701. This is the oldest synagogue in the country and survives to a remarkably little altered degree. It comprises an undemonstrative rectangular plan, of simple red brick with modest Portland stone classical dressings and tall pitched roof (originally clad in clay tile, now slate) behind a plain (rebuilt) parapet above cornice level. The principal elevation is off-street, the western elevation containing the main entrance and is symmetrically composed around a central axis door with good early Georgian door and architrave topped by an elliptical window. Otherwise, the building has two registers of windows, with the upper tier being large, round-arched windows to optimise daylight to the interior in what has always been a dense, built-up mid-block location. The building was constructed by Joseph Avis, a carpenter with links to the office of Sir Christopher Wren. Architecturally the building reflects the simple vernacular of contemporaneous City churches and nonconformist chapels. Inside, the plan form, fixtures and fittings are still of 1701. It is a single double-height volume, galleried on three sides, with a flat plaster ceiling from which hang seven original chandeliers, while much of the original woodwork interior and fittings are uniquely intact.
164. The building is located in an undemonstrative off-street location in an enclosed private courtyard, a situation representative of the long and complex history of Anglo-Jewry from formal expulsion in 1290 to a semi-formal acceptance during the Commonwealth resulting in re-settlement. This results in a very high level of historic significance to subsequent layers of Jewish communities in Britain down to the present day. It is the oldest surviving synagogue in England in continuous use since its construction, including through the Second World War, and is thus considered the synagogue in longest continuous use in Europe.
165. The synagogue retains its setting in a courtyard discreetly located off the main thoroughfare of Bevis Marks. It has no street presence but for its south-east elevation to Heneage Lane, a plain brick elevation pierced with three prominent round-arched windows. This forms the centrepiece of a characterful ensemble of brickwork elevations including the Rabbi's House fronting the north side of Heneage Lane. Otherwise, the principal approach to the synagogue is through a gateway in a modern building fronting Bevis Marks which provides access to the courtyard, a chevron of paved area flanking the synagogue's north-east and north-west elevations. From here the synagogue is seen hemmed in by other buildings of a similar scale and mostly of the same brickwork materiality, including the Rabbi's House which directly adjoins it to the east. The sense of an architecturally reserved and deliberately secluded setting continues to be legible and consequently the ensemble of the synagogue, its neighbouring buildings and the courtyard has high architectural and historic significance. Because of its informal, secluded setting, there are no formal viewpoints of the synagogue but rather a series of informal vistas and closeups.

166. In terms of the contribution of setting to significance, the wider modern setting includes a number of tall and very tall buildings, both existing and consented, some of which are clearly visible as prominent elements from the courtyard such as One Creechurch Place, No. 6 Bevis Marks and the Gherkin. All have visual impacts on upward views from within the courtyard and visually reinforce the appreciation the synagogue's secluded location in the heart of the modern City. Additional consented tall buildings, such as 100 Leadenhall Street, 40 Leadenhall and 1 Undershaft, 24 Bevis Marks House will add to this backdrop. Otherwise, there is an open sky setting over the synagogue, courtyard, and ancillary buildings.
167. While the contrast between the scale and character of the synagogue and its taller modern setting is very noticeable when deliberately looking upwards, the established character of this part of the City is one of dramatic juxtapositions of old and new and of taller buildings as a backdrop to historic buildings. This is a defining characteristic of the Cluster and foothills and the positive frisson between the historic and modern City is unique in townscape terms. In all courtyard views the synagogue holds the eye, is overwhelmingly prominent and is the defining focal point.
168. The close, immediate setting of the synagogue is preserved in the intimate courtyard in part resembles the setting at the time the synagogue was constructed and therefore makes a strong and defining contribution to its significance but the wider setting beyond has changed significantly and now has a fundamentally different modern character that makes no material contribution to the significance of the listed building.
169. The principal elements of setting which contribute to and accentuate an appreciation of significance are the immediate courtyard visual setting, accessed off Bevis Marks, and the setting on Heneage Lane and relationship with the Rabbi's House.

Impact Assessment:

170. The impact of the proposal would be indirect, via change in its much wider setting, rather than direct and physical. The development is some 85 m from the designated heritage asset located to the northwest. The core significance, architectural, evidential, historical, and communal, which is drawn from the authentic and tangible physical fabric which has played host to the spirit of the place, in particular the interior, would be undiluted and are very self-contained. No fabric would be lost, obscured or de-contextualised, but the ever-changing and dynamic wider townscape setting which provides the backdrop canvass to this, and which accentuates and makes even more remarkable the survival of this heritage, would change, but would not prevent those rich traditions from continuing.
171. In baseline experiences the upper levels of the proposed development would be partially experienced at a tangent including a glimpse of the green roof plant southwestern corner balconies and the west facing party

wall would be visible from within the courtyard in upward views northwards. The solidity and palette of colours would complement the courtyard setting. No views of the synagogue would be obscured as the buildings would be behind the viewer and neither the fabric of the synagogue nor the intimate courtyard would be altered. The visibility of the proposed development would change the composition of this outward northern facing view from the courtyard but the character of the wider setting to the synagogue of taller modern buildings would remain consistent.

172. The proposed building would add another modern form into the 360-degree backdrop experienced from within the courtyard. It would occupy a small portion of currently open sky space above the 1980s buildings which oversail the entrance gate to the courtyard. Due to the northerly location and distance from the designated heritage asset the proposed building would not interface directly with the synagogue building and therefore the proposed building would not mar the viewer's ability to appreciate the powerfully simple architectures of the synagogue or the courtyard buildings. From within the courtyard the synagogue would remain the prominent building and focal point.
173. Historically, part of the significance of the synagogue's setting is that it has always been a sanctuary of worship secluded and feeling a world away within a densely developed urban area. It is not considered that the proposed building would materially alter this perception. The proposed building would be a sophisticated piece of intricate architecture highly articulated with integral urban greening providing a high-quality backdrop distinct from the pre-eminent historic architecture of the synagogue and its courtyard and the 1980s buildings enclosing the north of the courtyard.
174. Consequently, in views from within the courtyard, the proposed building is not considered to cause harm to the significance or setting of the synagogue or the courtyard complex. The synagogue would remain the dominant presence in the glimpse views from the courtyard and the courtyard setting would retain its secluded intimate character and its contribution to setting and the significance of the synagogue would be preserved.
175. As the proposed development is to the north of the synagogue 85m away any diminution of internal lighting levels would be expected to be imperceptible with no material impact on worship or the appreciation of the historic significance of the intact interior and original fittings of the synagogue interior.
176. Taking into consideration the cumulative effects the consented 19 storey Bevis Marks House much closer to the synagogue approximately 25m to the northeast would conceal the proposed development in its entirety in views from the synagogue's courtyard.

Conclusion

177. It is considered that in visual, physical, and environmental terms, under both baseline and cumulative scenarios, the proposed building would

preserve the special architectural and historic interest and heritage significance of the synagogue and its setting.

The Aldgate School (listed as Sir John Cass School): grade II*

178. School of 1908, of red brick with classical stone detailing in the 'neo-Wren' manner. The associated playground and railings all positively contribute to the building's setting and its significance. To the east, the church's setting is further enhanced by the open space of Aldgate Square and the group relationship with St Botolph without Aldgate church; to the west, the school is framed by the finer urban grain and historic townscape of Mitre Street. The wider setting is otherwise characterised by modern commercial buildings of medium scale in the City, with the tall buildings of the City Cluster located to the west which do not have a relationship with heritage values of school and do not contribute to significance.
179. The upper parts of the proposed building would be seen in the wider backdrop of the school from Aldgate High Street beyond Aldgate Square. In baseline views the proposed development would integrate into the medium scale of foothills to the City Cluster as part of the existing modern context and would not be harmful to its setting or significance. In cumulative scenarios the proposed development with the consented 19 storey Bevis Marks House would consolidate the backdrop of lower taller buildings without altering the aspects of setting which contribute to heritage significance. The proposed building is not considered to harm the setting or significance of The Aldgate School and would form part of the neutral modern background buildings within the wider setting.

Holland House: grade II*

180. Offices of 1914-16, a rare example of the work of Dutch architect H.P. Berlage in Britain. Built for a Dutch shipping company, the building is a striking landmark, particularly in its use of grey-green faience materials and subtle nautical theming. The building's grade II* listing reflects its very high degree of both architectural and historic significance. It is unique in the city as an example of a skilfully crafted, fully faience-fronted building by a highly regarded Dutch architect whose work is rare in Britain, constructed in the middle of the First World War when building work had virtually ceased, employing novel forms of design such as steel-framing, a proto-atrium and as such pointed to the future of the office building. As well as the principal frontage, high architectural interest is found in the tiled interiors of the building at basement and ground floor levels, which survive as designed by Berlage to a high degree of intactness.
181. The backdrop to the listed building's principal elevation is open sky. The building remains part of a street block of a comparable scale and density to when it was originally constructed, and this immediate setting contributes to the building's significance. It originally formed part of the frontage to one of the narrowest streets in the City located opposite the former Baltic Exchange. It was designed to address the narrow street

and the lustrous, exquisite faience and projection of the closely spaced chamfered piers made the building appear solid in oblique views despite being highly glazed. Following damage caused by the 1992 IRA Bomb, the Baltic Exchange was demolished and replaced by the Gherkin in 2004, opening longer views of Holland House across the north-east and south-east corners of the new Gherkin piazza – but this was not how the building was originally designed to be seen and these views do not contribute significantly to the significance or appreciation of the listed building.

182. There would be no visual impact on the listed building as appreciated across the piazza at the base of the Gherkin, but the proposed development would be seen in oblique views of the listed building from Bury Street and would terminate views northward. This visual experience would be within the context of the taller modern buildings which do not currently contribute to the significance of the listed building. In cumulative scenarios the consented 19 storey Bevis Marks House would conceal the proposed development and would consolidate the backdrop of lower taller buildings without altering the aspects of setting which contribute to heritage significance. The proposed building is not considered to harm the setting or significance of Holland House.

Church of St Katharine Cree: grade I

183. Church of 1631 with a tower of c.1504; a rare example of a 'Laudian' church of the Caroline period; an exceedingly rare example of the early use, internally, of classical architectural motifs alongside perpendicular gothic features. The building is therefore of exceptional architectural and historic interest, with the enclosed churchyard to the north-east contributing to its significance.
184. The church is located on the south-west corner of the street block in a characterful immediate setting of masonry warehouse buildings and offices with terracotta decorative flourishes. These pre-eminently Victorian and Edwardian buildings form a cohesive townscape group, and this immediate historic setting contributes to the special architectural and historic interest and significance of the church; more widely, the church is seen in the context of larger modern buildings and the tall buildings of the City Cluster which do not contribute to the significance of the church, but which create an established, contrasting modern setting. The church is not listed as one of the City Churches with a Skyline Presence in Figure 11 of the City of London Protected Views SPD (2012).
185. The proposed building would appear in views of the church from Leadenhall terminating Creechurch Lane and would appear visibly distant and significantly lower than the church which would remain the focus of the view. The proposed development would also be seen in the context of the tall buildings on the eastern edge of the City Cluster. The proposed development would change the wider setting of the church but distinct from the church and its more historic setting. The legibility of the medieval tower within the streetscape of Leadenhall and the elements of setting which contribute to setting and appreciation of significance would not be altered. In cumulative scenarios the proposed development 19

storey Bevis Marks House would conceal the proposed development and would consolidate the backdrop of lower taller buildings also without altering the aspects of setting which contribute to heritage significance. The proposed building is not considered to harm the setting or significance of the Church of St Katherine Cree.

Church of St Botolph Aldgate: grade I (and associated grade II listed street furniture)

186. Church of 1744, of stock brick with classical stone detailing and a distinctive obelisk tower. The churchyard, railings and associated drinking fountain and police call box all positively contribute to the building's setting and significance and form a boundary which reinforces its visual prominence in the townscape. The church's setting is further enhanced by the open space of Aldgate Square to the west and the group relationship with the Aldgate School. The setting is otherwise characterised by modern commercial buildings of medium scale in the City and Tower Hamlets, with the tall buildings of the Cluster set some distance away to the west which do not contribute to the significance of the listed building but have created a now established contrasting modern setting.
187. The landmark spire is identified as contributing to City's skyline in the CoL Protected Views SPD. The proposed building would be glimpsed beyond the church in relation to taller background buildings to the west the proposed development would comfortably consolidating the multi-layered backdrop of the church seen from Minories and Aldgate Square without appearing dominant and the spire would remain visually prominent and undiminished. The tall modern character of the wider setting to the west of the church would not be altered and the ability to appreciate the church's heritage significance would not be affected. In cumulative scenarios the proposed development with 19 storey Bevis Marks House would consolidate the backdrop of lower taller buildings without altering the aspects of setting which contribute to heritage significance. The proposed building is not considered to harm the setting or significance of the Church of St Botolph Aldgate.

Church of St Botolph Bishopsgate: grade II*

188. The origins of the church are 12th century, but it was rebuilt 1725-29 and extensively restored following bomb damage 1947-8 and 1990s. The building has special architectural and historic interest for its age and rarity and its association with both James Gould and George Dance the Elder renowned Georgian architects. The church has strong townscape and landmark presence and is identified as a building with City Church with skyline presence in CoL SPD Protected Views SPD.
189. The setting is varied and contrasting and characterised by Bishopsgate Conservation Area and the old churchyard to the south. These positively relate to the historic finer urban grain in which the church once existed and define a formal perimeter reinforce the buildings status. The wider setting is defined by the tall buildings of the City Cluster particularly Heron Tower and 1 Bishopsgate Plaza, 100 Bishopsgate and 99

Bishopsgate which do not contribute to the significance of the church, but which create an established, contrasting modern setting.

190. The proposed building would have limited juxtapositions with the listed church although there would be visibility from Bishopsgate in front of church and in aligned views from the churchyard looking east but this visual experienced would be within the context of Heron tower and 1 Bishopsgate Plaza. The tall modern character of the wider setting to the east of the listed building would not be altered. In baseline and cumulative scenarios including with 1 Undershaft there would be a consolidation of the established modern tall building setting of the building without diminishing the ability to appreciate the heritage significance of the listed building. The proposed building is not considered to harm the setting or significance of the Church of St Botolph Aldgate.
191. The proposed building is not considered to harm the setting or significance of the Church of St Botolph Bishopsgate.

Port of London Authority's Warehouses and boundary walls to Middlesex Street and New Street: grade II

192. The merchants of the East India Company began trading in 1600 and by the 1820s they occupied large storage warehouses to the northeast of the city adjacent to the late 17th century Devonshire Square. The site was redeveloped in 1978-82 with 4 out of 7 of the warehouses preserved as part of the development. The surviving listed warehouses date from the late 18th century and form a large irregular group of plainly detailed 6 storey buildings of pinkish/yellow brick with Portland stone dressings around enclosed and partially enclosed courtyards. The block facing Devonshire Square has an arcaded base and stone banding. The buildings have architectural and historic interest particularly for their association with East India Company and with the Port of London Authority. The warehouses are early examples of purpose-built warehouses and express the standards of architecture that applied to this typology of architecture at the time with formal classical compositions. T
193. The setting of these listed structures is as a series of complex of warehouses and smaller domestic buildings which have visual and functional relationships with one another and form an irregular but cohesive townscape group contained within a defined boundary with distinct interconnecting spaces. The spaces between the buildings are historic and central to the significance of the former trading and industrial past including Central Courtyard and The Avenue. The 1980s remodelled and rebuilt part of the Cutlers Gardens Estate by Richard Seifert are integral to setting and contribute to the historic evolution and so significance of the wider campus of listed buildings
194. To the west is the Georgian planned Devonshire Square, historic terraced buildings and the southern part of the Bishopsgate Conservation Area and New Street. These elements of setting relate to the significance of the warehouses and as part of the established urban

grain and the evolution of the area as a place of trading and support evidential, architectural, and historic values.

195. The broader setting is varied and does not contribute to significance comprising to the south modern midrise commercial buildings including the proposed development site and beyond this are the taller buildings of the City Cluster. To the east is Harrow Place and Middlesex Street Estate 1965-1975 with Petticoat Tower.
196. The proposed development would not impact on the historic visual or functional relationships between the warehouses as a group or affect the wider setting of Devonshire Square or Bishopsgate Conservation Area. The development would have a significant background visual presence as experienced in southerly views from The Avenue and Central Courtyard complex and experienced from Devonshire Square to the west. The juxtaposition would be striking but not adverse and the stepped massing, solidity of materials, warehouse metal bays, articulation and urban greening would comfortably transition the change in scale from 6 storey warehouses to the 18/24 cascading storey development. The public realm and the ground floor functions would add vibrancy to the existing commercial character of the warehouses and semi-public spaces between the buildings.
197. The proposed development would also be experienced in the wider setting of the existing taller buildings which form a modern backdrop. The ability to appreciate the historic formal composition and classical details of the warehouses and the boundary wall and the cohesive grouping and inter- relationship between the blocks would not be diminished. The elements of setting that contribute to the warehouses setting would not be altered. In terms of cumulative scenarios 1 Undershaft and 100 Leadenhall Street would increase the visual impact of the southerly setting of the listed buildings consolidating the taller buildings of the City Cluster and increasing its scale. There would be change to the wider setting with the proposed development, but this would not diminish the impact on the ability to appreciate heritage significance. The proposed building is not considered to harm the setting or significance of the Port of London Authority's Warehouses and boundary walls to Middlesex Street and New Street.

House to east of entrance to Port of London Authority's Warehouses: Grade II

198. These 3 storeys plus basement is in yellow brick with painted dressing and dates from 1806 as part of the East India Company warehouse development and this has historic and architectural interest. Together with the pair of houses opposite the building bookends the entrance into the warehouse complex and have historic and architectural interest.
199. The setting of this house is the wider complex of warehouses and other domestic buildings which have visual and functional relationships with one another and form an irregular but cohesive townscape group contained within a defined boundary with distinct interconnecting spaces. The spaces between the house and warehouses buildings are historic and central to the significance of the former trading and industrial past

including Central Courtyard and The Avenue. The historic piers flanking the entrance to The Avenue are central to the setting. The 1980s remodelled and rebuilt part of the Cutlers Gardens Estate are integral to setting and contribute to the historic evolution and so significance of the wider campus of listed buildings

200. To the west is the Georgian planned Devonshire Square and southern part of the Bishopsgate Conservation Area and New Street. These elements of setting relate to the significance of the warehouses and as part of the established urban grain and the evolution of the area as a place of trading and support evidential, architectural, and historic values.
201. The broader setting is varied and does not contribute to significance comprising to the south modern midrise commercial buildings including the proposed development site and beyond this are the taller buildings of the City Cluster. To the east is Harrow Place and Middlesex Street Estate 1965-1975 with Petticoat Tower.
202. The proposed development would not impact on the historic visual or functional relationships between the domestic house and the wider grouping of listed buildings as a group or affect the wider setting of Devonshire Square or Bishopsgate Conservation Area. The development would have a significant background visual presence as experienced in southerly views from The Avenue and Central Courtyard of the Devonshire Square complex. The juxtaposition would be striking but not adverse and the stepped massing, solidity of materials, warehouse metal bays, articulation and urban greening would comfortably transition the change in scale from 3 storey building to the 18/24 cascading storey development. The public realm and the ground floor functions would add vibrancy to the existing commercial character of the warehouses and semi-public spaces between the buildings.
203. The proposed development would also be experienced in the wider setting of the existing taller buildings which form a modern backdrop. The ability to appreciate the historic formal composition and classical details of the warehouse and the boundary wall and the cohesive grouping would not be diminished. The elements of setting that contribute to the warehouses setting would not be altered. In terms of cumulative scenarios 1 Undershaft and 100 Leadenhall Street would increase the visual impact of the southerly setting of the listed buildings consolidating the taller buildings of the City Cluster and increasing its scale. There would be change to the wider setting with the proposed development, but this would not diminish the impact on the ability to appreciate heritage significance. The proposed building is not considered to harm the setting or significance of House to east of entrance to Port of London Authority's Warehouses.

Pair of houses at north of entrance to Port of London Authority's Warehouses:
Grade II

204. These houses date from 1786-7 as part of the East India Company warehouse development and with the east entrances house bookend the entrance into the warehouse complex and have historic and architectural

interest. Together with the east entrance house the buildings bookend the entrance into the warehouse complex and have historic and architectural interest.

