

<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	26 April 2022
<b>Subject:</b> 15 Minories, 57-60 & 62 Aldgate High Street And 1 Little Somerset Street London EC3  Demolition of existing structures, and erection of a mixed use office building, including ground floor flexible retail/cafe/commercial uses (Class E) and a public house (sui generis) (35,672 sqm GEA).	<b>Public</b>
<b>Ward:</b> Tower	<b>For Decision</b>
<b>Registered No:</b> 16/00406/FULMAJ	<b>Registered on:</b> 7 July 2016
<b>Conservation Area:</b>	<b>Listed Building:</b> No

### Summary

The application site occupies land bounded by Aldgate High Street to the north, the Aldgate Bus Station to the west, Little Somerset Street to the east and 16 Minories to the south.

It comprises: 62 Aldgate High Street, 57-60 Aldgate High Street, the Still and Star Public House, part of the site formerly occupied by 15 Minories (now demolished), an area of open space and the northernmost part of Little Somerset Street.

In 2014 planning permission was granted for office development on the site, as part of a wider scheme that included the change of use of 16 Minories to a hotel and the erection of a new residential building to the south. The hotel opened in 2021 and the residential building has been constructed to shell and core. Construction has not begun on the office element of the scheme.

In July 2016 an application was submitted which related solely to the office element of the 2014 scheme. It revised the design of the office building following the applicant's acquisition of 58-60 Aldgate High Street and the Still and Star Public House. As part of this proposal all buildings on the site would be demolished. A new office development was proposed with retail space at ground floor level alongside a new, reimagined version of the Still and Star public house. Members resolved to grant planning permission for the scheme in December 2020 (herein referred to as the RTG scheme). The planning permission has not been issued for the RTG scheme.

The applicant seeks further revisions to the RTG scheme which are the subject of this report. The revisions seek to improve: the quality of the

proposed public realm, scheme buildability, the environmental and sustainability credentials of the development and the ability of the development to respond to post pandemic occupier needs. Furthermore, the amendments seek to address concerns from the adjoining occupier at 55 - 56 Aldgate High Street over the design of the party wall and its impact on future development potential. Alterations would be made to the massing, the structural configuration of the building, landscaping and public realm and the environmental performance of the development. Notwithstanding the revisions, the scheme still maintains the overarching design principles of the RTG scheme and would comprise office development, with retail use at ground floor level adjacent to a re-imagined Still and Star public house.

Eight letters of objection have been received in conjunction with the revisions. The concerns relate to the design of the proposal, the loss of the Still and Star public house, the need for more office space in the City and the amount of embodied carbon that the development would generate. The London and Middlesex Archaeological Society have raised concerns over the loss of the Still and Star and the alteration of Little Somerset Street. The London Borough of Tower Hamlets have expressed concerns about the impact of the scheme on relevant LVMF views.

A conditional letter of support has been submitted from the owners of 55 - 56 Aldgate High Street. The owners of the adjoining site welcome the approach of the applicant's project team and support the revisions to the scheme providing that the amendments to the eastern flank are permanently secured for the life of the development via condition and through the S.106 agreement.

The representations that were considered in conjunction with the RTG scheme are also a consideration where they have not been withdrawn or superseded.

It is considered that the revised scheme would achieve the regeneration of an underutilised site in a pivotal location off Aldgate High Street. The proposal would deliver office space with logical floor plates, a new social and cultural facility for the City through the provision of a uniquely reimagined historic pub and an improved contribution to the townscape forming a bookend to the smaller Aldgate High Street frontages.

The proposed quantum of office floorspace is welcomed and would contribute to the City's role as a leading centre for business and employment in line with the London Plan and the Local Plan. The retail floorspace would enliven the area and would provide facilities for neighbouring communities. The pedestrian routes and public realm improvements would enhance the area. The scheme would align with the aspirations for the Aldgate area as set out in the Local Plan.

When the RTG scheme was considered by Members in December 2020 the Still and Star public house was an Asset of Community value. The Asset of Community Value designation lasts for five years. As such this status expired on the 15th December 2021. To date there has been no request to renew or

amend the listing and therefore the Still and Star's Asset of Community Value status has now ceased.

The proposal would involve the total loss of a non-designated heritage asset in the form of the existing Still and Star public house. This would be contrary to policies CS12 and DM12.1 of the Local Plan which seek to sustain and enhance the City's heritage assets. In applying the NPPF paragraph 203 balancing exercise, which relates to non-designated assets, this loss would be decisively outweighed by the benefits of the scheme including the provision of a newly reimagined Still and Star public house that would embody elements of the significance of the existing pub in an exemplary manner.

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 has been applied and great weight has been given to the need to the need to preserve the setting of the surrounding listed buildings St Botolph's Church (Grade I listed), Aldgate School (Grade II\* listed), 48 and 49 Aldgate High Street (Grade II listed), 47 Aldgate High Street (Grade II\* listed) and 46 Aldgate High Street (Grade II\* listed). It is not considered that the proposal would detract from the significance of the settings of the relevant listed buildings and their special architectural and historic interest would be preserved.