205. The setting of this house is the wider complex of warehouses and other domestic buildings which have visual and functional relationships with one another and form an irregular but cohesive townscape group contained within a defined boundary with distinct interconnecting spaces. The spaces between the house and warehouses buildings are historic and central to the significance of the former trading and industrial past including Central Courtyard and The Avenue. The historic piers flanking the entrance to The Avenue are central to the setting. The 1980s remodelled and rebuilt part of the Cutlers Gardens Estate are integral to setting and contribute to the historic evolution and so significance of the wider campus of listed buildings
206. To the west is the Georgian planned Devonshire Square and southern part of the Bishopsgate Conservation Area and New Street. These elements of setting relate to the significance of the warehouses and as part of the established urban grain and the evolution of the area as a place of trading and support evidential, architectural, and historic values.
207. The broader setting is varied and does not contribute to significance comprising to the south modern midrise commercial buildings including the proposed development site and beyond this are the taller buildings of the City Cluster. To the east is Harrow Place and Middlesex Street Estate 1965-1975 with Petticoat Tower.
208. The proposed development would not impact on the historic visual or functional relationships between the domestic house and the wider grouping of listed buildings as a group or affect the wider setting of Devonshire Square or Bishopsgate Conservation Area. The development would have a significant background visual presence as experienced in southerly views from The Avenue and Central Courtyard of the Devonshire Square complex. The juxtaposition would be striking but not adverse and the stepped massing, solidity of materials, warehouse metal bays, articulation and urban greening would comfortably transition the change in scale from 3 storey buildings to the 18/24 cascading storey development. The public realm and the ground floor functions would add vibrancy to the existing commercial character of the warehouses and semi-public spaces between the buildings.
209. The proposed development would also be experienced in the wider setting of the existing taller buildings which form a modern backdrop. The ability to appreciate the historic formal composition and classical details of the warehouse and the boundary wall and the cohesive grouping would not be diminished. The elements of setting that contribute to the warehouses setting would not be altered. In terms of cumulative scenarios 1 Undershaft and 100 Leadenhall Street would increase the visual impact of the southerly setting of the listed buildings consolidating the taller buildings of the City Cluster and increasing its scale. There would be change to the wider setting with the proposed development, but this would not diminish the impact on the ability to

appreciate heritage significance. The proposed building is not considered to harm the setting or significance of the pair of houses at north of entrance to Port of London Authority's Warehouses.

Gate piers to entrance to Port of London Authority's Warehouses: Grade II

- 210. These are plain gate piers of Portland Stone dating from 1806 and have historic and architectural interest and are intrinsic to the wider Devonshire Square warehouse and domestic buildings now forming part of Cutlers Garden Estate.
- 211. The proposed development would not impact on the historic, visual, or functional relationships between the gate piers, townhouses and the warehouses as a group or affect the wider setting of Devonshire Square or Bishopsgate conservation Area. The development would be a significant background visual presence as experienced in southerly views from The Avenue and Central Courtyard of the Devonshire Square complex. The juxtaposition would be striking but not adverse and the stepped massing, solidity of materials, warehouse metal bays, articulation and urban greening would comfortably transition the change into the finer urban grain of the warehouse complex.
- 212. There would be change to wider setting with these baseline and cumulative scenario but there would be no resulting impact on the ability to appreciate heritage significance. The proposed building is not considered to harm the setting or significance of the Gate piers to entrance to Port of London Authority's Warehouses.

Nos 12 and 13 Devonshire Square: grade II

- 213. These substantial houses are the oldest in Devonshire Square and occupy the northeast corner. Each house is 4 storeys plus basement and are yellow brick and 4 windows wide. They have historic and architectural interest for their age and rarity and make an important contribution to the townscape and Devonshire Square as a Georgian historic planned square. These are good examples of mid Georgian houses.
- 214. The setting is varied and elements which contribute are the Bishopsgate Conservation Area in which the buildings are located. The east is dominated by the historic warehouse buildings now the Cutlers Garden Estate complex. The west and north are more residential and modest in scale also consistent with the listed buildings. These elements in terms of urban grain, alignment, and relationship to historic street patterns all reinforce the historic and architectural values of the listed buildings. On the south side is the post war substation designed to be sympathetic to the square. The square itself contributes to the appreciation of the listed buildings significance and provides evidence of the original formal layout. There is a clear wider modern setting of City Cluster as well as taller buildings to northeast and the Middlesex Estate which are part of the established setting by do not contribute to significance.
- 215. The proposed development would not be visible from this northeast corner of Devonshire Square and therefore the most significant views of

the listed pair looking north across the square in the context of the formal layout and historic character of Devonshire Square. Due to the location of the development, there would be no interface with the listed buildings as the development would be behind the viewing experience and not visible and therefore significance would not be diminished.

216. The impact of the proposed building in baseline and cumulative scenarios due to the locations would not result in any impact or effect on the ability to appreciate heritage significance. The proposed building is not considered to harm the setting or significance of the 12 and 13 Devonshire Square.

Other listed buildings

217. The impact of the proposal on the settings of the listed buildings has been assessed in the THVIA including St Helens Bishopsgate (grade I); Guild Church of St Ethelburga the Virgin; (grade I); Wall to the rear of Nos 14-18 Devonshire Row (grade II); and Shield House, New Street (grade II) and 38 St Mary Axe (grade II). The settings and the contribution these makes to significance of these listed buildings, would not be adversely affected by the proposals due to: the relative distance of the proposal where it would not appear unduly prominent; the presence of other tall buildings that characterise the existing emerging settings; and existing built fabric blocking the view of the proposed development in the backdrop. The THVIA assessment that the effect on significance and setting would be neutral or minor is concurred with, and the proposed development would not harm the setting or the contribution that the setting makes to the significance of these listed buildings.

Impact on significance and setting of Conservation Areas

Bishopsgate Conservation Area

218. This lies to the northeast of the City and includes Liverpool Street. It is characterised by Bishopsgate as the major route with streets leading east and which are developed by smaller scale buildings of Victorian, Edwardian, and Georgian periods. The area has a dense urban grain formed by a network of historic streets, lanes and alleys overlaid with Georgian town planning and Victorian railway infrastructure. It is a distinct area in terms of buildings scale and diversity of use with contrasting large scale office buildings to the north, south and west. The northern half of Bishopsgate in the conservation area are framed by Broadgate Estate.
219. The proposed development would be impactful on the Bishopsgate Conservation Area which is close to the site particularly from Devonshire Square and its southern easterly setting but would also be glimpsed from Liverpool Street, from the entrance of Liverpool Street Station and from Bishopsgate to the north of the station. The city cluster is within the periphery and backdrop of the southern aspect of the Square but the proposed development would bring the northerly fringe closer to the conservation area.

220. From Devonshire Square the scale of the proposed development would be seen in relation to existing tall building in the city cluster appearing at an equivalent height beyond the square in its close setting to the south. The development would not make a fundamental change to the character and quality of the existing established southerly setting which is distinctly taller and modern. The proposed development would consolidate the lower northern edge with a book end building and would reinforce the dramatic contrasts of old and new which characterise the city and the setting of the Conservation Area. The legibility of the formal historic layout of Devonshire Square and the fine urban grain would be unaffected, legible and preserved. Because of its established close southerly setting visibility of a new tall building is not considered to be inherently harmful to the appreciation of the heritage significance of this part of the conservation area. In all other glimpses the visual impact to setting would be negligible integrated into an urban layering experience.
221. The character and appearance and quality of the visual setting of this part of the conservation area would be preserved. In both baseline and cumulative scenarios, the development consolidates the tall building backdrop and wider setting and there would be no impact on the ability to appreciate the heritage significance of this part of the conservation area. The proposed enhancements to public realm would add vibrancy to this fringe of the Conservation Area or its setting.

St Helens Place Conservation Area

222. This is a small and tightly defined Conservation Area on the east side of Bishopsgate located to the southwest of the site. The Conservation Area is enclosed by Bishopsgate to the west, Church of St Helen Bishopsgate to the south and the property boundaries of St Helen's Place to the north and east. The conservation areas provide a close setting for St Helen and Guild Church of St Ethelburga the Virgin which define the character and appearance. St Helen is the only survivor of the intricate layout of medieval spaces and alleys which connected Bishopsgate and St Mary Axe. The privately owned St Helen's Place is the centrepiece as a planned enclave of twentieth century buildings which are secluded and dignified. The setting of the conservation area is defined by tall buildings in all directions which do not detract from the intimate, quiet and distinctive character and appearance of the Conservation Area.
223. The proposed development would have a negligible impact and it would be almost entirely concealed by foreground buildings. The character and quality of the visual setting of the conservation area would be preserved in both baseline and cumulative scenarios there would be no impact on the ability to appreciate the heritage significance of the designated heritage asset or its setting.

Wentworth Street Conservation Area

224. This is within the London Borough of Tower Hamlets. It is located to the northeast of the site. It is an area with a fine urban grain which special architectural and historic interest due to its rich history dating from 19th

century. The area has a mediaeval street pattern of yards and alleys which is still evident. The area is characterised by markets and associations with the clothing industry and wave of immigration which make it a culturally diverse part of London.

- 225. The south-eastern setting of the conservation is defined by the backdrop of the change in scale between the 19th century street network and the distant very tall buildings of the city and the foothills to the city cluster.
- 226. In views from Wentworth Street and Cobb Street the proposed development would bring the northern edge of the foothills closer to the Conservation Area and partly conceal taller buildings beyond. The distinct cascading northeast elevation and green crown would step the scale down from south to north. The well-articulated distinctive form would enhance the character and quality of this northern edge of the city cluster and foothills in approaches through the conservation area.
- 227. The character and quality of the visual setting of the conservation area would be preserved in both baseline and cumulative scenarios which would consolidate the city cluster and tall building backdrop and wider setting and there would be no impact on the ability to appreciate the heritage significance of the designated heritage asset or its setting.
- 228. No objections have been received from the London Borough of Tower Hamlets.

Non-designated heritage assets

The Rabbi's House

- 229. The Rabbi's House adjoins Bevis Marks synagogue to the southeast and presents a simple frontage to the synagogue courtyard of stock brickwork and stone dressings. Its more architecturally significant elevation is that to Heneage Lane, of red brick and Mansfield stone dressings incorporating Tudor inspired detailing. It possesses a high level of historical significance for its associations with the synagogue and a moderate level of architectural significance for its well-composed, high-quality elevations. The building's setting as part of the synagogue complex contributes highly to its significance. The proposed development due the distance, height and location would not interface with the non-designated heritage asset and there would be no impact on the ability to appreciate significance.

Devonshire Square

- 230. This is important in terms of historic town planning being the sole historic planned square in the Bishopsgate Conservation Area, its formal layout is in marked contrast to the irregular parts of many other parts of the area. The square was originally developed in the late 17th century as part of the site of Earl of Devonshire's House. The square itself has been remodelled but as a space it has distinct historic references reflecting the former historic layout. The setting still has a strong sense of enclosure on three sides which frame a rectangular open space and includes a number of listed buildings 12 and 13 Devonshire Square and part of the imposing Cutler Street Port of Authority Warehouses complex. This has

a key amenity value as a relatively quiet place for people to sit in away from the bustle and noise of Bishopsgate. The Square opens up on its eastern side on the boundary due to the Metropolitan line under the square and the destruction of the south side of the square in WWII.

- 231. The southwest is defined by the midrise Premier Place and taller buildings that are experience beyond. This wider setting does not contribute to the historic elements of the square or its significance.
- 232. The development would be impactful and visible beyond Premier Place and higher than neighbouring building and those in the immediate context. The experience would vary in the space depending on positioning. The form of the top of the building would step down from south to north and this cascading silhouette would be a strong visual backdrop to the setting of the non-designated heritage asset. The taller element would read in relation to other buildings within the foothills and taller buildings within the cluster and therefore there would not be a fundamental change to the setting of the square but within the wider taller building context. The cascading form, urban greening and intricate detailing of the architecture and references to the warehouse typology would provide visual interest and vibrancy and present a sophisticated building form. The more solid materiality of terracotta would contrast with the glassy building which characterises the City Cluster. In terms of form and tiered massing the development would successfully mediate the change in scale required by the contrasting city contexts.
- 233. The development is some distance from the non-designated heritage asset. The setting of the southeast context would change but the overall significance of the space and its important historic and evidential values would not be diminished and would remain unchanged.

1 Devonshire Square

- 234. The former Bank of Ceylon is a red brick former warehouse on the corner with Devonshire Row with strong painted stone base and brickwork above four storeys plus basement and mansard roof characterised by vertical windows, neoclassical proportions and, cornice line and lightwell with railings. Its significance lies in its contribution to the wider historic terrace buildings enclosing the west and northern aspects of the Georgian planned historic Devonshire Square. The location and orientation of the proposed development located to the southeast of the building behind the viewer and therefore would not impact on the ability to appreciate significance.

2 Devonshire Square

- 235. This is a neo-Georgian building dating 1926 with the character of a townhouse, it is of red brownish red brick with chunky stone detailing including a large portico, rusticated base, window surrounds cornice and balustrade to the lightwell. Its significance lies in its contribution with other historic terrace buildings enclosing the west and northern aspects of the Georgian planned historic Devonshire Square. The location and orientation of the proposed development located to the southeast of the

building behind the viewer and therefore not impact on the ability to appreciate significance.

15 Devonshire Square

236. This is a Queen Anne style red brick building with substantial stone features and is eclectic in appearance. The facade is irregularly arranged with different designs for windows on each floor a tall wide entrance a door with projecting hood an egg and dart cornice supported on brackets with pilasters. Its significance lies in its contribution with other historic terrace buildings enclosing the west and northern aspects of the Georgian planned historic square. The location and orientation of the proposed development located to the southeast of the building behind the viewer and therefore would not impact on the ability to appreciate significance

Conclusion on Heritage Impact:

237. Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).
238. Paragraph 203 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset
239. Overall, the proposed development would preserve the special interest and settings of designated and non-designated heritage assets in the locality and comply with the NPPF, and relevant policies in the London Plan and Local Plan.

Other Strategic Views (Local)

The Monument to the Great Fire of London

240. The proposed building would fall outside the identified viewing cones from the Monument and would not harm or conceal views of important heritage assets. The proposed building would be completely obscured by taller buildings in the foreground in views from the north of the Monument viewing gallery. The proposed building would not harm or obstruct important views of the Monument from afar or in local views.
241. The proposal would not be in the 'Immediate Setting' of the Monument as defined in the Protected Views SPD and would be peripheral to wider views along street axes setting. The proposals would have a neutral impact on its setting in baseline and cumulative scenarios, causing no conflict with the Protected Views SPD guidance.

Fleet Street/Ludgate Hill: The Processional Approach to St Paul's Cathedral

242. The proposed building would not be visible from the Processional Approach to St Paul's Cathedral on Fleet Street, Ludgate Circus or

Ludgate Hill. It would leave this kinetic townscape experience unaffected, in accordance with Local Plan Policy CS13 and draft City Plan Policy S13 and in guidance contained within the Protected Views SPD.

St Paul's Cathedral

- 243. The proposed building would be not visible from the Stone and Golden Galleries of St Paul's Cathedral. The Protected Views SPD seeks special attention be paid to the roofscape surrounding the Cathedral.
- 244. From here, the proposed building would be concealed behind the existing City Cluster and no harm to this view would arise.

Views from other publicly accessible elevated viewing areas

- 245. Public elevated views from the upper storeys of buildings, which because they are freely available to the public have significant public benefits. Such areas are increasing in number and are proving to be highly popular and much-visited areas of elevated public realm, offering exceptional pan-city views.
- 246. Due to its height, the proposed building would not be visible from the free public terraces at Tate Modern, One New Change, 120 Fenchurch Street, 22 Bishopsgate. Where the proposals would be visible for example 1 Undershaft and 100 Leadenhall Street the largely planted roof of the fifth elevation would appear as a positive architectural addition to the urban layers at a significant lower level.

Other Local views

- 247. As a lower tall building, the development would be glimpsed in other views in the City and in the wider area of London. These have been assessed. The proposed building has been appropriately designed in relation to its surroundings and its quality design and appropriate massing would not detract from the visual amenity of other townscape views. The proposed building protects significant views of important buildings, townscape, riverscape and skylines and would not result in harm to the views identified in the Townscape, Built Heritage and Visual Impact Assessment and the settings and significance of the heritage assets and landmark buildings featured within these views would not be harmed by the proposals.

Public Realm

- 248. Local Plan policies DM16.2 will only permit the loss of a pedestrian route where an alternative pedestrian public route of at least the equivalent is provided. City Plan Policy DM10.1, DM19.1 and emerging City plan Policy HL1, DE3, London Plan Policy D8 all require high quality public realm and increased urban greening.
- 249. Currently, the existing public realm is poor quality, gloomy and is a place to walk through rather than linger. There are no active frontages, ill-defined entrances, the existing building over sails just 3.55m above narrow pavements and there is no soft landscaping or places to sit.

250. Clothier Street is existing highway in the centre of the site and this is a refuse and service yard cul de sac as well as pedestrian route. Private areas within Clothier Street are used for car parking. The public highway terminates at a discreet pedestrian passage, connecting to Cutler Street West across privately maintained permissive path. Clothier Street includes dead corners and recesses and is not a meaningful or pleasant public space. Clothier Street experiences much lower footfall than the surrounding streets (in the 2019 baseline PM peak hour flows are; Cutler Street N: 1746, Cutler Street W: 1248, Houndsditch: 1836, Clothier Street: 42; in a future baseline scenario (without development) PM peak hour flows are expected to be; Cutler Street N: 2100, Cutler Street W: 1350, Houndsditch: 2850, Clothier Street: 50)
251. The application proposes an increase in quantity and quality of public realm. The perimeter spaces wrapping around the building would be outward facing, attractive and accessible spaces. There would be a net gain of approximately 173sqm of new public realm and 27sqm of public highway land.
252. Pedestrian comfort levels would be enhanced, with pavements widened to provide a 2m clear footways to facilitate movement around the site with additional space extending up to between 3.9m and 7.4m to provide space to dwell. This would secure at least "A-" PCL-rated pedestrian routes along Houndsditch Street, Cutler Street (West) and Cutler Street (North). This would support and enhance permeability and pedestrian movement along important strategic routes and aligns with the City of London's Eastern Cluster Vision. The development would enhance an existing network of streets and desire lines and in particular the north/south route through this part of the city from St Mary Axe and on to Devonshire Square, Harrow Place and Petticoat Lane Market. The widened pavements also allows opportunities for: realigning the street edges; small street trees; planting; and seating as well as incidental pop up activity. The thermal and pedestrian comfort of these spaces to enjoy sitting and lingering this is addressed in the relevant sections of this report. Importantly, the new public realm on Cutler Street will improve visual and pedestrian connectivity between the City Cluster and the communities and areas (including Petticoat Lane market) to the north.
253. The proposed set back of the building line and column free raked base would increase the width of Cutler Street (west) from 7.5m to 11.5m and lift the overhang of the building to 7m. The existing building oversails approximately 100 m² of the narrow footways on Houndsditch, Cutler Street West and Cutler Street North and 90sqm over Clothier Street. The proposed development would oversail 108m² of existing highway and 380m² of land proposed to be dedicated as public highway. This increase needs to be assessed qualitatively. The raked based and increased publicly accessible public realm would increase sunlight to ground and create a more open aspect and reduce the existing sense of enclosure particularly to Cutler Street (West)
254. Further enhancements to the overall street environment as a user include raised table to Cutler Street (West) and finishes to encourage

traffic calming. Servicing would be consolidated and contained within the new development, reducing vehicle numbers travelling to and from the site and using the kerb side.

255. The enhanced public realm would have a clear connection with the architecture of the building and as a place to walk through and spend time would be comfortable, inviting, attractive and inclusive and enable opportunities for social interaction. The base of the building would integrate 46 high and low permanent seating spaces interspersed with a green edge of planters positioned playfully to create intimacy and more sheltered experiences for users as well reinforcing a focus on the location of entrances on the corners and to the community use to the north. Materials comprise terrazzo and York stone and are designed to complement the City of London palette. The planters are designed as hyper flexible features integrating infrastructure to enable permanent and temporary installations within the niches to support pop up market stalls or gazebos for events which could further add to vibrancy of the street or complement the proposed retail offer as well as improve the connections through to and support the vibrancy of Petticoat Market. Opportunities for free storage space has been identified on site within the development at lower ground level for both traders of Petticoat Lane Market and the potential pop ups and kiosks along Cutler Street West. This will be detailed within the S106 and would be subject to demand and include locations, capacity, and hours of access.
256. The integrated planting to the ground floor public realm would be designed to more domestic rather than corporate and would be seasonal and selected to respond to specific microclimate conditions. Ginkgo trees are the proposed species of street tree on Cutler Street North, Cutler Street West and Houndsditch. The trees would sit in the middle of the new footway due to the presence of a number of services below the existing footway. The impact of their location on pedestrian movement has been assessed and is considered acceptable, further detail can be found in the Transport and Highways section of this report.
257. These trees would be maintained by the applicant, the management of which would be secured through the S106 agreement. The proposed street trees and their maintenance arrangement has been discussed and agreed with officers in the Open Spaces division.
258. The proposed street lighting is designed in accordance with the Lighting Vision for the City of London. The existing two streetlights and public realm lighting would be integrated into the building soffits and facade allowing for a clutter free public realm. The street lighting would be managed by the City Central Management System.
259. The final details of the public realm including planting, materials, lighting, and management would be subject to conditions, S106 and S278. The overall vision for the public realm and the dynamic with the base of the building would positively transform the existing public spaces in terms of experience and is considered to be significantly superior to the existing Clothier Street and public realm. The overall outcome would cultivate a vibrant and inclusive space which could be used flexibly with

opportunities for kiosks and pop up activities and would support the recovery aspirations for City. These elements of the proposal represent good place making and there would be gains quantitatively and qualitatively compliant with the NPPF design policies, London Plan policies, Local Plan policies, Draft City Plan policies, and the City Public Realm SPD.

Suicide Prevention

260. Suicide prevention has been considered as part of the application. A condition is recommended requiring further details of measures to prevent jumping or falling from the development.

Cultural Strategy

261. Local Plan policies CS11 and DM11.2 and draft City Plan 2036 policy S6 encourage new cultural experiences and art works and requires major development to provide a Cultural Plan. The City of London Cultural Policy seeks to improve the City's public realm, open spaces and gardens to make them more open, distinct, welcoming and culturally vibrant. The site is located close to the south-eastern edge of the City and the proposal incorporates several elements which will improve the cultural enjoyment of the site.
262. The Applicant has submitted a draft Cultural Plan in accordance with draft City Plan Policy S6 and this includes various components: community space; flexible public realm; affordable retail unit; affordable incubator space; and cultural commissions.
263. A dedicated 238sq.m community space is proposed and the initial proposal for this space is a cultural and social platform. The "Growing Community" proposals have been based on research, creative development, and community consultation. Further details of the consultation are contained within the Statement of Community Engagement within the report but has included local community groups, key stakeholders in the City of London and in neighbouring Boroughs. The proposals would offer a new urban green hub supporting local community green initiatives including local gardening opportunities and landscaping services. The hub space would occupy a prominent position on the northeast corner of the site at a nodal point and be outward facing to Middlesex Estate. Urban greening underpins the overall proposals, and the space and functions would complement existing neighbourhood activity and drive forward environmental agendas.
264. The space would be a dedicated two level community space within the building off Cutler Street (North) with generous ground floor frontage and fully accessed at street level creating a space for curated programmes focussed on gardening and green initiatives celebrating community projects designed for local groups including schools and charities for free. This may incorporate a green café and gardeners store uses adding to the activation of the proposed public realm.
265. The community space would include a stair, accessible wc, kitchenette and platform lift. The flexibility of space has been tested at application stage to ensure it could be use in an adaptable way depending on the

final partnership agreement including the number of users that could be supported at a single time.

266. The space will be available for use, free of charge for registered education providers, community groups and charities between 7am - 10pm on weekdays and between 10am - 6pm at weekends.
267. The key benefits include:
- activation of a new public realm
 - bringing people together through shared interests
 - provide a cultural programme of activities
 - practical opportunities for learning skills and employment
268. The delivery of these proposals would be locked into a S106 through an operator and management plan including: continued community engagement; space dimensions; facilities; fit out; staffing; opening hours; marketing; promotions; activities; and programme; commitment for free access for agreed community groups and schools; and proposed rates for other users.
269. An affordable retail unit space (29sqm) with one of the proposed retail units being designed for use by micro retailers and a start-up and incubator/SME office space providing 23 desk spaces. These would be let at 50% market rates and the details would be secured within S106.
270. Integrated cultural commissions both permanent and temporary would accommodate art installations in the new public realm showcasing and working in partnership with local artists from diverse communities. This would be secured within the S106 and would set out the commissioning process and timescales for individual art pieces.
271. Opportunities for free storage space has been identified on site within the development at lower ground level for both traders of Petticoat Lane Market and the potential pop ups and kiosks along Cutler Street West. This will be detailed within the S106 and would be subject to demand and include locations, capacity, and hours of access.

Archaeology

272. The site is located outside and to the east of the Roman and medieval City wall and defences. It is an area of high archaeological potential where remains from the Roman, medieval and post medieval periods are likely to survive.
273. An archaeological Desk based Assessment and Archaeological Evaluation Phase 1 Report have been submitted with the application. Previous investigation on and in the close vicinity of the site have revealed the survival of Roman burials from the known Eastern Roman Cemetery. There is also evidence for Roman quarrying in this area. In the medieval period the area was occupied by tenements and workshops. The site was densely occupied with houses, warehouse and separated by narrow alleys in the later periods.
274. The buildings on the site have ground and basement floors at different levels which will have affected archaeological survival. Some areas

appear to be unbasemented and there is higher potential for archaeological survival here. Clothier Street was realigned as part of the 1980's developments on the site and crosses the former alignment of this street and the former Exchange Buildings – the areas which are unbasemented have potential for survival of remains of 18th and 19th century buildings and earlier medieval and Roman remains.

- 275. Proposed landscaping and tree planting in Cutler Street would involve groundworks outside the existing basements and is likely to have an archaeological impact.
- 276. A Phase 1 evaluation has been carried out in areas of the site which are currently accessible, and this will be followed by evaluation in the remaining areas. The evaluation showed that remains survived in the unbasemented area of Clothier Street and to a limited extent below basement levels. The results of this work will inform a programme of archaeological work to record remains which would be affected by the development.
- 277. The proposals are acceptable subject to conditions to cover archaeological evaluation, a programme of archaeological work and foundation design/

Transport and Highways

Public Transport

- 278. The site is highly accessible by public transport, with national rail services from Liverpool Street and Fenchurch Street stations within walking distance. Services on the Northern, Central, District, Circle, Metropolitan, Hammersmith and City lines, Docklands Light Railway and from 2022 the Elizabeth Line are available at Liverpool Street, Aldgate East, Bank, Tower Gateway and Tower Hill stations, all within walking distance of the site. Numerous bus services are available within walking distance of the site. As such the site records the highest possible Public Transport Accessibility Level (PTAL) of 6b. There are no cycle hire docking stations immediately adjacent to the site, the nearest being available approximately 150m away on Houndsditch.

Car Parking

- 279. London Plan Policy T6 (Car parking), Local Plan 2015 Policy DM16.5 and the draft City Plan 2036 Policy VT3 require developments in the City to be car-free except for designated Blue Badge spaces.
- 280. The development would be car free except for 2 blue badge car parking spaces that would be provided at the basement level 4. Occupants and visitors to the site would have access to these parking spaces. 24-hour access to the blue badge parking spaces would be provided.
- 281. The blue badge parking spaces would be equipped with electric charging points. This will be secured by condition.
- 282. The proposed development would be policy compliant in respect of the proposed car parking arrangement and would represent an improvement

on current circumstances as the existing 5 informal private car parking spaces on Clothier Street would be removed.

Cycle Parking

283. The London Plan Policy T5 (Cycling) requires cycle parking be provided at least in accordance with the minimum requirements published in the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.
284. The proposed level of cycle parking is compliant with the London Plan, as is shown in the table below.

London Plan long stay cycle parking	Proposed long stay cycle parking	London Plan short stay cycle parking	Proposed short stay cycle parking
948	948	33	33

285. The cycle parking for the new office building would be accessed via two separate entrances, one from Houndsditch and one from Cutler Street North. Both entrances would occupy prominent locations on the office frontage and provide a front of house arrival experience for people cycling.
286. 948 long stay cycle parking spaces would be provided at basement level 1. Access to the cycle parking would be provided via two lifts and two staircases located close to the entrances at ground floor level. A mix of cycle parking would be provided, including; 746 spaces on two tier racks, 108 spaces provided by Sheffield stands and 94 spaces for folding bicycles.
287. The Transport Assessment includes an assessment of the capacity of the lifts and staircases which demonstrates that the two staircases and two lifts could accommodate arrivals in a scenario with full occupancy of the cycle parking.
288. 21 short stay cycle parking spaces would be provided within basement level 1, accessed from the same lifts and staircases as the long stay cycle parking. This short stay cycle parking would be secure and sheltered from the elements.
289. 12 short stay cycle parking spaces would be provided in the public realm as 3 Sheffield stands close to the entrance on Houndsditch and 3 stands close to the entrance on Cutler Street North.
290. 5% of the cycle parking spaces are accessible for larger adapted cycles and this arrangement would be secured by planning condition in line the London Plan Policy T5 (Cycling), the London Cycling Design Standards 8.2.1, and the draft City Plan 2036.
291. The proposals include 94 showers, and 948 lockers at basement level 1. The London Plan Policy 10.5.7 recommends a minimum of 2 lockers per

3 long-stay spaces, and at least 1 shower per 10 long-stay spaces. The proposals meet the London plan recommendations for the number of showers and lockers.

- 292. The applicant would be responsible for promoting the use of the cycle parking spaces through a Section 106 obligation to produce a Cycling Promotion Plan, which would be a cycling focused Travel Plan. It would be submitted to the City for approval in line with London Plan Policy T4 (Assessing and mitigating transport impacts).
- 293. In the plan, the applicant would be required to detail the arrival experience and how the visitor cycle parking would be highlighted as available for use by members of the public. The City's Strategic Transportation team will develop a common approach to signage and branding to identify cycle parking that is available for public use. It is expected that this signage would be used at this development and across the City on future developments to create a consistent, legible signpost for visitor cycle parking within private developments.

Servicing and deliveries

- 294. Policy DM16.5 of the Local Plan 2015 and the draft City Plan 2036 Policy VT2 require developments to be designed to allow for on-site servicing. London Plan Policy T7 (Deliveries, servicing and construction) requires development proposals to provide adequate space off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.
- 295. Servicing would take place off-street accessed from Houndsditch which would limit disturbance to residents of the Middlesex Street Estate. Vehicles would access the servicing area via two vehicle lifts, one for vehicles entering and one for exiting. The lifts would take vehicles to and from basement level 4 where the servicing area is proposed. The servicing area would accommodate 2 vehicles up to 7.75m in length. The servicing area would provide space for vehicles to manoeuvre and enter and exit the vehicle lifts from Houndsditch in a forward gear.
- 296. The servicing area would be equipped with electric charging points for delivery and servicing vehicles. This will be secured by condition.
- 297. Access for cargo bike deliveries is provided from Houndsditch.
- 298. The draft City Plan 2036 Policy VT2 requires major commercial development to provide for freight consolidation. London Plan Policy T1 (Strategic approach to transport) requires development 'to minimise freight trips on the road network including through consolidation'. Proposal 38 in the City of London Transport Strategy is to 'Reduce the number of freight vehicles in the Square Mile'. The City of London Transport Strategy defines freight consolidation as 'routing deliveries to a business, building or area via a warehouse where they are grouped together prior to final delivery.' The City of London Freight and Servicing SPD, point 63, requires suppliers to use consolidation centres in suitable locations within Greater London to minimise the number of trips required to service developments.

299. The applicant is proposing to use an off-site consolidation centre to reduce the number of deliveries to the development per day. The applicant has agreed to a cap of 34 deliveries per day. A requirement to use off-site consolidation and the cap on daily vehicle numbers will be secured in the Section 106 agreement.
300. The draft City Plan 2036 Policy VT2 requires delivery to and servicing of new developments to take place outside peak hours (0700-1000, 1200-1400, and 1600-1900 on weekdays) and requires justification where deliveries within peak hours are considered necessary. The applicant has agreed to no servicing at peak times 0700-1000, 1200-1400, and 1600-1900, in line with the City of London Transport Strategy for both parts of the development.
301. The submission of a delivery and servicing plan, further detailing how deliveries would be managed to reduce their impact on the surrounding highway network, would be secured in the Section 106 agreement.

Waste Storage

302. Local Plan policy DM17.1 requires development schemes to incorporate waste facilities and allow for the separate storage and collection of recyclable materials.
303. The proposals incorporate a bin store at basement level 4. Waste would be expected to be collected daily, with the collection vehicle accessing the bin store via the proposed servicing vehicle lifts as detailed in the Servicing and Deliveries section above.
304. The City of London's Cleansing Team have confirmed that the proposed waste storage and collection facilities complies with their requirements.

Pedestrian Comfort

305. The Transport Assessment includes an estimation of trip generation for the existing and proposed developments. The proposed development would be expected to result approximately 2,575 trips in the AM peak hour and 2,575 trips in the PM peak hour.
306. The transport assessment has modelled the likely arrival routes for pedestrians based on spatial accessibility analysis which looks at spatial layout, land use and transport factors. 43% of pedestrian arrivals are predicted from Liverpool Street Station via Devonshire Row and Devonshire Square, 21% of pedestrian arrivals are predicted from Moorgate via London Wall and Houndsditch, 16% from Aldgate and Aldgate East via White Kennet Street and 6% of pedestrian arrivals from the site are predicted from Fenchurch Street via Houndsditch.
307. Transport for London's Pedestrian Comfort Guidance recommends a minimum Pedestrian Comfort Level (PCL) of B+ for all areas but defines a C+ comfort level as acceptable in office and retail areas. Proposal 2 of the City of London Transport Strategy aims to achieve a minimum PCL of B+.
308. A pedestrian comfort assessment has been conducted for the site. The assessment is based on pedestrian survey data was collected in

November 2019. A future scenario for 2030 has been assessed which includes proposed development trips and employment population growth.

309. Existing pedestrian comfort levels (PCL) are impacted by the narrow footways on Cutler Street North and West. The analysis shows that the proposed setting back of the building line would provide for minimum comfort levels of A- on Houndsditch, Cutler Street West and Cutler Street North. There are trees proposed in the middle of the footways on Houndsditch, Cutler Street West and Cutler Street North. The pedestrian comfort assessment demonstrates that these could be delivered while maintaining acceptable levels of pedestrian comfort.
310. A comparison of the pedestrian forecasts for the future baseline without development and the future baseline with development highlights that the proposed development would result in a significant increase in pedestrians using Devonshire Row, Devonshire Square and White Kennet Street to connect to the wider highway and public transport networks. The Pedestrian Comfort Level assessment predicts that the development would result in 1,350 additional pedestrians using Devonshire Square (a 58% increase) and 500 additional pedestrians using White Kennet Street (a 25% increase).
311. The pedestrian comfort level on Devonshire Row would fall from a B to a C+ in places without tables and chairs and from a C to a D where chairs are present. Devonshire Row is a pedestrian zone between the hours of 8am and 6pm, with no vehicular access permitted.
312. Devonshire Square and White Kennet Street both have narrow footways which are below 2m wide. As a result, sections of these streets achieve a PCL of F both before and after the proposed development flows are added. To achieve an acceptable level of pedestrian comfort following the increase in pedestrians generated by the development using Devonshire Square and White Kennet Street, pedestrian priority measures will be introduced, and this would be secured through a S278 agreement. Pedestrian priority means the streets would be designed so all vehicles, including cycles, will be expected to give way to people walking. Timed closures and access only restrictions will be explored through the S278 evaluation and design process. These works would be fully funded by the developers
313. Overall, the proposals would be considered to have an acceptable impact on pedestrians using the surrounding streets. The proposed set back of the building line would improve the streets immediately adjacent to the development and improvements to the wider walking environment secured through the S278 agreement would ensure that the increase in pedestrians travelling to and from the site could be accommodated while maintaining an acceptable level of pedestrian comfort.

Section 278 Agreement

314. The applicant will be required to enter into a Section 278 agreement to mitigate the impact of additional pedestrian flows in the surrounding area and to contribute towards the delivery of the London Plan policies T2

and D8. The scope of the S278 agreement will cover Houndsditch, Cutler Street West, Cutler Street North, Devonshire Square and White Kennet Street as follows;

- Footway repaving on Houndsditch, Cutler Street West and North and any works required to integrate the proposed highway to be adopted into the existing highway
- Introduction of raised tables at junctions of Houndsditch and Cutler Street West, Cutler Street West and Cutler Street North, Cutler Street North and Harrow Place/ White Kennet Street
- Changes to carriageway treatment on Cutler Street West
- Pedestrian priority measures on Devonshire Square and on White Kennet Street between Harrow Place and Stoney Lane. The City's Transport Strategy details the approach to be taken for pedestrian priority streets;
- *Pedestrian priority streets will allow access for motor vehicles, with all vehicles, including cycles, expected to give way to people walking. In some instances, streets will be fully pedestrianised or not allow motor vehicle access at certain times. The access requirements for each pedestrian priority, fully pedestrianised or timed pedestrianised street will be fully assessed as part of the project delivery process and would be subject to traffic order making procedures*
- The potential introduction of two-way traffic movement on Cutler Street North (subject to traffic order making procedures.

315. Through the evaluation and design process opportunities to improve the streets in line with the 10 healthy streets indicators, such as additional planting and seating, will be explored.

316. The equality impact section of this report has identified potential adverse impacts of the placement of street trees in the middle of the footway on blind and partially sighted people. The detailed design of the footways through the S278 agreement will ensure adequate tactile information and tonal contrast to warn blind and partially sighted people of the presence of the trees.

Stopping Up

317. A stopping up order would be needed to stop up the entire area of Clothier Street which would be built upon if the development was implemented. In total the applicant is proposed to stop up approximately 345sq.m of public highway.

318. The Court has authorized the Town Clerk to make stopping up orders that are not opposed, and he has delegated this authority to the Executive Director of Environment. Opposed stopping up orders are, however, reported to your Committee to determine.

319. Local Plan Policy DM16.2 – 2 states:

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

- *the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;*
 - *the shortest practicable routes between relevant points.”*
320. The proposal would result in additional footway being provided along the building frontage along Cutler Street North. Officers consider this additional footway provides greater value in terms of accommodating foreseeable future demands on the highway network. The route between Liverpool Street and Aldgate, via Devonshire Row, Devonshire Square, Cutler Street North and White Kennet Street, is popular with pedestrians and providing this additional space will help to accommodate future growth. Clothier Street would not be expected to see a significant increase in use in a future scenario without the proposed development.
321. Local Plan policy DM 16.2 – 3 states;
- “Routes of historic importance should be safeguarded as part of the City’s characteristic pattern of lanes, alleys and courts, including the route’s historic alignment and width.”*
322. The heritage value of Clothier Street is assessed in the section entitled ‘Demolition of the existing buildings and removal of Clothier Street’. The section concludes that the existing Clothier Street is a relatively modern construct and that the loss of Clothier Street would be acceptable in heritage terms.
323. Officers consider the proposed stopping up and replacement with a widening of the existing route along Cutler Streets North and West to be compliant with policy DM16.2.
324. A plan showing the area of highway proposed to be stopped up is included in appendix C. Any stopping up order would be subject to the order making procedures.

Adoption of Public Highway

325. The building line would be set back at ground floor level and an area of approximately 372sq.m would be adopted as highway maintainable at the public expense. A plan showing the area proposed to be adopted is included in appendix C.

Construction Logistics

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

Access and Inclusivity

327. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and

DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2036 and policy D5 of the London Plan.

- 328. The Proposed Development provides two accessible parking spaces at basement level 4, which are accessed via the dual use vehicle lifts on Houndsditch.
- 329. Separate accessible long stay cycle parking area would be provided at basement level 1, which would include dedicated accessible showers.
- 330. Glazed entrance doors would be situated immediately adjacent to the revolving doors, which would be automated and of equal importance as entrances to the building. All pass doors would be clearly sign-posted.

Security

- 331. Local Plan Policy DM3.2, draft City Plan 2036 Strategic Policy S2 (Safe and Secure City) and Policy SA3 (Designing in Security) sets out how appropriate security and safety provision must be incorporated into all development. Policy D11 of the London Plan states development proposals should include measures to design out crime that, in proportion to the risk, deter terrorism, assist in the detection of terrorist activity and help mitigate its effects.
- 332. Security measures around the development boundary to provide resilience against vehicle borne attacks have been developed in consultation with the Counter Terrorism Security Officers within the City of London Police. These measures would maintain a secure perimeter and increase stand-off, and include Hostile Vehicle Mitigation which has been designed into the public realm seating and planting strategy. The planters have been designed to provide most of the defences, however where maximum transparency to the facade is required at entrances and the service bay a number of bespoke bollards are proposed which would form part of the overall landscape design approach within the site boundary.
- 333. Further details of security mitigation measures would be secured by condition and through the Section 278 Agreement.
- 334. The proposal, subject to conditions and S106 is considered to be in accordance with policy DM3.2 and draft City Plan strategic policy S2 and policies SA1 and SA3.