The proposed scheme would not harm the setting, integrity or authenticity of the Tower of London World Heritage site in accordance with policy HC2 of the London Plan, policy CS12 of the Local Plan 2015 and policy S11 of the emerging City Plan 2036.

The proposal would not harm the characteristics of composition of the strategic LVMF Townscape View 25A.1-3 (Queen's Walk), or that of a landmark element, and would preserve the viewer's ability to recognise and appreciate the Strategically Important Landmark, the Tower of London World Heritage Site, in accordance with London Plan policy HC4 and Local Plan policy CS13 (1).

The proposal would preserve views of St Botolph's Church, a Skyline Feature, and the Tower of London World Heritage Site, a City Landmark, in accordance with Local Plan Policy CS12 (2) and associated guidance in the Protected Views SPD.

Through the revisions to the scheme the applicant has enhanced the environmental performance of the building. As such an 'excellent' BREEAM rating is now being targeted compared to a 'very good' rating under the RTG scheme. Subject to conditions requiring wind mitigation the proposal would have an acceptable impact on the microclimate around the site and the quantum of proposed greening is welcomed and policy compliant.

The transport impacts of the proposal are considered to be acceptable. The proposal would result in the loss of some public highway but this would be offset by the provision of attractive and logical new pedestrian routes and through the provision of enhanced public realm.

The proposal would result in some daylight and sunlight transgressions to surrounding residential dwellings. However, taking into account BRE Guidance, the nature of the results (including some low existing daylight values), the site's location within a dense urban environment and the type of some of the residential accommodation, it is not considered that the proposal would result in an unacceptable impact on the existing properties and would not reduce the daylight to nearby dwellings to unacceptable levels such that it would warrant a refusal of planning permission.

The concerns raised under the RTG scheme by the owner of 55/56 Aldgate High Street regarding the design of the party wall of the office development prejudicing development potential of the adjoining site, have been addressed by the proposed design revisions. The mitigation measures include pushing the eastern flank closer to 55-56 Aldgate High Street, amending the north eastern façade to provide a fire rated construction and obscuring the windows in the eastern flank that sit directly above the adjoining terrace. An assessment has also been made as to the daylight/sunlight impacts of this revised office development on the proposed residential scheme currently pending consideration at 55/56 Aldgate High Street in order to ensure that this development would not prejudice the development of the adjacent site at 55/56 Aldgate High Street. Conditions and S.106 clauses are recommended to secure the revisions to the party wall.

Overall it is considered that the proposal represents high quality commercial led development that would have a positive impact on the Aldgate area.

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, and in arriving at a decision it is necessary to assess all the policies and proposals in the 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.

In this case, the proposal complies with the majority of development plan policies including those which relate to the provision of office development in the City, high quality accessible public realm and sustainable development, but is not compliant with elements of the policies regarding the conservation and enhancement of the City's heritage assets. National Planning Practice Guidance advises that conflicts between development plan policies adopted at the same time must be considered in the light of all material considerations including local priorities and needs, as guided by the NPPF. Officers consider that overall, the proposal accords with the development plan as a whole and that other material considerations also indicate that planning permission should be granted as set out in the recommendation and the schedules attached. Subject to the recommendations of this report it is recommended that planning permission be granted.