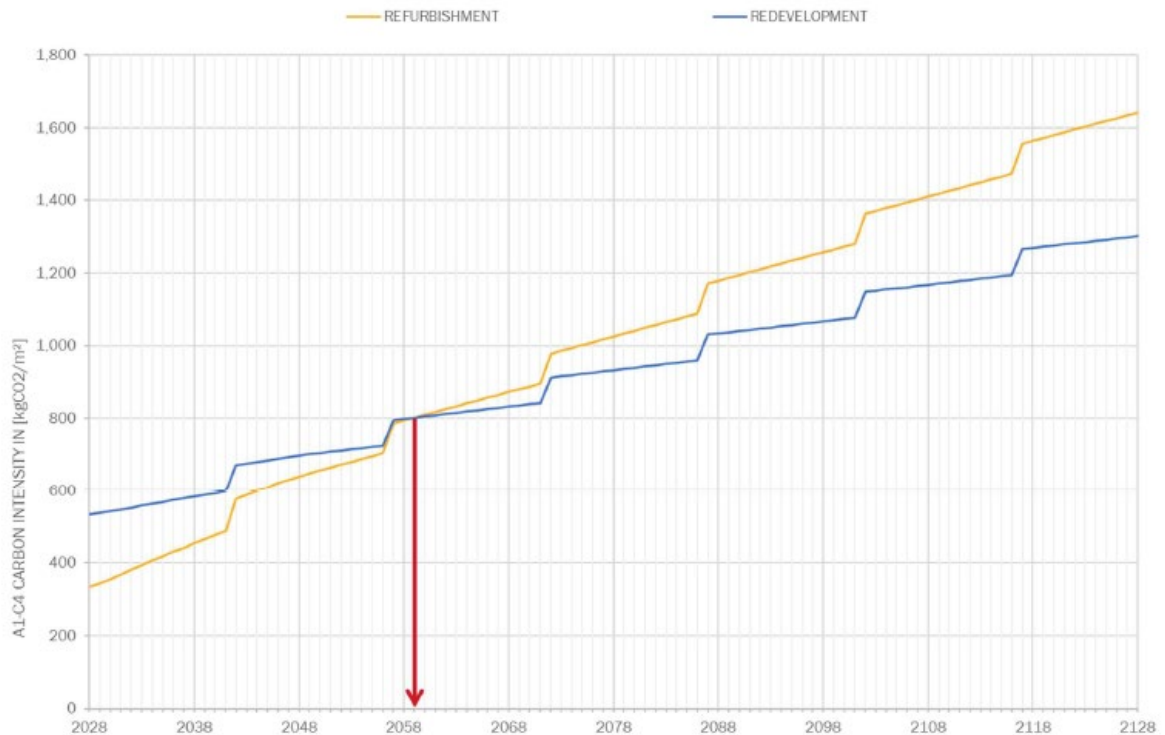
Energy and Sustainability

Circular Economy

- 335. New London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. Emerging City Plan 2036 Policy S16 sets out the City's support for Circular Economy principles.
- 336. The submitted Draft Circular Economy Statement describes the strategic approach to incorporating circularity principles and actions according to the GLA Circular Economy Guidance. The existing buildings on site were

not found to be technically suitable for refurbishment to accommodate the intended use of the building with the aspired quality and performance. The existing buildings do not have the necessary structural capacity as well as build-in adaptability and functionality normally expected of a modern building and therefore would lack potential to attract tenants and contribute to the prosperity of the area.

337. This evaluation has been underpinned by a study to assess a refurbishment option with a 2-storey extension that can be supported by the existing structure and that incorporates a ratio of retention and alterations to existing building elements and to new services with the best possible, balanced outcome with respect to embodied and operational carbon emission savings. This option was compared to the submitted redevelopment option (per square meter), and the study concludes, that over the lifetime of the building of 100 years considerable Whole Life Cycle carbon emission savings can be achieved, with a carbon savings advantage per square meter of floorspace of the redevelopment over the refurbishment likely after 30 years. A further option, assuming a much larger extension, would incur higher upfront embodied carbon emissions closer to the level of the redevelopment option due to required structural strengthening works and, compared to the redevelopment option, would not provide a high level of circularity benefits in terms of adaptability, flexibility and disassembly.
338. The applicants have presented the comparison of the Whole Life-cycle carbon emissions of the refurbishment option (with a 2-storey extension) and the proposed redevelopment option per square meter in the following graph (refurbishment in yellow; redevelopment in blue):



339. The applicants are committed to consider opportunities to recover the 'residual value' of the building's materials for reuse and recycling wherever possible. The strategy has been informed by a pre-demolition audit.

340. The development adopts a circularity strategy that includes:

- Retaining part of the perimeter basement walls, and reuse of suitable demolition materials and recycled aggregates in concrete
- Incorporating low carbon materials
- Procuring steel with maximum recycled content
- Using cement replacement products
- Using responsibly sourced and certified materials
- Complying with the GLA targets on the recycling, reuse and diversion from landfill of all waste associated with the building works
- Prioritising pre-fabricated products, unitised façade construction and bolted structural connections to enable material efficiency and layer independence to aid future disassembly
- Providing a Resource Management Plan, informed by a pre-demolition audit already completed
- Enhancing the building's flexibility to adapt to future needs, e.g. flexible floorspace layouts, utilising the structure as finish, enable the addition of on-floor plant, provision of access to risers and sufficient space provision in cores, waste stores and cycle stores to enable an increase of occupancy levels
- Considering take-back schemes wherever possible.

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

Energy and CO2 emissions

342. The Energy Statement accompanying the planning application demonstrates that the development (option A) has been designed to achieve an overall 44% reduction in regulated carbon emissions compared with a Building Regulations compliant building.
343. The proposed energy demand reduction strategy would reduce the building's operational carbon emissions by 17% compared to a Building Regulations compliant building and includes the following main elements:
- Enhanced thermal envelope performance and air tightness
 - Solar shading will be applied to areas at high level, including the 'sky pavilion'
 - Solar controlled glazing on all façades
 - Thermal mass in the form of exposed concrete slabs
 - Optimised glazing areas to allow daylight penetration
 - Green roofing and external planting on terraces to mitigate urban heat island effect
 - Operable windows for passive ventilation as part of a mixed mode system with mechanical cooling provided by the heat pump system.
 - Incorporation of heat recovery from the building services systems, to support space heating
344. There is currently no available district heating network close enough to the site, however, the opportunity to connect to a future district heating network would be incorporated into the proposed development.
345. The proposed low carbon/renewable energy technologies are an air source (and potentially ground source using a thermally activated raft slab – to be investigated) heat pump system based on water cooled chillers and thermal stores for low temperature hot water and chilled water, supported by a water source heat pump for high temperature water, as well as an 30sqm PV panel installation. These technologies would contribute carbon emissions savings of 27% compared to a Building Regulations compliant building. In addition, opportunities to share waste heat with the neighbouring residential developments will be investigated that would provide wider community benefits.
346. The applicants commit to following the transformation to net zero carbon for operational carbon emissions set by LETI (London Energy Transformation Initiative), targeting an ambitious low energy use intensity of 55 kWh/m²/year (GIA) for the completed development. This target does not include renewables and LETI recommends to prioritise

on-site renewables before off-site renewables followed by a minimum 15 year renewable energy power purchase agreement. Achieving the LETI target will be possible for the proposed development if the tenants take responsibility for their part of the building energy demand via green leases and if the detailed design development focusses on optimising the building services strategy.

347. The applicant's consultants have provided table 1.2 that compares the predicted annual operational carbon emissions per square meter of the existing and the proposed building as the grid decarbonises:

1.2 Operational Carbon Comparison

	Existing	Proposed	unit
Basis of Energy (gas, electric,...)	Gas + electric	Electric	
EPC	EPC D (115 Houndsditch) EPC E (117 Houndsditch) DEC E expired (123 Houndsditch)	EPC A (Stage 2 calculations)	
Net Internal Area (NIA)	11,240 combined	42,843	m2
Increase in NIA		381%	
SAP 2012 Grid Carbon Factors			
Operational Carbon emissions per m2	79 (area weighted average of existing buildings BER from EPC)	14.2 (Stage 2 BRUKL)	kgCO2e/m2/yr
% reduction in carbon intensity		-82%	
Total Operational Carbon emissions	887,970	608,370	kgCO2e/yr
% increase/reduction in Total Annual Carbon Emissions		-31.5%	
SAP 10 'current Grid Carbon Factors			
Operational Carbon emissions per m2	41.7*	6.4	kgCO2e/m2/yr
% reduction in carbon intensity		-85%	
Total Operational Carbon emissions	468,708	274,195	kgCO2e/yr
% increase/reduction in Total Annual Carbon Emissions		-41.5%	
Assuming predicted 2035 Grid carbon Factors (Steady Progression Model = electricity 0.095kgCO2/kWh)			
Operational Carbon emissions per m2	23.9*	2.6	kgCO2e/m2/yr
% reduction in carbon intensity		-89%	
Total Operational Carbon emissions	268,636	111,392	kgCO2e/yr
% increase/reduction in Total Annual Carbon Emissions		-58.5%	
Assuming predicted 2035 Grid carbon Factors **			
Operational Carbon emissions per m2	11.6*	0	kgCO2e/m2/yr
% reduction in carbon intensity		-100%	
Total Operational Carbon emissions	130,384	0	kgCO2e/yr
% increase/reduction in Total Annual Carbon Emissions		-100%	

* Based on notional split of energy consumption 30% natural gas and 70% electricity (no details available for existing building consumption beyond EPC)

** Assumes UK grid electricity reach zero carbon from early 2030s.

348. The site-wide energy strategy demonstrates compliance with the London Plan carbon emission reduction targets. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

BREEAM

349. A BREEAM New Construction 2018 pre-assessment has been prepared for the building. The strategy aims to achieve an "Outstanding" rating for the offices on the basis of a "full fit-out". The assumptions made as part of the preliminary pre-assessment indicate that the proposals can meet all the mandatory level requirements for the targeted rating including a score of >85%. The pre-assessment indicates a score of 89.1% and aims to achieve a high number of credits in the CoL's priority categories of Energy, Water, Pollution and Materials. Further credits could be

targeted in the detailed design phase and fit-out phase of the development.

350. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2036 Policy DE1. A post construction BREEAM assessment is requested by condition.

Other benchmarking

351. The scheme has also been assessed against the WELL Building Standard version 2 and against the LEED standard (BD+C v4.1). The WELL standard assesses a building's contribution to improved human health and wellbeing, and the proposal would achieve a "Platinum" rating which is the highest score. The LEED standard (shell and core) is a green building project and performance management assessment that focusses on green building design, construction, operations and performance. The proposed development would also achieve a "Platinum" rating here which is the highest score.

Whole Life-Cycle carbon emissions

352. Emerging New London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.
353. Since the existing building on site has been found unsuitable to be transformed into a high quality, sustainable development over a 60+ year lifetime (see Circular Economy paragraph), the proposed Whole Life-Cycle carbon reduction strategy is based on reducing embodied carbon impacts of the new building elements, in particular focussing on using:
- a steel frame using HISTAR steel with high recycled content
 - UK sourced steel reinforcement with 97% recycled content
 - concrete elements with 50% GGBS replacement
 - Low-carbon calcium sulphate raised access flooring system.

354. The use of virgin materials would be minimised through the reuse of materials from the existing building wherever possible and the widespread use of reused and recycled materials elsewhere throughout the scheme. The building would also be designed for an eventual deconstruction.

1.1 Embodied Carbon benchmark comparison

Scope	Proposed Redevelopment	Benchmark	Benchmark Source
RICS Components	kgCO ₂ /m ²	kgCO ₂ /m ²	
A1-A5	526	1000	GLA Benchmark
		600	GLA Aspirational
		600	LETI 2020 Design
		350	LETI 2030 Design
A-C (excluding B6-B7)	768	1500	GLA Benchmark
		1400	RIBA Business as Usual
		1180	RIBA 2021 Good
		970	RIBA 2025
		900	GLA Aspirational
		750	RIBA 2030
A-C (including B6-B7)	1861		

355. Table 1.1, provided by the applicant's consultants, shows the embodied carbon benchmark compared to various benchmark sources over the proposed development's whole life-cycle at planning stage, demonstrating emissions that improve on the Greater London Authority's aspirational benchmark emissions target. A detailed Whole Life-Cycle carbon assessment incorporating improvements that can be achieved through the detailed design stage, and a confirmation of the post-construction results have been requested by conditions.

Urban Greening and Biodiversity

356. Local Plan Policy DM19.2 promotes Urban Greening and Biodiversity, DM 10.2 (Design of green roofs and walls) and 10.3 (Roof gardens and terraces) encourages high quality roof gardens and terraces.
357. The site currently has a low biodiversity value. The new development proposes a variety of opportunities to enhance urban greening and biodiversity at ground level, on terraces and roof level 23. The roof level would provide a sequence of landscaped terraces backed by panel based green walls and climbing planting.
358. The new building would be set back at ground floor level to enable the creation of new public realm areas which would include planters, green walls, integrated seating and ten new trees. Planting would be included at public realm level through large planters and trees and at every level of the building (up to Level 24) on balconies and terraces. On the upper levels (Levels 16 to 23) there are proposed office amenity terraces which would include smaller trees and trailing plants and at the top of the building climbers and green walls (Level 24) would feature. A large office

amenity terrace would be located on Level 23 which would include 'garden rooms' for groups to congregate. The roof terraces are important amenity spaces for the building occupiers and would provide views of the City skyline and beyond.

359. The ecological appraisal recommends the provision of diverse, native wildlife planting. This would include
- Rows of street trees
 - A "woodland understorey" of layered planting in containers at public realm level. The planting is chosen to be able to thrive in shade, and would consist of a mix of evergreen and deciduous plants
 - 2 x 22m high green walls of climbers on the two exposed party walls in Cutler Street and Houndsditch
 - A variety of balconies on each office floor with overflowing planting
 - A cascade of office amenity terraces with small trees and trailing plants
360. The terrace planting has been selected to be a mix of shrubs and perennials in combination with climbing plants that are allowed to trail over the balcony fronts and that would suit the different climatic aspects relating to the different elevations of the building. The plant palette would provide seasonal interest and variety but also structure throughout the year, approx. 50% of the plants will be deciduous and 50% evergreen.
361. The biodiverse features would provide a green and attractive setting as there are hard roof surfaces on the existing and surrounding buildings and would result in a net gain in biodiversity value to the site. Any proposed works should take place outside the bird nesting season (March to August) to avoid disruption to wildlife.
362. Details of the quality and maintenance of the proposed urban greening are required by condition.
363. The proposals to incorporate a green wall, street trees and shrubs will result in a potential biodiversity net gain of 0.61 biodiversity units.
364. An Urban Greening Factor (UGF) calculation score has been submitted with the application based on the London Plan scoring table. The red line planning application boundary is based on a site area of 2,884sq.m. The UGF for this application has been calculated as 0.53 based on the information provided, which exceeds both the London Plan and the City's draft Local Plan UGF target of 0.3 for commercial development.
365. The proposal would comply with Local Plan urban greening and biodiversity policies DM10.2, DM10.3 and DM19.2.

Climate Change Resilience

Water resources

366. A low-water irrigation system, water metering and rainwater recycling and harvesting systems are intended to be incorporated to reduce water demand.

367. Further reductions in potable water will be targeted through the specification of highly efficient water saving fixtures, fittings and appliances in order to achieve a 50% improvement over baseline building water consumption.

Flooding

368. The development employs a comprehensive rainwater management strategy, which includes blue/green roofs, rainwater harvesting, and extensive attenuation tanks beneath the building to store peak flows. The basement will be protected by the highest possible grade of waterproofing.

Heat Stress

369. The sustainability statement outlines measures to prevent overheating through the design of the building envelope and the high thermal mass of the building that absorbs heat and provides free cooling via natural ventilation and a supporting air conditioning system. Rejected heat from the air con system would be stored and reused rather than discharged into the atmosphere. The building services system and layout would be adaptable to a changing climate.

Natural Capital and Pest & Diseases

370. The proposed development will incorporate urban greening that would provide a significant increase of quantity and quality of diverse planting in the area, both as public realm enhancement and biodiversity gain overall. This will help to enhance biodiversity providing green routes and small habitats. The details of the landscape planting will be important in ensuring that the plants and habitats created are resilient to hotter dryer summers, warmer wetter winter, more extreme weather events and pests and diseases. In addition, the building services system would provide high fresh air rates and filtration measures to eliminate risks of pests and diseases.
371. Overall, this development would include a wide range of measures that demonstrate a clear approach to improve its resilience to climate change. Details of these measures will determine how effectively the building performs in coming decades, and conditions are attached to seek more detailed modelling and planting plans against the UK Climate Projections UKCP18 to 2080.

Conclusion

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

373. The proposed development, by way of its central location within London, its opportunities for providing a positive and healthy work/life environment, and its environmental credentials, would positively contribute to the economic, social and environmental sustainability of the City of London. The proposed sustainability strategy is considered to be an exemplar for demonstrating a holistic approach to creating an inherently sustainable new building as it overall exceeds current and new London Plan policies as well as Local Plan policies, and it is on track to achieve an “outstanding” BREEAM assessment rating as well as highest ratings in the WELL and LEED standards.
374. In particular, the proposals indicate that Whole Life-Cycle Carbon emissions can be significantly reduced, exceeding industry benchmarks including the GLA’s aspirational benchmark. The existing building has been assessed and found to be unsuitable to be transformed into an attractive and sustainable development for a 60year+ period, however, significant operational carbon savings can be achieved over the lifetime of the proposed building. Circular Economy principles have been positively applied to achieve an exemplary, long term, robust, low carbon, flexible and adaptable development. The building design responds well to climate change resilience by reducing solar gain, incorporating natural ventilation, water saving measures and various opportunities for urban greening and biodiversity while passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond London Plan requirements.

Heat Transfer to the Estate

375. It is proposed to provide thermal stores within the building which would retain waste heat for use later in the year during the cold months. The building is calculated to produce excess waste heat over and above that which can be retained by the thermal stores.
376. Instead of projecting this out to atmosphere it is proposed that this would be exported to the neighbouring Middlesex Street Estate to supply hot water and heating. A 3m³ tank can currently be accommodated on the Middlesex Street Estate site, which is capable of providing circa 365MWh of heat energy per year.
377. The applicants have stated that this is a conservative estimate and the actual potential for the system is significantly higher. The Applicant is proposed to future proof the provision to enable an increase in supply in the future subject to the storage space available within the Estate.
378. An objection has been received stating that “There is no absolute commitment to build an effective heat transfer infrastructure, and then the amount of usable heat that will be transferred is questionable since the new building is powered only by electricity, any usable 'waste' heat that may be recaptured would be more effectively used for water heating, etc within the building itself”.
379. The shared waste heat from the proposed development could provide significant benefit to residents of Middlesex Street Estate by reducing the

load on the gas boiler plants leading to energy, carbon and financial savings. The on site equipment would be secured by condition. The link to the Estate and the equipment within the Estate would be funded by the applicant, which would be secured through the S106 agreement.

Environmental Impact of Proposals on Surrounding Area

380. Local Plan policy DM10.1 requires the design of development and materials used should ensure that unacceptable wind impacts at street level and in the public realm be avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy DM10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2036 Strategic Policy S8 and Policy DE2 requires developments to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

Daylight, and Overshadowing

Assessment Context

381. An assessment of the impact of the proposed development on the daylight and sunlight received by surrounding residential buildings and public amenity spaces, has been submitted in support of the application. The effects of the development have been assessed having regard to the recommendations in BRE Report 209, Site Layout Planning for Daylight and Sunlight: A guide to good practice (second edition, 2011).
382. Objections to the proposals have been received from residents of the Middlesex Street Estate on the grounds of the development's impact upon the daylight and sunlight to residential properties and its overshadowing of nearby open spaces including within Devonshire Square, the Podium within the Estate, and to shopfronts along Harrow Place. No objections have been received from the owners and tenants of Devonshire Square.
383. Policy DM10.7 of the Local Plan seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the BRE guidelines. Policy DE8 of the emerging City Plan 2036 requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards, taking account of the BRE guidelines.
384. The BRE guidance advises that numerical values are not to be rigidly applied but recognise the specific circumstances of each case. This is acknowledged in the supporting text to policy DM10.7 which states that "The Building Research Establishment (BRE) has issued guidelines that set out several methods of assessing changes in daylight and sunlight arising from new developments. The City Corporation will apply these methods, consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations".

385. The assessment submitted in support of the application has assessed the impact of the proposed development on the daylight and sunlight received by the residential properties at 2 Heneage Lane, Petticoat Tower, Petticoat Square Apartments (also known as Middlesex Street Estate) and 3 and 3A Devonshire Square. Overshadowing assessments have been undertaken in respect of Devonshire Square public realm, Middlesex Street Estate podium level and 2 Heneage Lane/Bevis Marks Synagogue.
386. Paragraph 3.10.41 of the Local Plan and Policy HS3 of Draft City Plan 2036 states when considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals. The cumulative schemes considered under this application include those large-scale major development proposals within 1km of the site which either have full planning permission, resolution to grant consent, applications which are submitted but not yet determined, or potential future applications.
387. None of the cumulative schemes as assessed within the submitted Environmental Statement are professionally considered by the Applicant's Team to be of sufficient massing or in close enough proximity to materially alter the effect of the Proposed Development in terms of the impact upon daylight and sunlight.
388. It is not the case that if the proposed development were granted planning permission a precedent would be set. Any other developments coming forward within the area would still need their own detailed analysis and justification, including cumulative analysis.

Daylight

389. Regarding daylighting, the vertical sky component (VSC) and daylight distribution tests have been applied. The VSC test measures the amount of skylight available at the centre of a window on the external plane of the window wall. The BRE guidelines state that a window which achieves a VSC of 27% or more is considered to provide good levels of light. If with the proposed development in place the figure is both less than 27% and reduced by 20% (0.8 times its former value) or more than the existing level, the loss would be noticeable.
390. As the VSC calculation does not account for the size of the window being tested, the size of the room that it lights or whether there are multiple windows serving a room, the BRE guidelines recommend that the results should be read in conjunction with those of a second test - daylight distribution. The daylight distribution test, also referred to as the No Sky Line test (NSL), calculates the areas of a working plane inside a room (usually 0.85m above the finished floor level) that would or would not have a direct view of the sky. The BRE guidelines state that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% (0.8 times its former value) or more, the loss would be noticeable.
391. A total of 850 windows serving 389 rooms have been assessed in relation to daylight using the VSC and NSL tests.

392. In addition, the Applicants have undertaken and submitted supplementary Radiance Assessments of the daylighting to the affected residential apartments within Petticoat Tower, Middlesex Street Estate and at 3 and 3A Devonshire Square. The radiance diagrams are contained within the plans pack.
393. A Radiance Assessment is a lighting simulation tool that measures the individual 'daylight factors' at a number of given points (usually based on a grid) within a room (or defined space). This method of assessment takes into account the total glazed area to a room, the transmittance quality of the glazing, the total area of the room's internal surfaces, including ceilings and floors, and their reflectance values (which may be actual or reasonably assumed). The radiance method of assessment also takes into account the quantum of light reflected off external surfaces, including the ground and nearby buildings.
394. Whilst there is currently no established guidance regarding what constitutes a 'noticeable' or 'significant' change in daylight when using the BRE guidelines Radiance methodology, the radiance-based assessments can draw upon the BRE's recommended Average Daylight Factor (ADF) target values. Radiance assessment results are presented as colour rendered images to illustrate the individual daylight factors within room. It should be noted that the radiance assessment is not to be relied on solely and should be read in conjunction with the daylight and sunlight assessment submitted in the Environmental Statement in line with BRE Guidelines, which is the methodology established within the development plan/policy framework.
395. The Average Daylight Factor (ADF) assessment is a measure of the overall amount of diffuse daylight within a room that is measured at a working plane 0.85m above a room's finished floor level. The ADF can be calculated a number of ways but the most commonly used methodology is the formula set out in the BRE guidelines. This formula takes account of: the size and shape of a room and its serving window(s); the actual or reasonably assumed reflectance values of a room's internal surfaces (walls, floors and ceiling); the diffuse transmittance of the glazing to the serving window(s); and the amount of visible sky, which is calculated through a Vertical Sky Component assessment.
396. The BRE Guidelines recommend an ADF of 5% or more if no supplementary electric lighting is to be used within a room, or 2% or more if supplementary electric lighting is provided. The guidelines recommend the following minimum ADF values for residential properties: 1% for bedrooms, 1.5% for living rooms and 2% for kitchens
397. It should be noted that where there are existing low levels of daylight in the baseline figures any change in the measured levels has been generally described in two ways to give a more complete picture. These are:
- Percentage change (10% reduced to 8% = 20% reduction); and
 - Actual/Absolute change (10% reduced to 8% = 2% change)

3 and 3A Devonshire Square

398. Located to the north of the development site, this property contains three residential dwellings. Two windows are located at the rear of 3 Devonshire Square facing north-east. A total of 21 windows serving 8 rooms have been assessed using the Vertical Sky Component (VSC) methodology.
399. The results show that, of the 21 windows assessed, 16 windows would experience a reduction of 20-29%, and three windows would experience a reduction of approximately 40%. The two rear windows would not experience a reduction in VSC as a result of the proposed development. It is worth noting that the three windows with the highest reduction are located on the flank elevation, and are secondary windows serving the dual aspect living/dining rooms. The main windows of these rooms are located on the front elevation and receive a reduction in VSC of less than 30%. Each window on this elevation retains above 15% VSC at first floor, above 18% at second floor and above 20% VSC at third floor. Mayor of London Supplementary Planning Guidance recognises that VSC values between 13% and 18% have been accepted in many desirable central areas for well over a century.
400. The daylight distribution results using No Sky Line (NSL) calculations show that all rooms would experience small reductions in daylight distribution, with the largest reduction being 7%. This would be a negligible reduction in daylight distribution within the rooms.
401. The Radiance assessment demonstrates that there would be a small reduction in the daylight factor within the rooms. The Living/Dining rooms at first and second floors retain 1.8% and 1.6% ADF; and the Bedrooms 2% and 1.9% ADF. These would be considered appropriate for their intended uses.
402. The first-floor kitchen is reduced from 1.7% to 1.4% ADF and the second floor from 1.6% to 1.3%. While the kitchens would fall below the 2% target, they are small and appear to fall below the size 13sq.m threshold to be qualified as a habitable room for the purposes of the calculations, and are therefore considered to possess a lesser expectation of natural daylight compared to a primary living room.
403. The uses of the third floor rooms are unknown, but have been assessed as separate rooms/flats from the floors below. These rooms would experience an ADF of 0.9% and 0.7%, reductions of 0.3% and 0.2% ADF respectively. The existing rooms already receive lower light levels by virtue of them having smaller, dormer windows compared to the larger windows on first and second floors.
404. Based on consideration of VSC and NSL together, while there are some minor losses of skylight (VSC) to the main windows the daylight distribution (NSL) of the rooms is unnoticeably affected by the proposed development. The Radiance assessment demonstrates that there would be a small reduction in the daylight factor within the rooms, with the living / dining and bedrooms at first and second floors retaining an Average Daylight Factor appropriate to their uses.

405. The results of all the tests show that the reductions in daylight to the residential units at 3 and 3A Devonshire Square would be small and the retained values would be good for a central London location. The overall impact to these units is considered to be minor adverse taking into account the combined results of the various assessments on daylight.

2 Heneage Lane

406. This property is a residential dwelling located to the south of the site. A total of 7 windows serving 5 site facing rooms have been assessed for daylight.
407. The VSC assessment demonstrates that none of the windows would experience any reduction as a result of the proposed development.
408. The daylight distribution (No Sky Line) test shows that none of the assessed rooms would receive any reduction in daylight distribution as a result of the proposed development.

Petticoat Tower

409. Petticoat Tower is a 23 storey residential tower forming part of the Middlesex Street Estate located to the east of the site. It consists of 88 residential flats located over 22 floors. A total of 128 windows serving 86 rooms have been assessed for daylight.
410. The results show that, of the 128 windows assessed for VSC, 18 windows would experience no reduction in VSC as a result of the proposed development. The remaining 110 windows would experience reductions in VSC of less than 20% over the existing situation, with 56 of them retaining VSC of over 27%. This is considered to be a negligible reduction in light to the windows.
411. The NSL calculations show that 62 of the 86 rooms assessed would experience no reductions in daylight distribution. 21 Rooms would experience reductions of less than 20% daylight distribution meeting BRE guidelines. One room would receive a reduction marginally over 20% and two rooms would receive reductions in daylight distribution of 38% and 40%. It should be noted that these three rooms are bedrooms, which the BRE acknowledge have a lower expectation of light than primary habitable spaces (such as living rooms).
412. The Radiance assessment demonstrates that there would be a very small reduction in the daylight factor within most of the assessed rooms. 10 Rooms would experience no change in their average daylight factor following the development. 74 rooms would experience a reduction of 0.1% in ADF, which is a marginal loss as demonstrated by the Radiance drawings. Two rooms would experience a reduction of 0.2% ADF. These rooms are used as living / dining rooms and would have a resulting ADF of 1.9% and 2%, surpassing BRE's recommended 1.5% ADF for rooms of this use.
413. The overall impact to the majority of residential units within Petticoat Tower is considered to be negligible, with a minor adverse impact to the remaining impacted flats, taking into account the combined results of the various assessments on daylight.

Petticoat Square Apartments

414. The main bulk of Middlesex Street Estate comprises blocks of apartments surrounding Petticoat Square and Petticoat Tower, bounded by Harrow Place, White Kennet Street, Gravel Lane and Middlesex Street. It is located to the east of the site and comprises seven storey blocks with retail at ground floor and a total of 146 residential apartments above. A total of 695 windows serving 290 rooms have been assessed for daylight.
415. The assessment demonstrates that 676 of the windows assessed would experience a reduction in VSC of less than 20%, thereby experiencing a negligible reduction in skylight to the window. Nine windows would experience a reduction of between 20-29% VSC and five windows a reduction of between 30-39%. One window would experience a 57% reduction in VSC, and four windows would experience a reduction of 100%.
416. Where there is a reduction of greater than 20% in VSC to the existing windows, they already receive very low levels of light. The absolute VSC reductions are recorded as being between 0.2% - 1.5%, with the 4 windows experiencing a 100% reduction having an actual loss of 0.1 - 0.3%. These would be fractional and imperceptible reductions which translate into a higher percentage change due to very low existing values.
417. The NSL calculations show that 282 of the 86 rooms assessed would experience reductions in daylight distribution of less than 20% resulting in a negligible impact according to the BRE guidelines. Six rooms would experience reductions of between 20-29% and two rooms would receive reductions of 34% and 37%, which is considered to be a minor adverse effect.
418. The Radiance assessment demonstrates that there would be a very small reduction in the daylight factor within some of the assessed rooms. 225 Rooms would experience no change in their average daylight factor following the development. 65 rooms would experience a reduction of 0.1% in ADF, which is a marginal loss, as demonstrated by the Radiance drawings.
419. The daylight distribution and radiance assessments demonstrate that, while there would be a reduction in the amount of light received by a number of windows, those with the highest reductions would experience less than 20% reduction in NSL and no reduction in ADF, resulting in a limited reduction in light experienced within the room.
420. The overall impact to the majority of residential units within Petticoat Square apartments is considered to be negligible, with a minor adverse impact to the remaining impacted flats, taking into account the combined results of the various assessments on daylight.

Daylight Conclusion

421. Overall the assessments submitted in support of the application demonstrate that there would be some loss of amenity in a small number

of rooms within 3 and 3A Devonshire Square, Petticoat Tower and the Petticoat Square Apartments as a result of the proposed development, with the majority of assessed rooms within the Middlesex Street Estate experiencing a negligible impact as a result of the proposed development. No adverse effects are predicted for the residential unit at 2 Heneage Lane.

422. Taking into account the BRE Guidance, it is considered that the proposed development would not reduce noticeably the daylight available to nearby dwellings to unacceptable levels, and would accord with Local Plan policy DM10.7.

Sunlight

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

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

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

425. The properties at 2 Heneage Lane are located to the south of the proposed development and therefore a sunlight analysis is not required, in accordance with the BRE guidelines.

3 and 3A Devonshire Square

426. All of the eight rooms assessed for daylight have at least one site facing window which is orientated within 90 degrees of due south. The assessment demonstrates that two of the rooms assessed would meet the BRE guidelines criteria, and therefore are considered to experience a negligible impact.

427. Six rooms would receive a reduction of greater than 40% reduction for Winter APSH, with one of those experiencing a reduction of between 20-29% total APSH, two a reduction of between 30-39% APSH and three a reduction of over 40% APSH.

428. Despite these reductions, all main living rooms assessed would retain well in excess of 25% total APSH, which meets BRE Guidance

recommendations for a suburban environment. The overall impact is considered to be minor adverse.

Petticoat Tower

429. Of the 86 rooms assessed for daylight, 64 rooms have at least one site facing window which is oriented within 90 degrees of due south. The assessment demonstrates that 61 of the rooms would meet the BRE guidelines criteria, and therefore are considered to experience a negligible impact. Three rooms would experience a reduction in total APSH of between 20-29% APSH.

Petticoat Square Apartments

430. Of the 290 rooms assessed for daylight, 175 rooms have at least one site facing window which is oriented within 90 degrees of due south. The assessment demonstrates that all of these rooms would meet the BRE guidelines criteria, and therefore are considered to experience a negligible impact

Sunlight Conclusion

431. Overall there would be a negligible impact in the sunlight to residential windows within the Petticoat Square Apartments and to the majority of windows within Petticoat Tower. Three rooms within Petticoat Tower and six rooms within 3 and 3A Devonshire Square would experience a noticeable reduction in sunlight as a result of the proposed development.
432. This is considered to be a minor adverse impact. The majority of the affected rooms within 3 and 3A would still retain well in excess of 25% total APSH following the proposed development, which accords with the BRE guidelines.
433. Taking into account the BRE Guidance, it is considered that the proposed development would not reduce noticeably the sunlight available to nearby dwellings to unacceptable levels, and would accord with Local Plan policy DM10.7.

Overshadowing

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

Devonshire Square

435. The development is situated to the south of Devonshire Square, which contains commercial and residential properties. There is a landscaped area and pedestrian route on the southwestern side of Devonshire Square, adjacent to Cutler Street, which includes seating.

436. In the existing scenario, this landscaped area only receives sunlight between 8am and 10:30am on 21st March and only 22% of the area receives two hours of sunlight, which means that this area already does not comply with BRE guidance. This is due to overshadowing caused by the existing buildings on the site, and other buildings in the locality.
437. The southwestern boundary of the space (adjacent to the road) is planted with a continuous belt of trees, which form a hedge. The impact of these trees have not been included in the applicant's assessment but it is likely that they would cast shadow over the space, particularly because the time the sun would reach it is when the sun is travelling at a lower trajectory.
438. Whilst the proportional loss in sunlight to this space would be very high (82%) and it technically considered to be a major adverse impact, the real impact is likely to be modest in nature and reduce the amount of sunlight to this space by approximately one hour. It is considered that the proposed development would not materially affect the use of this space.
439. On 21st June, 82% of the area would receive more than two hours of direct sunlight a day in both the existing baseline and with the proposed development.

Middlesex Street Estate

440. The development is situated to the southwest of the Middlesex Street Estate. The podium in the centre of the Estate is amenity space for residents of the Estate.
441. The submitted assessment explains that 74% of this area receives two hours of direct sunlight on 21st March. Following the proposed development there would be no reduction to the areas receiving more than two hours of sunlight and the space will be adequately sunlight throughout the year. The effect on this amenity area is considered to be negligible.
442. The application has assessed the impact on the commercial units on Harrow Place, several of which have outdoor seating areas. The assessment concludes that the impact of the proposed development on these units would be negligible and would accord with BRE guidance.

Impact upon efficiency of future PV panels on the Estate

443. Finally, it is understood that, as part of a community energy project, there is a plan to install photovoltaic panels on the roof of the Middlesex Street Estate blocks. As set out above, Point 2 (the Applicant's consultants) have analysed the overshadowing impact of the proposed development on the Podium amenity area and the balconies which have a view towards the application site. It has been concluded that the Proposed Development will have a negligible impact on the direct sunlight to the Middlesex Street Estate. Given the suggested location of the PV panels is more exposed to direct sunlight compared to the podium level, Point 2 have concluded that the Proposed Development

will also have a negligible effect to the roof of the MSE. This conclusion is accepted by Officers.

444. It is also worth noting that solar panels tend to rely on solar energy (or 'irradiation') rather than direct sunlight. Whilst there may be certain times of day on certain days of the year when the amount of time the sun directly hits the roof will be slightly less compared to the existing setting, the Proposed Development should not harm the overall efficacy of the proposed solar panels.

Overshadowing Conclusion

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

Solar Glare and Light Pollution

Solar Glare

446. Local Plan policy DM10.1 requires all developments to avoid intrusive solar glare impacts on the surrounding townscape and public realm. Draft City Plan policy DE8 requires developments to incorporate design measures to mitigate adverse solar glare effects on surrounding buildings and townscape.
447. Four viewpoints have been identified and assessed for solar glare impact: travelling southeast on Houndsditch, travelling northeast on the cycle path on Goring Street and travelling south/southwest on Harrow Place from two locations.
448. The assessment results demonstrate that in all of these scenarios the solar reflectance would fall within an approaching driver's far peripheral vision and not obscure any apparent traffic signals or pedestrian crossings.
449. The effect on road users is therefore considered to be no greater than minor adverse and not significant.
450. The development would be in accordance with Local Plan policy DM10.1 and City Plan 2036 policy DE8.

Light Pollution

451. Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.
452. The Proposed Development would include lighting to improve the legibility of the public realm. The applicant has explained that control systems would ensure that lighting levels are appropriate for different times of the day, and energy consumption and light intrusion is reduced.
453. The interior lighting of the lobby and podium levels would be highly visible through the glazed façade. The application has explained that lighting controls would also be used to adjust the lighting to appropriate

levels for the time of evening or night, so that it appears balanced with the surrounding public realm.

- 454. Lighting to the planting on the balconies and terraces would be switched off at night to minimise unnecessary energy use and limit the impact on the surrounding area. Lighting would be directed towards plants to minimise direct light spill into the sky.
- 455. The internal lighting of the office will be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of nearby residents. This will be achieved by designing the first 1.5m depth behind the façade glazing to be free from lighting where practical and where present it will use luminaires with low brightness and low glare. All luminaires will be dimmable and switched off when a room is unoccupied.
- 456. An objection has been received raising concern about internal lights being left on when the building is not occupied. A condition is recommended requiring a lighting strategy, which would include internal lighting levels and how this has been designed together with management measures to reduce glare and light trespass.
- 457. Subject to the recommended condition, the proposed development would comply with the Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9.

Overbearing / Dominance

- 458. Objections have been received stating that the proposed building would be overbearing and have an impact on their outlook.
- 459. The proposed development would be located 32m from the closest point on the Middlesex Street Estate and 27m from 3 and 3A Devonshire Square and would not be in the direct view from inside of the flats as it is located at an oblique angle from the residential blocks and tower.
- 460. It is therefore considered that it would not have a significant impact.

Overlooking

- 461. The shaping and design of the terraces have been designed to avoid any impact on overlooking of neighbouring residential properties, specifically Petticoat Tower, Petticoat Apartments and 3/3A Devonshire Square.
- 462. Due to the distance, angle and relative heights of the terraces it is considered that none of the residential properties would be directly overlooked. The applicant has considered planter and balustrade locations to avoid any direct views, and the balconies have been angled to avoid any instances of overlooking.
- 463. Similarly, due to the separation distance and angle of the buildings there would be no direct overlooking of residential properties from within the proposed office floors. The façade mullions/transoms and facade planting provide a further physical barrier which would prevent overlooking.

Wind Microclimate

464. Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. CFD simulation and analysis has also been carried out in accordance with the City's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.
465. Wind conditions are compared with the intended pedestrian use of the various locations including carriageways, footways and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Wind Microclimate Guidelines, being 5 Comfort Categories defining conditions suitable for frequent sitting / occasional sitting / standing / walking / Uncomfortable.
466. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
467. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance - if conditions become unsafe or unsuitable for the intended use as a result of the development. If wind conditions become windier but remain in a category suitable for intended use, or if there is a negligible or beneficial effect, wind mitigation is not required.
468. Assessments have been carried out for both the Windiest Season and the Summer Season.
469. The wind tunnel and CFD results broadly give the same assessment results. Where there is variance this would only be by one category. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.
470. The following configurations have been assessed:
- Existing site with existing surrounding buildings (Baseline Conditions)
 - Proposed development with existing surrounding buildings
 - Proposed development with existing surrounding buildings and existing landscaping
 - Existing site with consented cumulative schemes
 - Proposed scheme with consented cumulative schemes

Existing Baseline Conditions

471. The baseline scenario indicates that the Site and nearby surrounding area has conditions ranging from suitable for frequent sitting to standing use during the windiest season. In some areas during the summer

season, wind conditions are one category calmer, but still range from suitable for frequent sitting to standing use.

- 472. No strong winds exceeding the safety threshold would occur.
- 473. All roads and thoroughfare locations within and around the Site have wind conditions suitable for frequent sitting to standing use during the windiest season.
- 474. The existing entrances around the Site have wind conditions suitable for frequent sitting to standing use during the windiest season. The existing on-site entrances have wind conditions suitable for occasional sitting during the windiest season. These wind conditions are suitable for entrance use.
- 475. Pedestrian crossings around the Site have wind conditions ranging from suitable for occasional sitting to standing use during the windiest season.
- 476. The bus stop on Houndsditch has wind conditions suitable for occasional sitting during the windiest season.
- 477. Ground level amenity spaces around the Site have wind conditions suitable for frequent sitting and occasional sitting during the summer season. Areas with occasional sitting conditions are windier than suitable as there are seating provisions allocated in these areas.
- 478. Podium amenity spaces on Middlesex Street Estate have wind conditions suitable for frequent sitting and occasional sitting during the summer season. These wind conditions are suitable for a large public and private terrace space.

Proposed Development with Existing Surrounding Buildings

- 479. In the presence of the Proposed Development, conditions would increase in windiness compared to the existing scenario in some locations. Conditions would still range from suitable for frequent sitting to standing use

Roads and Thoroughfares

- 480. In the presence of the proposed development, all roads and thoroughfares would experience wind conditions which are suitable for the intended use (standing conditions or calmer). This would be considered to be a negligible impact.
- 481. Windier conditions compared to the existing would occur at three road locations (which would be suitable for standing use). These conditions would remain suitable for the intended use.
- 482. A few off-site thoroughfares would have conditions up to two categories windier compared to the baseline scenario, suitable for occasional sitting and standing use during the windiest season. On-site thoroughfares would have wind conditions suitable for frequent sitting to standing use during the windiest season. These wind conditions would remain suitable for the intended use.

Entrances

- 483. Entrances to the Proposed Development would have wind conditions mainly suitable for frequent sitting and occasional sitting, with two instances of standing use during the windiest season. These are appropriate for their intended use.
- 484. All entrances to the surrounding buildings would have wind conditions suitable for standing use or calmer during the windiest season.
- 485. Wind conditions at some surrounding entrances (measurement locations 80, 95, 110, 148, 161, 163) would become windier than in the baseline scenario, suitable for occasional sitting use at worst. These conditions would remain suitable for the intended use; therefore, no mitigation would be required.

Pedestrian Crossings

- 486. Wind conditions at the off-site pedestrian crossings would be suitable for occasional sitting during the windiest season. Wind conditions at measurement location 55 would be one category calmer than in baseline scenario. This would represent a Negligible effect.

Bus Stop

- 487. The bus stop on Houndsditch Road would have wind conditions suitable for occasional sitting during the windiest season, as per the baseline scenario.

Amenity Spaces – Ground Level

On-Site

- 488. On-site ground level amenity spaces would have wind conditions suitable for frequent sitting to standing use during the summer season. Frequent sitting in two locations (measurement locations 125 and 136) would be one category calmer than required for the intended use.
- 489. Standing conditions at measurement location 43 and occasional sitting conditions at measurement location 121 would be one category windier than suitable for the intended use during the summer season. This would represent a Moderate Adverse effect and would require mitigation (discussed below).

Off-Site

- 490. Off-site amenity spaces would have wind conditions ranging from suitable for frequent sitting use to occasional sitting use during the summer season.
- 491. Windier conditions compared to the baseline scenario suitable for occasional sitting use would occur at measurement locations 82 and 89 (Devonshire Square), 151 and 159 (Harrow Place), and the corner of Stoney Lane in the summer season.
- 492. With the inclusion of the existing landscaping into the wind tunnel test, the conditions at measurement locations 82, 89, 151 and 159 would be suitable for frequent sitting, as in the Baseline scenario.

493. Windier conditions in comparison to the baseline scenario would still occur at the spill out seating represented by measurement location 181 (corner of Stoney Lane), which has frequent sitting conditions in the baseline scenario, and would have occasional sitting conditions with the inclusion of the Proposed Development and existing landscaping. Spill out seating adjacent to measurement location 181, represented by measurement location 182 would have suitable conditions in comparison to the baseline scenario with frequent sitting use during the summer season, one category calmer than in the baseline scenario. As the suitability of the entire seating area remains consistent with the baseline scenario this would represent a Negligible effect and no wind mitigation measures are proposed.

Amenity Spaces – Podium

494. Similar to the Baseline Scenario, podium amenity spaces on Middlesex Street Estate would have wind conditions suitable for frequent sitting and occasional sitting during the summer season. This would represent a Negligible effect.

Amenity Spaces – Upper On-Site Levels

495. Roof terrace amenity spaces on the Proposed Development would have wind conditions suitable for frequent, occasional sitting and standing use (measurement locations 197 and 198) during the summer season. This would be acceptable provided seating provisions (such as benches or planter seating) will be included in areas suitable for occasional use or calmer use during the summer season. If seating is to be allocated in areas suitable for standing use this would require mitigation measures to be implemented.
496. Private balcony amenity spaces of the Proposed Development would have wind conditions suitable for frequent sitting and occasional sitting during the summer season. This is acceptable for private amenity use.

Strong Winds

497. There would be no exceedance of the safety threshold at ground level and at any part of the terraces that would be accessible to users.

Mitigation

498. The inclusion of the existing landscaping provides mitigation to several ground level amenity locations, off-site at measurement locations 82, 89, 151 and 159.
499. The following areas of the Proposed Development would require wind mitigation measures to improve wind conditions such that the location would be suitable for the intended pedestrian use:
- Proposed on-site occasional outdoor seating space with conditions suitable for standing use during the summer season (measurement location 43);
 - Proposed on-site café seating area with occasional sitting use (measurement location 121); and

- Roof terrace areas with standing conditions (measurement locations 197 and 198) if seating provisions are allocated in this area.
500. The addition of 1.5m tall hedges or at least 50% close porous screens on adjacent sides of the seating area would be expected to provide beneficial shelter to these seating areas. Alternatively, moving these seating provisions to areas suitable for frequent sitting use along the eastern side of Cutler Street (West) (measurement locations 125, 128 and 130) would also mitigate these areas.
501. The proposed landscaping scheme for the terraces would be expected to provide beneficial shelter. The proposed trees will be a minimum of 3-4m in height. However, if seating is allocated in areas suitable for standing use during the summer season providing localised shelter to the seating areas in the form of dense planting or hedging at least 1.5m in height or hard screening at least 1.5m in height and no more than 50% open porosity would provide beneficial shelter. With the inclusion of these measures the roof terrace seating provisions would be expected to have wind conditions suitable for occasional sitting use during the summer season.
502. With the inclusion of these measures ground level amenity spaces at the Proposed Development would be expected to have wind conditions suitable for the intended use during the summer season.

Cumulative Impacts

503. The potential wind microclimate impacts have also been assessed incorporating cumulative approved surrounding developments located within a 450m radius of the site.
504. With the inclusion of the cumulative schemes, some locations have become windier, generally changing by one comfort category. The categories throughout the site and surroundings would remain between frequent sitting and standing use, with all locations being appropriate for their intended use, except those identified in the Proposed Development with Existing Surrounding Buildings above.

Wind Microclimate Conclusion

505. In conclusion, where wind conditions become windier at ground level and upper level terraces, they remain suitable for the intended uses in the proposed scenario and so no additional mitigation above that proposed is required. The details of the proposed mitigation measures identified above will be secured by condition and will be required to be maintained throughout the life of the building.
506. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the CFD analysis against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the submitted application, and if any

material adverse impacts are realised, mitigation measure would need to be explored and implemented.

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

Thermal Comfort Assessment

508. London Plan Policy D8 and D9 and Draft City Plan 2036 Policy S8 indicates that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings - wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Draft City Plan Strategic Policy S12 requires developers to take account of the potential microclimate and thermal comfort impacts from tall building development at an early stage in the design process. Draft City Plan Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.
509. In accordance with the City of London Thermal Comfort Guidelines a thermal comfort assessment has been prepared. The technique involves merging wind, sunlight, temperature and humidity microclimate data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.
510. The Universal Thermal Climate Index (UTCI) metric will be utilized for predicting thermal comfort. The usage categories for thermal comfort is set out below and is used to define the categorization of a given location.

Usage Category	% of hours with Acceptable UTCI	Description
All Season	≥90% in each season	Appropriate for use all year round (e.g. parks)
Seasonal	≥90% spring-autumn AND	Appropriate for use during most of the year (e.g. outdoor dining).

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

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

Existing Baseline Conditions

Ground Level

512. The vast majority of the current pedestrian realm in the area surrounding the Site has seasonal or all-season thermal comfort conditions, with short term and short term seasonal thermal comfort conditions around 100 Bishopsgate due to the increased windiness associated with these tall buildings.

513. The majority of the areas in the pedestrian realm around the existing Site have suitable thermal comfort conditions for their intended uses. The exception is at the seating area north of 110 Bishopsgate, where short term thermal comfort conditions were predicted. It should be noted that trees present in this area were not included in the modelling, which are likely to improve conditions in comparison to what has been predicted.

Off-site Podium and Terrace Level

514. All of the existing off-site podium and roof level terraces have short-term thermal comfort conditions or better with some areas (110 Bishopsgate, 6-8 Bishopsgate, The Willis Building and 120 Fenchurch Street) experiencing short-term seasonal thermal comfort conditions in small areas. As none of the existing off-site podium or roof level terraces have sensitive receptors that would require long term comfort, these thermal comfort conditions are considered suitable for their current usage.

Proposed Building with Existing Surrounding Buildings

Ground Level

515. At ground level, thermal comfort conditions with the Proposed Development in situ would generally remain similar to the baseline conditions. There would be areas changing between all season and seasonal thermal comfort conditions, such as along Devonshire Square, White Kennett Street, and Harrow Place. Conditions around the northern corner of 100 Bishopsgate were predicted to improve somewhat. The size of the zone with short-term seasonal thermal comfort conditions shrinks compared to the existing condition.
516. Along the southern façade of the Proposed Development, an area of short-term thermal comfort conditions is predicted; however, this area would be highway, and thoroughfare adjoining the entrance of the building with no fixed seating proposed to be situated in this space, conditions are suitable for the intended use.

On-Site Terrace Levels

517. The terraces on the Proposed Development would largely have all season thermal comfort conditions. Smaller areas of seasonal thermal comfort conditions on the majority of levels also exist as do isolated areas of short-term thermal comfort conditions on the 23rd level. Overall, it is considered that the conditions on the terraces would be suitable for the intended use.

Off-Site Podium and Terrace Level

518. The introduction of the Proposed Development would not have any material impact on the thermal comfort conditions of the existing podium and roof level amenity spaces in the local area. As such the thermal comfort conditions of the surrounding podium and roof terrace levels would be the same as those presented in the baseline scenario (Configuration 1), which were suitable for the intended use.

Proposed Building with Consented Cumulative Surrounding Buildings

Ground Level

519. With the introduction of nearby consented cumulative schemes, thermal comfort conditions remain generally similar to the proposed building with existing surrounding buildings scenario (Configuration 2), although worth noting that the area with short term thermal comfort conditions along the southern facade of the Proposed Development shrinks with the consented surrounding schemes in place. The northern corner of 100 Bishopsgate would have isolated areas of short term seasonal thermal comfort conditions, similar to the baseline scenario. Areas of short-term thermal comfort conditions are now predicted around 30 St Mary Axe and the consented 1 Undershaft scheme. However, conditions would still be suitable for their intended uses. This is also true of the thermal comfort within the proposed new public realm.

On-Site Terrace Levels

520. Thermal comfort conditions at the on-site terrace level areas would be same as in the proposed building with existing surrounding buildings scenario (Configuration 2), as such all on-site terrace level areas would be suitable for the intended use.

Off-Site Podium and Terrace Level

521. The introduction of the Cumulative schemes does not alter the thermal comfort conditions of the existing surrounding podium and roof level terraces to a level that would be incompatible with their uses. All terraces expected to have short-term thermal comfort conditions or better and only small areas of short-term seasonal conditions. As such all existing off-site podium and roof level terraces would have suitable thermal comfort conditions for the intended use under this configuration.
522. The podium level of 50 Fenchurch Street would have isolated areas of short term seasonal thermal comfort conditions; however, landscaping was not included in the modelling, which may improve conditions in comparison to what has been predicted. Other podium and roof level terraces introduced with the consented cumulative schemes would all have short-term, seasonal, or all-season thermal comfort conditions, suitable conditions for their intended use.

Thermal Comfort Conclusion

523. The introduction of the proposed development would not be predicted to change the thermal comfort conditions at ground level or surrounding podium or terraces to the point that they would be incompatible with the current or proposed use types. The terrace levels of the Proposed Development would have predominantly 'all season' and 'seasonal' thermal comfort conditions, acceptable for their intended use.

Noise and Vibration

524. Local Plan policy DM15.7 and London Plan policies D13 and D14 require developers to consider the impact of their developments on the noise environment.
525. The submitted Environmental Statement includes an assessment of the impact from noise and vibration on the surrounding area, including noise and vibration from the enabling works, and demolition and construction; noise from the proposed development during operation; and noise associated with increases in traffic, which could be attributed to the development.
526. Generally, in City redevelopment schemes, most noise and vibration issues occur during demolition and the early construction phases. Noise and vibration mitigation, including control over working hours and types of equipment to be used, would be included in a Demolition Management Plan and Construction Management Plan to be approved by condition.
527. The proposed development included mechanical plant which would be located at both roof and basement levels. To ensure that noise from

plant is adequately controlled and minimised, conditions are recommended relating to plant noise and vibration.

528. All deliveries (including deliveries to the retail units and community centre) would take place within dedicated loading bays at basement level and would therefore have a negligible impact in terms of noise associated with unloading.
529. In order to minimise any disturbance from the retail units and community centre and terraces conditions are recommended restricting opening hours and the playing of music.

Air Quality

530. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 2036 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all developments to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI1 of the London Plan.
531. The emissions associated with vehicle trips have been assessed and should have negligible impact on the local air quality. The development would meet both the transport and building emissions benchmarks for the Air Quality Neutral Assessment.

Health Impact Assessment

532. The applicants have submitted a Health Impact Assessment (HIA) which has been based on the Healthy Urban Development Unit criteria, with adaptations to take into account the particular circumstances of the City. The Assessment concludes that the development would have an overall positive impact on health. Positive impacts include:
- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment;
 - Introduction of a new exemplary low carbon office building of the highest design quality, representing an appropriate response to the character of the area and enhancing this important gateway between the established Eastern Cluster and adjacent Middlesex Street Estate.
 - Enabling the provision of a new on and off site 'energy exchange' infrastructure to facilitate heating and hot water supply to the Middlesex Street Estate, delivering the opportunity, with CoL agreement, for significant energy and carbon savings for the local community, and future proofing to increase this benefit further.
 - Provision of a dedicated two-level community space within the building, off Cutler Street (North), with generous ground floor frontage and fully accessed at street level, creating a space for curated programmes focussed on gardening and green initiatives

and celebrating community projects designed for local groups, including schools and charities, to use for free. This space may incorporate a 'green café' and 'gardener's store' uses adding to the activation of the proposed public realm.

- Delivering an exemplary 'greened' building replacing an existing brownfield site and securing an Urban Greening Factor of 0.53, exceeding policy requirements, in addition to a significant biodiversity net gain score of 0.58 credits, compared to the existing situation of 0.00 credits. This is one of, if not the highest scores of any major scheme delivered in the City of London.
- Inclusivity and accessibility as placemaking priority areas; A car free building minimising vehicle travelling to the site along with cycle parking to support active travel
- Building and landscape design considering sustainability and climate change with Air Source Heat Pumps (ASHP)
- Building and landscape design also providing an enhanced environment for workers and site users as well as the wider public through an attractive public realm, greening measures and active travel measures; and
- Provision of community floorspace and affordable workspace providing significant public benefits to the local community.
- LEED Platinum and WELL Platinum rating is targeted.
- Although there is no gym / exercise space, a great emphasis has been put on the front-of-house cycle access and facilities, encouraging physical exercise on the way to and from work. Given that the users are also increasingly walking or running to work, the extensive changing and shower facilities are available for everyone to use.
- Green amenities are allocated on every floor, providing relaxing spaces for a break and direct access to fresh air, with spacious biodiverse terraces accessible on upper levels.

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

- Implementation of a travel plan to maximise uptake of active travel options;
- Implementation of a Delivery and Service Plan (DSP) to ensure sustainable modes and operation of freight;
- Implementation of a Construction Environmental Management Plan (CEMP) including dust, noise and vibration and hours of construction works;
- Implementation of a Construction Logistics Plan (CLP) to minimise the environmental and road traffic related impacts of the demolition and construction;

- Secure local employment and training initiatives via planning obligations
 - An Air Quality and Management Plan to minimise the impact of dust at the construction phase; and
 - The requirement for an Operational Management Plan to minimise noise at the operational and commercial uses.
534. Potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and S106 obligations.

Fire Safety

535. Policy D12 of the London Plan seeks to ensure that proposals have been designed to achieve the highest standards of fire safety, embedding these into developments at the earliest possible stage.
536. The application is accompanied by a fire safety statement which demonstrates how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of warning and escape, fire safety features and means of access for fire service personnel.
537. The statement has been assessed by District Surveyors, who noted that, in respect of mobility impaired evacuation, a great emphasis has been placed upon the need to manage this with appropriate procedures to ensure the firefighting lifts can be used before needed by the London Fire Brigade, and requested the inclusion of a condition to require a suitable management plan.
538. If planning permission were to be granted, a condition would be recommended requiring the submission of details of a Fire and Emergency Escape Strategy for all building users (including people with disabilities) with details of the means of escape, areas of refuge and fire evacuation lifts and stairs and fire service access shall be submitted to and approved in writing by the Local Planning Authority in consultation with the London Fire and Emergency Planning Authority, Building Control Health and Safety Team prior to construction of the building and the strategy shall remain in place thereafter.
539. Subject to compliance with the condition the proposed development would meet the requirements of Policy D12 of the London Plan.

Equality Impact

540. When considering the proposed development, the Public Sector Equality Duty (PSED) requires City of London to consider how the determination of the application will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.
541. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:-

- eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under this Act;
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it
542. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
543. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.
544. This application has been assessed against the Equality Act 2010 and any equality impacts identified.
545. The Applicants have held a range of meetings with stakeholders and the following stakeholders are considered to be relevant in the context of the Equalities Act:
- Bevis Marks Synagogue
 - Middlesex Street Estate Leaseholder Association
 - Local Residents
 - Worshipful Company of gardeners
 - Mansel Street Estate Gardening Club
 - Artizan Street Library and Community Centre
 - St Botolph Church
 - Church of St Katherine Cree
 - Aldgate School
 - Canon Barnet Primary School
 - St Marylebone School
546. As set out in the submitted Statement of Community Involvement (SCI), the consultation process included an engagement strategy with statutory and non- statutory community and political stakeholders, residents and neighbours in the City of London, in particular with the Middlesex Street Estate as an important immediate residential neighbour. The Applicant wrote to all neighbours, both residential and commercial, surrounding the site to invite them to take part in the consultation. This sought to understand the needs of local community groups and identify opportunities for partnership and facilitation particularly in relation to part of the public benefits of the project – notable the community space and how that space can best serve the identified stakeholder.
547. As set out earlier in the report, it is intended that the community space is a free to use dedicated community space specifically designed for the diverse local community, charity, religious, cultural/art and education groups and organisations to hold events, gatherings and exhibitions for the public to take part in.

548. Potential equality impacts to occur during the construction and operation phase of the project are users of community facilities, place of worship, residents workers and visitors to the City by changes in transport and access, neighbourhood amenity relating to air quality, noise and green infrastructure and employment and skills sector due to the creation of new economic opportunities.
549. Negative impacts on the amenity of local residents, workers, and visitors may potentially occur during the construction phase of the Proposed Development due to changes in air quality, daylight/sunlight, heightened levels of noise and vibration, and construction traffic.
550. Potential impacts of the proposed development on the nearby occupiers, have been assessed, including the impacts on the use and functionality of the spaces, including on the Bevis Marks Synagogue. Officers do not consider that they would be detrimentally impacted in so far as these spaces become unusable nor would it be considered that there would be disadvantages or material impact on any persons who share a relevant protected characteristic as identified in the Equalities Act 2010.
551. The closure of the pedestrian route along Cutler Street during the construction phase may impact pedestrian accessibility to the nearby Artizan Street Library and Community Centre, but it is not thought that this impact will be noticeable by users in the context of the existing pedestrian environment and transport access to the centre.
552. The placement of trees in the middle of the footway may have adverse impacts for partially sighted and blind people. These impacts would be mitigated through the implementation of appropriate materials to provide tactile information and tonal contrast to alert partially sighted and blind people of the presence of the trees. This would be dealt with as part of the detailed design of the S278 works.
553. In addition the proposed development has been assessed against policy GG1 of the London Plan and would be considered to support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.
554. Overall, the amenity impacts of construction and operation of the Proposed Development are expected to be minimal for impacts related to air quality, daylight and sunlight, and visual amenity. The noise impacts of the Proposed Development are expected to result in adverse amenity impacts, particularly during demolition and substructure works. These impacts will be monitored as outlined within the CEMP, but will result in an adverse equality for the duration of the demolition and substructure works. Overall, young people (incl. children), older people, pregnant women, and disabled individuals are expected to experience negative equality effects on amenity during the demolition and

construction phase and negligible equality effects during the operational phase.

Human Rights Act 1998

555. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR")).
556. Insofar that the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate.
557. As set out above, it is the view of officers that there would be no infringement of Article 9 of the ECHR, and in particular there would no infringement of the freedom to manifest religion or belief in worship, teaching, practice and observance.

CIL and Planning Obligations

558. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
559. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
560. From 1st April 2019 Mayoral CIL 2 (MCIL2) supersedes the Mayor of London's CIL and associated section 106 planning obligations charging schedule. This change removes the Mayors planning obligations for contributions towards Crossrail. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).
561. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£9,009,958	£8,649,559	£360,398

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£4,001,325	£3,801,259	£200,066
<u>City Planning Obligations</u>			
Affordable Housing	£2,627,050	£2,600,780	£26,270
Local, Training, Skills and Job Brokerage	£1,576,230	£1,560,468	£15,762
Carbon Reduction Shortfall (as designed) <i>Not indexed</i>	£1,055,925	£1,055,925	£0
Section 278 (Evaluation and Design) <i>Not indexed</i>	£100,000	£100,000	£0
Security Measures (Eastern City Cluster) <i>Not indexed</i>	£525,410	£520,156	£5,254
S106 Monitoring Charge	£5,250	£0	£5,250
Total liability in accordance with the City of London's policies	£9,891,190	£9,638,587	£252,603

City's Planning Obligations

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

- Highway Reparation and other Highways Obligations

- *(incl. Highways Schedule of Condition Survey, site access, obtaining consents, licences etc)*
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy (*Demolition & Construction*)
- Delivery and Servicing Management Plan (*including Consolidation*)
- Travel Plan (including Cycling Promotion Plan)
- Legible London Contribution (£32,000)
- Construction Monitoring Costs
- Carbon Offsetting
- Be Seen - Whole Life Carbon Monitoring
- Utility Connections
- Section 278 Agreement (*CoL*)
- Trees within Public Realm /Highway
- Public Space provision
- Cultural Implementation Strategy
- Public Art
- Community Space and Cafe provision
- Pop up retail kiosks
- Incubator space for SME's Levels 1 & 2
- Retail incubator space for SME
- Waste Heat Transfer to Middlesex Street Estate
- Lower Ground Level Storage Area for Traders of Petticoat lane Market and Pop Up Stalls and Kiosk's on Cutler street West
- Operational Management Plan

563. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement. The applicant will be required to enter into a Section 278 agreement to mitigate the impact of additional pedestrian flows in the surrounding area and to contribute towards the delivery of the London Plan policies T2 and D8. The scope of the S278 agreement will cover Houndsditch, Cutler Street West, Cutler Street North, Devonshire Square and White Kennet Street as follows;

- Footway repaving on Houndsditch, Cutler Street West and North and any works required to integrate the proposed highway to be adopted into the existing highway

- Introduction of raised tables at junctions of Houndsditch and Cutler Street West, Cutler Street West and Cutler Street North, Cutler Street North and Harrow Place/ White Kennet Street
- Changes to carriageway treatment on Cutler Street West
- Pedestrian priority measures on Devonshire Square and on White Kennet Street between Harrow Place and Stoney Lane. The City's Transport Strategy details the approach to be taken for pedestrian priority streets;
- *Pedestrian priority streets will allow access for motor vehicles, with all vehicles, including cycles, expected to give way to people walking. In some instances, streets will be fully pedestrianised or not allow motor vehicle access at certain times. The access requirements for each pedestrian priority, fully pedestrianised or timed pedestrianised street will be fully assessed as part of the project delivery process and would be subject to any necessary traffic order making procedures.*
- The potential introduction of two-way traffic movement on Cutler Street North.

564. Through the evaluation and design process opportunities to improve the streets in line with the 10 healthy streets indicators, such as additional planting and seating, will be explored.

Monitoring and Administrative Costs

565. A 10 year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.
566. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Site Specific Mitigation

567. The City will use CIL to mitigate the impact of development and provide the infrastructure necessary for the wider area. However, in some circumstances, it may be necessary additionally to seek site specific mitigation to ensure that a development is acceptable in planning terms. Other matters requiring mitigation are yet to be fully scoped.

Conclusion

568. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, and the emerging Local Plan and considering all other material considerations.
569. Objections have been received from residents and third parties relating to the massing and bulk of the development, daylight and sunlight implications, the impact on the environment, impact on the amenity of

the immediately surrounding area and buildings, and the loss of Clothier Street. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations.

570. The proposed development comprises the demolition of an unremarkable and outmoded office development and the replacement proposed delivers a high quality, triple aspect, office-led development with an outward facing socially inclusive cultural dimension and significant enhancements to the existing public realm which would meet the growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses. Strategic Policy CS1 of the City of London Local Plan 2015, emerging Policy S4 and policy 4.2 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers.
571. The building has been designed to accommodate new ways of working reflected in flexible and adaptable floorspace to meet the demands of different types of business occupiers, including incubators, start-ups and other small and medium sized companies. The office space would be complemented by publicly accessible retail, community space and useable and increased public realm with flexible possibilities to support Petticoat Lane Market including storage and infrastructure for complementary popups.
572. These benefits would significantly enhance the vibrancy to the City's streets and create an active and engaging base to the building benefitting the City's diverse communities. These include:
- Community Space at ground and mezzanine level totalling 238sq.m (GIA) of flexible and adaptable space with a focus on urban greening and gardening supporting local needs, learning, sustainability with free access to local communities and school access
 - Three retail units totalling 85sq.m (GIA) including one affordable unit (28sq.m GIA) which would be available at 60% of market rates
 - Incubator space would be provided over floors 1 and 2 (4037sq.m GIA) including 23 desk spaces at 50% of market rate
 - Opportunities for free storage space to support Petticoat Lane Market traders and the potential pop ups and kiosks along Cutler Street West will be secured through the S106 agreement and would be subject to demand and include locations, capacity, and hours of access.
573. The development would deliver high quality distinctive, world class architecture and would enrich and add visual interest to local townscape and Citywide skylines. The proposals will provide additional architectural and artistic collaborations supporting inclusiveness and working in partnership with local and diverse creatives, including heritage interpretation opportunities which would celebrate the history of area.

574. The proposal would deliver a tall building on a suitable site in accordance with Local Plan Policy CS14 and CS7, City Plan Policies S12, London Plan Policy 7.7 and London Plan D9. The proposal would not harm and would protect pan-London LVMF and local strategic views in accordance with Local Plan Policy CS13(1), London Plan Policies 7.11 and 7.12, draft City Plan 2036 Policy S13 and London Plan Policy HC4 and associated guidance in the LVMF SPG and Protected Views SPD. The proposal would preserve the OUV/significance, authenticity and integrity of the Tower of London World Heritage Site, according with associated guidance in the WHS Management Plan, Local Setting Study and LVMF SPG.
575. The proposal would preserve the special interest/significance and setting of designated heritage assets and non-designated heritage assets. The proposals would comply with the NPPF, London Plan Policy HC1, Local Plan Policies CS12 and DM12.1 and emerging policy S11, HE1 and HE2 . The proposals seek opportunities to enhance and celebrate heritage through artistic and cultural collaborations and interpretations.
576. In assessing any impacts special attention and considerable weight has been attached to statutory consultees advice and guidance including Historic England.
577. The scheme benefits from high levels of public transport accessibility, would be car-free except for two blue-badge parking spaces in the basement and would promote cycling and walking as healthy modes of travel. It would comply with the London Plan requirements for long and short stay cycle parking, including a number of short stay cycle parking spaces within the new public realm.
578. Further enhancements include improving pedestrian movement and comfort to the streets wrapping around the building by setting back the new building line. The increase in floorspace and occupation of the development places extra pressure on the comfort and safety of the City's streets. Overall, the pedestrian experience around the site is expected to significantly improve as a result of the proposals.
579. The existing Clothier Street is a service and refuse area which is poor quality in terms of public realm, safety and vibrancy and deemed to have no heritage value other than in name but does contribute to the permeability of the local area. To enable the deliverability of the scheme and its many benefits the existing route would be required to be stopped up. This impact is considered to be mitigated by the qualitative and quantitative benefits of the scheme in terms of public realm, pedestrian comfort, inclusiveness and safety. However, any stopping up would be subject to the statutory procedure.
580. The scheme delivers significant public realm enhancements, including an increase in quantity and quality of public realm. The perimeter spaces wrapping around the building would be outward facing, attractive and accessible spaces. There would be a net gain of approximately 173sq.m of new public realm and 27sq.m of public highway land.

581. The proposals would be particularly progressive and ambitious in terms of sustainability credentials for a tall building in the City of London.
- Operational carbon emissions reduced by 44% compared to a building regs compliant building, exceeding the minimum GLA requirement of 35%.
 - Whole Life-Cycle carbon emissions reduced to comply with the GLA's aspirational benchmark
 - Incorporation of thermal stores for waste heat to support development's space heating and share waste heat with the neighbouring Middlesex Street Estate
 - Targeting an ambitious low operational energy use intensity in line with the London Energy Transformation Initiative's (LETI) target of 55 kWh/m² (GIA) for the completed development. A raft of measures, e.g. relating to tenants agreements, power purchase agreements and reviewing the building services strategy are intended to be put in place to achieve this.
 - On track to achieving highest ratings for BREEAM assessment "outstanding", WELL building standard "Platinum" and LEEDS standard "Platinum".
 - Heat Rejection to Middlesex Estate to recirculate energy waste.
582. Urban greening is integral to the architecture and would be beneficial to all users of the building and would be experienced both from a distance and close proximity to the building. The planting and greening would be incorporated into the development through a combination of urban greening of the public realm and on all the buildings terraces and tree planting, thereby significantly increasing the biodiversity on site that would contribute to improvements of the wider area. The existing UGF on the site is 0.00 and the proposed is calculated at 0.53 which significantly exceeds policy requirements.
583. There is one major adverse impact on nearby open space and a small number of minor adverse impacts to nearby residential properties, in terms of loss of daylight and sunlight, and overshadowing. However, taking into account the BRE Guidance, it is considered that the proposed development would not reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, and would accord with Local Plan policy DM10.7 and Policy DE8 of the draft City Plan 2036.
584. Negative impacts during construction, such as noise and pollution, would be controlled as far as possible by the implementation of a robust Construction Environmental Management Plan and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions would minimise any future adverse impacts.

585. The impacts of the proposed development on residential amenity have been considered and it has been concluded that the impact on residential amenity would not be significant, and the development would comply with Local Plan relevant policies.
586. The environmental impacts of the proposal, including wind microclimate, thermal comfort, flood risk, and air quality have been addressed in the application documents. It is considered that the proposed development would not have any significant adverse impact upon the environmental conditions of the surrounding area, and would comply with relevant Local Plan policies.
587. This development would be a progressive approach to sustainable, circular, accessible and behavioural design and addresses many of the key issues facing the City, London and the UK by providing a state of the art workplace that contributes to the local environment, City workers and local communities and supports the agenda for the City and London's Covid recovery.
588. It is almost always the case that where major development proposals come forward in the City there is at least some degree of non-compliance with planning policies. In arriving at a decision, it is necessary to have regard to all the policies in the development plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
589. The Local Planning Authority must determine the application in accordance with the development plan unless other material consideration indicate otherwise. It is for the LPA to weigh the other material considerations and decide whether those that support the development outweigh the priority statute has given to the development plan, and the other material considerations which do not support the proposal.
590. Applying the approach in section 38(6) of the Planning and Compulsory Purchase Act 2004, it is considered that the proposed development complies with the development plan as a whole. Officers recommend that planning permission should be granted for the proposed development subject to all the relevant conditions being applied and planning obligations and other agreements being entered into under S106 of the Town and Country Planning Act 1990.

Background Papers

Application Submission Documents

Covering Letter	Dated 16.07.2021
Planning Statement	Dated 07.2021
Design and Access Statement ('DAS') (including Facade Access Strategy, Security Strategy, and Radiance Assessment)	Dated 07.2021
Culture Strategy and Plan	Dated 07.2021
Landscape Statement and Plans	Dated 07.2021
Lighting Strategy	Dated 13.07.2021
Environmental Statement (including Townscape Visual and Built Heritage Assessment as Volume 2)	Dated 06.07.2021
Statement of Community Involvement	Dated 07.2021
Economic and Social Benefits Assessment	Dated 07.2021
Equalities Statement	Dated 07.2021
Transport Assessment (including 'Interim Travel Plan and Cycle Promotion Plan', 'Delivery and Servicing Management Plan' and 'Pedestrian Movement Assessment')	Dated 07.2021
Waste Management Strategy	Dated 07.2021
Energy Statement	Dated 08.07.2021
Sustainability Statement	Dated 08.07.2021
Whole Life Cycle Carbon Assessment	Dated 08.07.2021
Circular Economy Statement	Dated 07.07.2021
Ventilation and Extraction Statement	Dated 09.07.2021
Utilities Statement	Dated 07.2021
Fire Strategy	Dated 16.07.2021
Flood Risk Assessment and Drainage Strategy	Dated 07.07.2021
Structural Report	Dated 08.07.2021
Phase 1 Contamination Report	Dated 06.07.2021
Biodiversity Report including biodiversity net gain assessment	Dated July 2021
Outline Construction Environmental Management Plan ('CEMP')	Dated 07.2021
Outline Construction Logistics Plan	Dated 07.2021
Thermal Comfort Assessment	Dated 15.07.2021
Radiance Report for Middlesex Street Estate (and Petticoat tower)	Dated 05.10.2021
Archaeological desk-based assessment (part of Environmental Statement)	Dated 2019
Archaeological evaluation (part of Environmental Statement)	Dated 2020
MOLA Evaluation Report (Archaeology) (part of Environmental Statement)	Dated 2020
Air Quality Assessment (part of Environmental Statement)	Dated 23.06.2021

Wind Microclimate (part of Environmental Statement)
Health Impact Assessment (part of Environmental Statement)
DP9 Response to Public Comments

Dated 10.06.2021
Dated 07.2021
Dated 28.10.2021

Consultation responses

Internal

Memo	Contract and Drainage Services	Dated 29.07.2021
Memo	Lead Local Flood Authority	Dated 26.08.2021
Memo	Access Team	Dated 06.09.2021
Email	Open Spaces	Dated 12.10.2021
Memo	District Surveyors	Dated 18.10.2021
Email	Cleansing Services	Dated 19.10.2021
Memo	Environmental Health	Dated 20.10.2021
Memo	Air Quality Officer	Dated 20.10.2021
Email	City Police	Dated 01.11.2021

External

Letter	Historic England	Dated 29.07.2021
Email	NATS Safeguarding	Dated 22.10.2021
Email	Transport for London	Dated 19.08.2021
Letter	Natural England	Dated 12.08.2021
Email	Crossrail Ltd	Dated 06.08.2021
Email	Network Rail	Dated 02.08.2021
Letter	Environment Agency	Dated 21.10.2021
Email	London Borough of Hackney	Dated 15.08.2021
Letter	London Borough of Tower Hamlets	Dated 13.08.2021
Email	Thames Water	Dated 06.08.2021

Representations

Email	Linda Fallon	Dated 11.08.2021
Email	Ms. Sandra Mc Bean Ruiz	Dated 13.08.2021

Online	Mr Alberto Mascella	Dated 19.08.2021
Online	Mr Jeffrey Boloten	Dated 25.08.2021
Email	Mark Lemanski	Dated 27.08.2021
Online	Ms Vicky Stewart	Dated 27.08.2021
Online	Mr Roger Way	Dated 29.08.2021
Online	Miss Inese Smukste	Dated 29.08.2021
Online	Miss Soo Cheong	Dated 29.08.2021
Online	Mr Shahram Najafi	Dated 29.08.2021
Online	Mrs Laura Chan x2	Dated 29.08.2021
Online	Miss Astrid Kirchne	Dated 29.08.2021
Online	Mr Paul Braithwaite	Dated 29.08.2021
Online	Mr Sean Lee	Dated 29.08.2021
Online	Mr Ian Hartog	Dated 30.08.2021
Online	Ms Lisa Hollick	Dated 30.08.2021
Email	Martha Perez Ruiz	Dated 30.08.2021
Online	Mr Giuliano Pistoni	Dated 30.08.2021
Online	Miss Liz Woolcock	Dated 30.08.2021
Online	Mr Andre Skeete	Dated 30.08.2021
Online	Mrs Philomena Levy	Dated 30.08.2021
Online	Mr Ray Ruzzaman	Dated 30.08.2021
Email	Julian Bailey	Dated 30.08.2021
Online	Ms Silvia Montoto	Dated 07.09.2021
Email	Lana Joyce	Dated 05.10.2021
Online	Miss Anna Godefroy	Dated 20.10.2021
Email	Damien Vaugh	Dated 26.10.2021
Email	Miss Vicky Stewart	Dated 28.10.2021
Email	Ms. Sandra Mc Bean Ruiz	Dated 04.11.2021

APPENDIX A

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Reasoned Conclusions

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

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of that report. The conclusions have been integrated into the decision as to whether planning permission should be granted.

The applicants and the City agreed the scope of the EIA prior to its submission. The ES provides details of the EIA methodology, alternatives and design evolution, the proposed development, demolition and construction, socio-economics, traffic and transport, air quality, noise & vibration, archaeology (buried heritage), wind microclimate, daylight sunlight overshadowing solar glare & light pollution, effect interactions, likely significant effects and conclusions, mitigation and monitoring schedule, and townscape visual and built heritage assessment, including technical appendices and non-technical summary. It is considered that the likely significant effects of the proposed development on the environment are as described in the ES as, where relevant, referred to in the report.

The local planning authority is satisfied that the environmental statement includes a description of the likely significant effects of the potential range of uses comprised in the proposed development on the environment.

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the Construction Environmental Management Plan, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, as well as other measures to ensure the scheme is acceptable. These would be secured and monitored through the S106 agreement, recommended conditions and the S278 agreements. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions.

APPENDIX B

Relevant London Plan Policies

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

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

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

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

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

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

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

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

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

minimise intrusive lighting infrastructure and reduce light pollution."

Policy D9 (Tall Buildings) sets out criteria where tall and large buildings will be considered acceptable, in principle. This includes the need to "incorporate the highest standards of architecture and materials, including sustainable design and construction practices ...[to] ...have ground floor activities that provide a positive relationship to the surrounding streets ... [to] ... contribute to improving the permeability of the site and wider area, where possible ... [and to] ... make a significant contribution to local regeneration". There is also a requirement for proposed tall buildings to be assessed in terms of potential adverse effects on their surroundings in terms of microclimate, wind turbulence, overshadowing and noise.

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

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

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

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

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

Policy E2 (Providing suitable business space) states that Boroughs should seek to "support the provision, and where appropriate, protection of a range of B Use Class business space, in terms of type, use and size, at an appropriate

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

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

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

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

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

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

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

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

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

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

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

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

Policy SI2 (Minimising greenhouse gas emissions) requires that all new major development should be net zero-carbon. Major development proposals should also include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

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

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

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

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

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

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

Policy T2 (Healthy streets) encourages development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Proposals should "1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance; 2) reduce the dominance of vehicles on London's streets whether stationary or moving; 3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport."

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

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

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

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

Policy T7 (Deliveries, servicing and construction) states that "development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not

possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

Relevant GLA Supplementary Planning Guidance (SPG):

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

Relevant Draft City Plan 2036 Policies

S1 Healthy and inclusive city

HL1 Inclusive buildings and spaces

HL2 Air quality

HL3 Noise and light pollution

HL4 Contaminated land and water quality

HL6 Public toilets

HL9 Health Impact Assessments

S2 Safe and Secure City

SA1 Crowded Places

SA3 Designing in security

HS3 Residential environment

S4 Offices

OF1 Office development

S5 Retailing

RE2 Retail links

S6 Culture, Visitors and the Night -time Economy

CV2 Provision of Visitor Facilities

CV5 Public Art

S7 Smart Infrastructure and Utilities
S8 Design
DE1 Sustainability requirements
DE2 New development
DE3 Public realm
DE5 Terraces and viewing galleries
DE6 Shopfronts
DE8 Daylight and sunlight
DE9 Lighting
S9 Vehicular transport and servicing
VT1 The impacts of development on transport
VT2 Freight and servicing
VT3 Vehicle Parking
S10 Active travel and healthy streets
AT1 Pedestrian movement
AT2 Active travel including cycling
AT3 Cycle parking
S11 Historic environment
HE1 Managing change to heritage assets
HE2 Ancient monuments and archaeology
HE3 Setting of the Tower of London World Heritage Site
S12 Tall Buildings
S13 Protected Views
S14 Open spaces and green infrastructure
OS1 Protection and Provision of Open Spaces
OS2 City greening
OS3 Biodiversity
OS4 Trees
S15 Climate resilience and flood risk
CR1 Overheating and Urban Heat Island effect
CR3 Sustainable drainage systems (SuDS)
S16 Circular economy and waste
CE1 Zero Waste City
S21 City Cluster
S27 Planning contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

Air Quality SPD (July 2017);
Archaeology and Development Guidance SPD (July 2017);
City Lighting Strategy (October 2018);
City Transport Strategy (May 2019);
City Waste Strategy 2013-2020 (January 2014);
Protected Views SPD (January 2012);
City of London's Wind Microclimate Guidelines (2019);
Planning Obligations SPD (July 2014);
Open Space Strategy (2016);
Office Use SPD (2015);
City Public Realm (2016);
Cultural Strategy 2018 – 2022 (2018).

Other

Tower of London World Heritage Site Management Plan

Relevant Local Plan Policies

DM1.1 Protection of office accommodation

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

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

DM1.2 Protection of large office sites

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

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

CS1 Provide additional offices

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

DM1.3 Small and medium business units

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

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

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

DM1.5 Mixed uses in commercial areas

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

CS2 Facilitate utilities infrastructure

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

DM2.1 Infrastructure provision

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

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

CS3 Ensure security from crime/terrorism

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

DM3.2 Security measures

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

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

CS4 Seek planning contributions

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

CS7 Meet challenges of Eastern Cluster

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 of the City.

CS10 Promote high quality environment

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

DM10.1 New development

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

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

- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

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

DM10.3 Roof gardens and terraces

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

DM10.4 Environmental enhancement

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

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

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

DM10.7 Daylight and sunlight

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

DM10.8 Access and inclusive design

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

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

CS11 Encourage art, heritage and culture

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

CS12 Conserve or enhance heritage assets

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

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.4 Archaeology

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

CS13 Protect/enhance significant views

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

CS14 Tall buildings in suitable places

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

CS15 Creation of sustainable development

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

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
 - a) BREEAM or Code for Sustainable Homes pre-assessment;
 - b) an energy statement in line with London Plan requirements;
 - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

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

non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered
3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

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

DM15.5 Climate change resilience

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

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

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

CS16 Improving transport and travel

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

DM16.1 Transport impacts of development

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

DM16.2 Pedestrian movement

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

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

DM16.3 Cycle parking

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

DM16.4 Encouraging active travel

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

DM16.5 Parking and servicing standards

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

parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

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

CS17 Minimising and managing waste

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

DM17.1 Provision for waste

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

DM17.2 Designing out construction waste

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

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

CS18 Minimise flood risk

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

DM18.2 Sustainable drainage systems

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

DM18.3 Flood protection and climate

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

CS19 Improve open space and biodiversity

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and

quality of open spaces and green infrastructure, while enhancing biodiversity.

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.
2. New open space should:
 - a) be publicly accessible where feasible; this may be achieved through a legal agreement;
 - b) provide a high quality environment;
 - c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
 - d) have regard to biodiversity and the creation of green corridors;
 - e) have regard to acoustic design to minimise noise and create tranquil spaces.
3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

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

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

CS20 Improve retail facilities

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

DM20.3 Retail uses elsewhere

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

DM21.3 Residential environment

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

CS22 Maximise community facilities

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

DM22.1 Social and community facilities

1. To resist the loss of social and community facilities unless:
 - a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
 - b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
 - c) it has been demonstrated that there is no demand for another similar use on site.
2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it

has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.

3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:

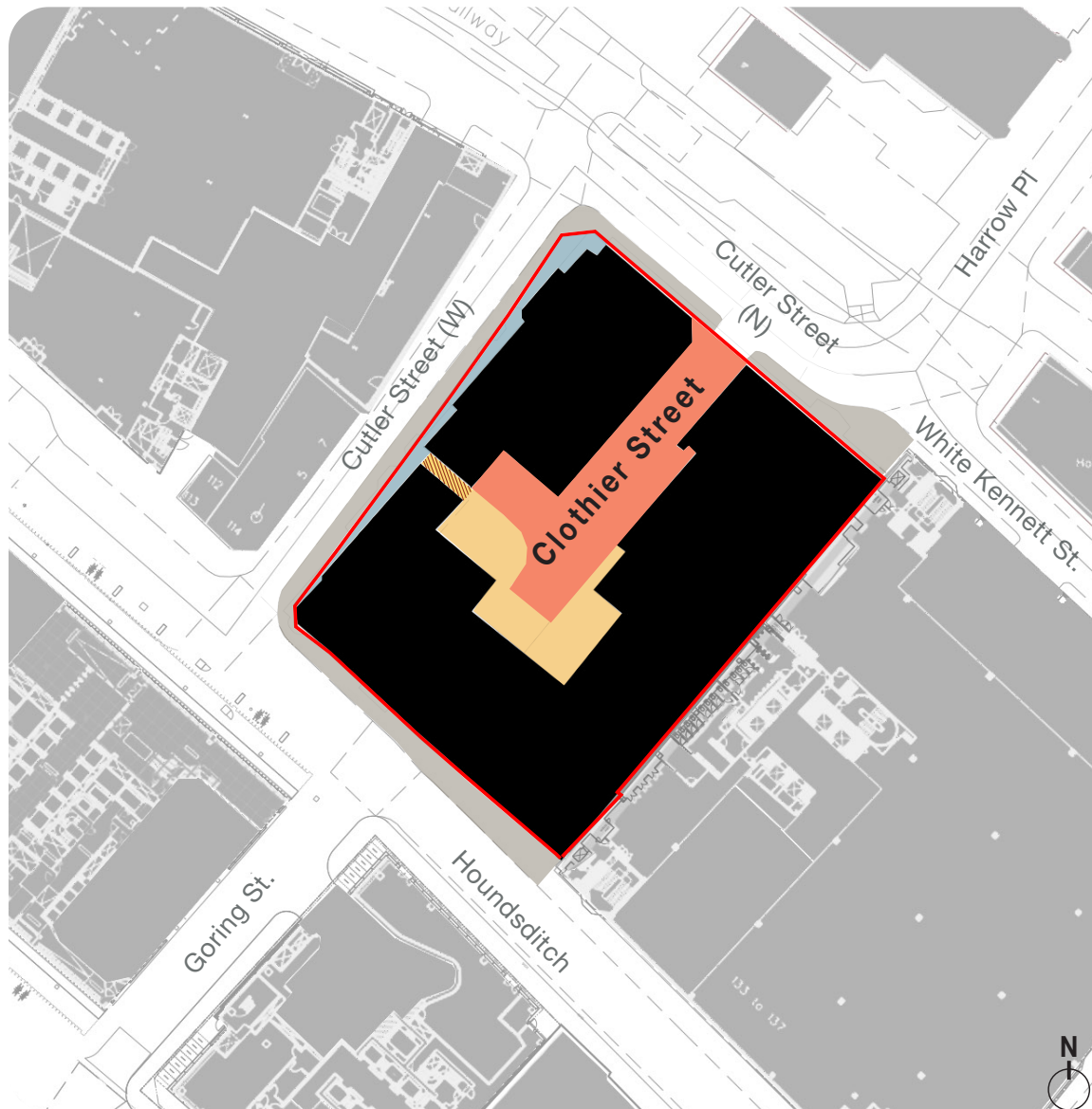
- a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
- b) in locations which are convenient to the communities they serve;
- c) in or near identified residential areas, providing their amenity is safeguarded;
- d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.

4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

APPENDIX C

Stopping Up Plan and Plan of Highway to be declared

Existing Site Ownership



Area of Highway to be Stopped Up at Clothier Street
344.98 sqm*

Private passageway to Clothier Street (publicly accessible)

Private service area/bin store/informal parking (no public access)

Publicly accessible pavement within the Site boundary

Publicly accessible pavement outside the Site boundary

**Figure as advised by City of London on 02.11.2021*

Proposed Public Realm and New Public Highway Area



Area of Highway to be declared at
Cutler Street/Houndsditch
372.72 sqm*

Publicly accessible private
land / Public Realm

Publicly accessible pavement
outside the Site boundary

**Figure as advised by City of London on 02.11.2021*

SCHEDULE

APPLICATION: 21/00622/FULEIA

115 - 123 Houndsditch London EC3A 7BU

Demolition of existing buildings and construction of a new building comprising four basement levels (plus one basement mezzanine), ground floor plus 23 upper storeys, including office use (Class E), flexible retail / cafe use (Class E); community space (Sui Generis), ancillary basement cycle parking, servicing and plant; new public realm and highway works; and other works associated with the development.

(The proposed development would provide 56,533sq.m GIA of office floorspace (Class E), 85sq.m GIA of flexible retail / cafe floorspace (Class E), 238sq.m GIA of community floorspace (Sui Generis) and 10,011sq.m GIA of ancillary floorspace; Total floorspace 66,867 sq.m; Overall Height 116.995m AOD).

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

CONDITIONS

- 1** The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2** Prior to any stripping-out or demolition of the existing building, an updated material audit of the building should be submitted to and approved in writing by the Local Planning Authority to understand the value of it as a material bank, establishing what can be retained and what can be re-used either on-site, in the first instance, re-used off-site or recycled, with the presumption that as little waste as possible is generated and the development shall be carried out in accordance with the approved details.
REASON: To ensure that the Local Planning Authority can be satisfied that the proposed development will be designed to promote circular economy principles to reduce waste and encourage recycling, reducing impact on virgin resources in accordance with the following policies in the Development Plan and the draft Development Plans: London Plan; GG5, GG6, D3, SI 7, SI 8 - Local Plan; CS17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of

recycling and minimised waste from the time that demolition and construction start.

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

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

- 4 There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme.

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

- 5 Prior to the commencement of development, the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the guidelines.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

- 6 Prior to the commencement of development a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.

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

- 7 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

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

- 8 Prior to the commencement of the development an update to the approved Circular Economy Strategy shall be submitted to and approved in writing by the Local Planning Authority, to reaffirm the proposed strategy or demonstrate improvements, and that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The

development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.

REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction starts.

- 9 Prior to the commencement of the development a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the Whole Life Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's aspirational benchmarks set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life cycle of the development.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

- 10 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.
Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. The remediation

scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Within 3 months of completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 11 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: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

- 12 No works of excavation beyond the existing basement shall take place before details of the 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 policy of the Local Plan: DM12.4.

- 13 Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not

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

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

- 14 Prior to the commencement of the development (other than demolition), an updated energy strategy shall be submitted to and approved in writing by the Local Planning Authority, providing details on how the development would reduce carbon emissions in particular from the incorporation of roof and facade mounted PV panels if identified as an effective measure to reduce carbon emissions.

REASON: To demonstrate that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

- 15 No development other than demolition shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.

REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 16 Prior to construction (excluding any works of demolition) the submission of details of a Fire and Emergency Escape Strategy for all building users (including people with disabilities) including details of the means of escape, areas of refuge and fire evacuation lifts and stairs and fire service access shall be submitted to and approved in writing by the Local Planning Authority (after consultation with the London Fire Brigade, Building Control Health and Safety Team) and the strategy

shall remain in place thereafter. The development shall be carried out in accordance with the approved Fire and Emergency Escape Strategy details.

REASON: In the interests of the safety of occupants of the buildings in the event of a fire or emergency in accordance with City of London Local Plan policy CS3.

- 17 No development other than demolition shall begin until details of such measures as are necessary within the site to resist structural damage and to protect the approved building and the new public realm within the site, from an attack with a road vehicle or road vehicle borne explosive device, have been submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun. The development shall be carried out in accordance with the approved details.

REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 18 Prior to construction, details of the equipment for the Heat Transfer system to the Middlesex Street Estate and thermal storage facilities within the site shall be submitted to and approved in writing by the Local Planning Authority. The approved equipment and thermal storage facilities shall be installed prior to occupation of the development and remain in situ for the lifetime of the development.

REASON: To minimise carbon emissions in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
- 19 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the Local Planning Authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 20 No piling shall take place until a piling method statement (detailing the depth and 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.

- 21 There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme.

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

- 22 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

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

- 23 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, pumps, green and blue roof systems, green walls, rainwater harvesting systems including the irrigation system, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 0.4l/s from the existing sewer connection, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 53m³;
 - (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
 - (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory; and
 - (d) Clarification on whether the attenuation tank will discharge via a pumped or gravity fed system.
- REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3
- 24 No construction shall take place within 5m of the water main unless otherwise agreed with Thames Water. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.
- REASON: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure.
- 25 Before the works thereby affected are begun sample panels of agreed sections of the facades shall be built, inspected on-site (or by another agreed method) and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details.
- REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

- 26 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and samples of the materials, to be used on all external and semi-external faces of the building and surface treatments where the public would have access, including external ground and upper level surfaces, including details of compliance with approved Circular Economy Strategy;
 - (b) details of the proposed new facades including details of a typical bay of the development for each facade, fenestration, soffits, terracotta piers and clear details, aluminium clad piers, facade planters, unitised curtain walling systems, handrails and balustrades;
 - (c) details of canopies;
 - (d) irrespective of approved drawings, typical facade details, including jointing and any necessary expansion/movement joints;
 - (e) irrespective of approved drawings details of ground elevations including all, integrated seating;
 - (f) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;
 - (g) details of all drainage, irrigation and rainwater harvesting;
 - (h) details of the integration of M&E and building services into the external envelope;
 - (i) details of retail units;
 - (j) details of the community use unit;
 - (k) details of servicing bay including internal colour scheme and lighting;
 - (l) details of the internal Y-props and soffit to lower levels including colours and materials;
 - (m) details of the roof top mechanical plant including integrated green wall screening.
- REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.
- 27 Before any works thereby affected are begun details and the location and specification of the PV panels shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.
- REASON: To ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.
- 28 Details of the position and size of the green/blue roof(s), the type of planting and the contribution of the green/blue roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those

approved details and maintained as approved for the life of the development.

REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

- 29 All unbuilt surfaces, including terraces/balconies and public realm, shall be treated in accordance with a landscaping scheme, including details of:
- (a) the position, size and types of planting of the green roof, green roof, climbers and within planters;
 - (b) details of the final Urban Greening Factor of the scheme;
 - (c) Irrigation, including provision for harvesting rainwater run-off from road ground and roof surfaces to supplement irrigation;
 - (d) Soil including details of the type and depths of soil and substrates;
 - (e) Species and selection of trees including details of its their age, growing habit, girth of trunk, how many times transplanted, root development and contribution to enhance biodiversity;
 - (f) Planting pit size and construction, tree guards;
 - (g) Details of all soft landscaping including species and contribution to enhance biodiversity;
 - (h) Seating;
 - (i) Paving materials;
 - (j) maintenance plans for all proposed landscaping.
- to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.
- REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.
- 30 Before any works thereby affected are begun details of measures to prevent jumping or falling from the development shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be in place prior to occupation and remain in situ for the lifetime of the development.
- REASON: In the interests of safety in accordance with the following polices of the draft City Plan 2036: DE2 and DE5.
- 31 Prior to any plant being installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished

development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.

REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6

- 32 Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036
- 33 Before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.
REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.
- 34 Before the shell and core of the building is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Local Lead Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) A Lifetime Maintenance Plan for the SuDS system to include:
 - a full description of how the system would work, its aims and objections and the flow control arrangements
 - A Maintenance Inspection Checklist/Log;

- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3

- 35 A post construction BREEAM assessment demonstrating that a target rating of 'Outstanding' 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 'Outstanding' 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 Local Plan: CS15, DM15.1, DM15.2.
- 36 Within 6 months of completion details must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.
REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation
- 37 No cooking shall take place within any Class E use hereby approved until fume extract arrangements and ventilation or another agreed system have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.
REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.
- 38 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 39 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.
REASON: In order to protect the amenities of commercial occupiers in the building in accordance with the following policy of the Local Plan: DM15.7.
- 40 The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.
A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall submitted to and approved in writing by the Local Planning Authority.
REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.
- 41 Prior to first occupation details of signage and interpretation to include the history of the site shall be submitted to and approved in writing by the Local Planning Authority, to include location, materials and fixing details. The signage shall be installed on site in accordance with the approved details and remain in situ for the lifetime of the development.
REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.1.
- 42 No part of the development shall be occupied until confirmation has been provided and agreed with the Local Authority in consultation with Thames Water that either:
(a) all water network upgrades required to accommodate the additional flows to serve the development have been completed; or
(b) a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied.
Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.
REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional

demand anticipated from the new development. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning

- 43 Once the building construction is completed and prior to the development being occupied (or, if earlier, prior to the development being handed over to a new owner or proposed occupier) a post-completion Circular Economy report shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.
REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.
- 44 Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received no more than three months post as-built design completion, unless otherwise agreed.
REASON: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.
- 45 Prior to occupation of the building hereby permitted the following details relating to external signage shall be submitted to and approved in writing by the Local Planning Authority and all signage placed on the development site shall be in accordance with the approved details:
- (a) A Signage Strategy for the retail units;
 - (b) A Signage Strategy for the community centre; and
 - (c) A Signage Strategy for the short term cycle parking within the basement.
- All signage relating to the short term cycle parking (as approved in the signage strategy) must be erected and in place prior to occupation of the building.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following

policies of the Local Plan: DM10.1, DM10.5, DM10.8, DM12.1, DM12.2 and DM15.7.

- 46 Archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological evaluation work.
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 Local Plan: DM12.4.
- 47 All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.
REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3
- 48 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 49 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 50 No live or recorded music that can be heard outside the premises shall be played.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 51 No amplified or other music shall be played on the roof terraces.

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

- 52 The terraces and balconies hereby permitted shall not be used or accessed between the hours of 23.00hrs on one day and 07.00 hrs on the following day, other than in the case of emergency.

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

- 53 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.

REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.

- 54 The pass doors shown adjacent to or near the to the main entrance on the drawings hereby approved shall remain unlocked and available for use at all times when the adjacent revolving doors are unlocked.

REASON: In order to ensure that disabled people are not discriminated against and to comply with the following policy of the Local Plan: DM10.8.

- 55 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 948 long stay pedal cycle spaces, and a minimum of 33 short stay pedal cycle spaces. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.

REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3

- 56 A minimum of 5% of the long stay cycle spaces shall be accessible for adapted cycles.

REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy T5 cycling B, emerging City Plan policy 6.3.24.

- 57 948 lockers and 94 showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.

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

- 58 Unless otherwise agreed a clear unobstructed minimum headroom of 5m must be maintained for the life of the building in the refuse skip collection area as shown on the approved drawings and a clear unobstructed minimum headroom of 4.75m must be provided and maintained over the remaining areas and access ways.
REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with the following policy of the Local Plan: DM16.5.
- 59 The loading and unloading areas at basement level must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.
- 60 Goods, including fuel, delivered or collected by vehicles (excluding cycles and motorcycles) arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.
- 61 Facilities must be provided and maintained for the life of the development so that vehicles may enter and leave the building by driving in a forward direction.
REASON: To ensure satisfactory servicing facilities and in the interests of public safety in accordance with the following policy of the Local Plan: DM16.5.
- 62 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 Local Plan: DM10.8, DM16.2.
- 63 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.
- 64 Two electric charging points shall be provided within the delivery and servicing area and retained for the life of the building.

REASON: To further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS16 and draft Local Plan 2036: VT2.

- 65 The two car parking spaces suitable for use by disabled people shall be provided on the premises in accordance with the drawings hereby approved and shall be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors.
REASON: To ensure provision of suitable parking for disabled people in accordance with the following policies of the Local Plan: DM16.5, draft Local Plan 2036: 6.13D and 6A.2 and London Plan: T6.5.
- 66 Two electric charging points must be provided for the blue badge parking spaces and retained for the life of the building.
REASON: To further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS16 and draft Local Plan 2036: VT2.
- 67 All ecological data gathered to support this application and gathered as part of ongoing monitoring to inform management, shall be submitted to the relevant Local Environmental Records Centre (LERC) currently Greenspace Information for Greater London (www.gigl.org.uk).
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 68 The retail premises hereby permitted shall not be open to customers between the hours of (23:00) on one day and (07:00) on the following day.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 69 The areas shown on the approved drawings as offices (Class E), retail use (Class E), and community use (Sui Generis) shall be used for those purposes only and for no other purpose (including any other purpose in Class E and Sui Generis as appropriate) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument amending or revoking and re-enacting that Order with or without modification.
REASON: To ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.2.
- 70 No plant or telecommunications equipment shall be installed on the exterior of the buildings, including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any

statutory instrument revoking and re-enacting that Order with or without modification.

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

- 71 The development shall provide:
- 58,284 sq.m. (GEA) of office floorspace (Class E);
 - 98 sq.m. (GEA) retail use (Class E); and
 - 259 sq.m (GEA) of publicly accessible community use floorspace (Sui Generis)

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

- 72 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:

18136-AHMM-ZZ-01-DR-A-PL 101 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 102 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 103 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 104 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 105 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 106 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 107 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 108 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 109 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 110 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 111 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 112 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 113 Rev P01
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18136-AHMM-ZZ-01-DR-A-PL 116 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 117 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 118 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 119 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 120 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 121 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 122 Rev P01
18136-AHMM-ZZ-01-DR-A-PL 123 Rev P00
18136-AHMM-ZZ-01-DR-A-PL 124 Rev P01
18136-AHMM-ZZ-B1-DR-A-PL099 Rev P00
18136-AHMM-ZZ-B2-DR-A-PL098 Rev P00
18136-AHMM-ZZ-B3-DR-A-PL097 Rev P00
18136-AHMM-ZZ-B4-DR-A-PL095 Rev P00
18136-AHMM-ZZ-B4M-DR-A-PL096 Rev P00
18136-AHMM-ZZ-GF-DR-A-PL100 Rev P01
18136-AHMM-ZZ-GF-DR-A-PL100M Rev P00
18136-AHMM-ZZ-RF-DR-A-PL125 Rev P00
18136-AHMM-ZZ-XX-DR-A-PL200 Rev P01
18136-AHMM-ZZ-XX-DR-A-PL201 Rev P01

18136-AHMM-ZZ-XX-DR-A-PL202 Rev P01

18136-AHMM-ZZ-XX-DR-A-PL203 Rev P01

18136-AHMM-ZZ-XX-DR-A-PL300 Rev P01

18136-AHMM-ZZ-XX-DR-A-PL301 Rev P01

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 Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

- 2 The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.

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

Office £185 sq.m

Retail £165 sq.m

Hotel £140 sq.m

All other uses £80 per sq.m

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

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

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

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil).

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

- 3 Any Building Proposal which includes catering facilities will be required to be constructed with adequate grease traps to the satisfaction of Thames Water Utilities Ltd or their contractor.
- 4 The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.