## **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;

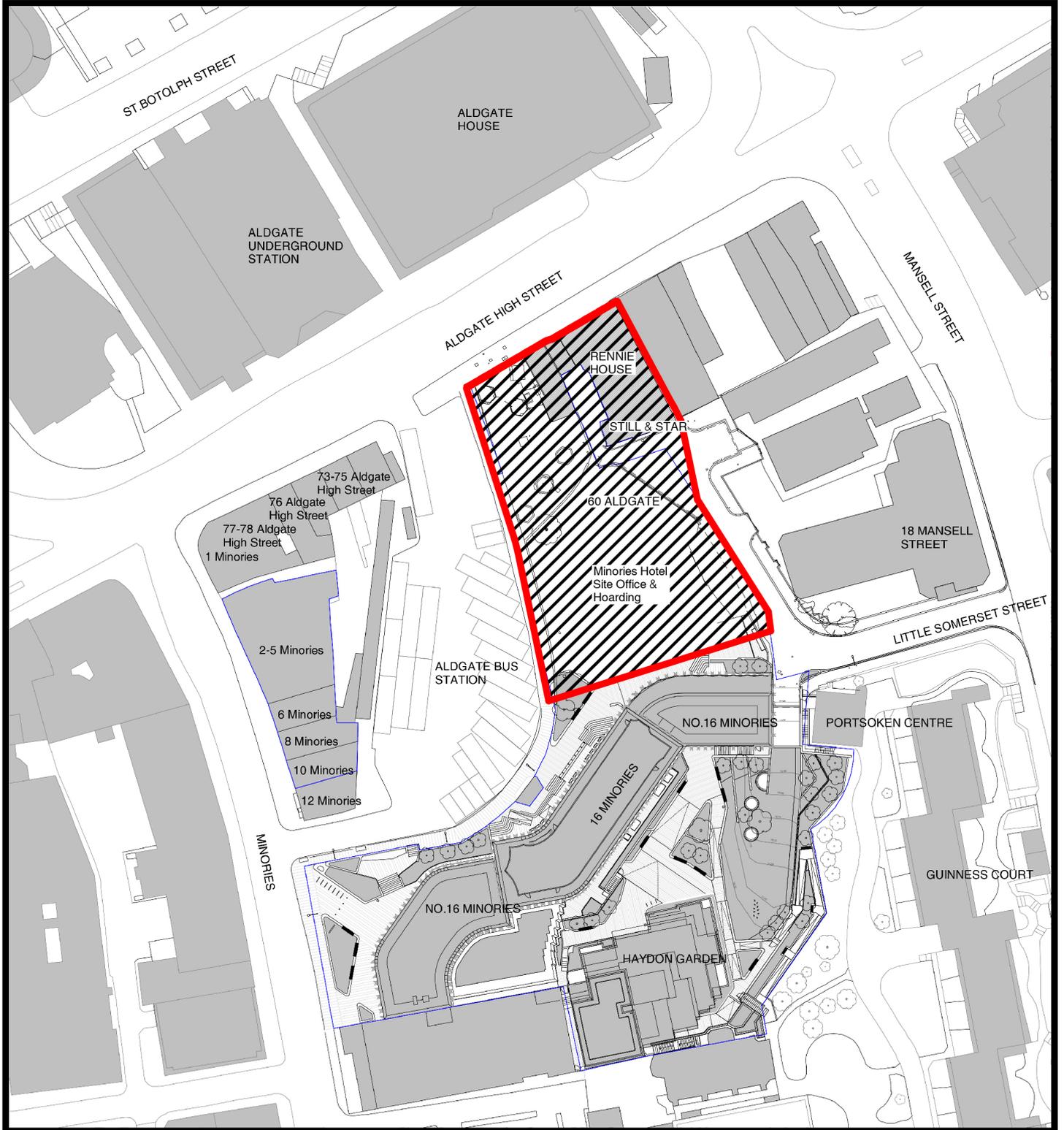
(b) That you agree in principle that the land affected by the proposal which is currently public highway and land over which the public have right of access (between Aldgate and Little Somerset Street that would be built upon if the development was implemented) may be stopped up to enable the development 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.

(c) That you agree to delegate authority to officers and the Comptroller and City Solicitor to declare new highway or city walkway through the development in accordance with the principal reservations, limitations and conditions set out in this report.

(d) That your Officers be delegated to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.

(e) An application to vary planning conditions attached to consent reference 15/01067/FULL being first submitted and approved.

# Site Location Plan



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ADDRESS: 15 Minories, 57-60 & 60 Aldgate High Street  
and 1 Little Somerset Street, London EC3

CASE No.  
16/00406/FULMAJ

-  **SITE LOCATION**
-  **LISTED BUILDINGS**
-  **CONSERVATION AREA BOUNDARY**
-  **CITY OF LONDON BOUNDARY**



## Photographs



**Existing: Looking west along Aldgate High Street from the corner of Whitechapel High Street and St Botolph Street**



**Proposed revised scheme: Looking west along Aldgate High Street from the corner of Whitechapel High Street and St Botolph Street**



**Existing: Looking east along Aldgate High Street**



**Proposed revised scheme: Looking east along Aldgate High Street**

**Background: Resolution to grant scheme, approved by Members at the 15 December 2020 Planning and Transportation Committee**



**Looking west along Aldgate High Street from the corner of Whitechapel High Street and St Botolph Street**



**Looking east along Aldgate High Street**

## **Main Report**

### **Site and Surroundings**

1. The site occupies land bounded by Aldgate High Street to the north, the Aldgate Bus Station to the west, Little Somerset Street and 55-56 Aldgate High Street to the east and the 16 Minories hotel site to the south. It comprises:
  - (i) 62 Aldgate High Street (256 sq.m) – a four storey building fronting Aldgate High Street that occupies a narrow street plot of possibly medieval origin. The front façade is thought to date from the 19th century with the exposed flank and rear elevations dating from the 20th century. The building is in retail use at ground floor level with offices above (Class E).
  - (ii) Rennie House at 57-60 Aldgate High Street (692 sq.m) – a five storey building fronting Aldgate High Street with retail use at ground floor level and offices above (Class E). Incorporated within the ground floor of the building is pedestrian access to Little Somerset Street off Aldgate High Street.
  - (iii) The Still and Star public house (sui generis, 179 sq.m), 1 Little Somerset Street – A three storey building immediately to the south of Rennie House. It dates from the 19th century with some later alterations. The building is vacant.
  - (iv) Part of the site formerly occupied by 15 Minories (now demolished) - 15 Minories was demolished in 2015 in association with the approved hotel, office and residential scheme at 15/16 Minories to the immediate south of the site, granted planning permission on 30 June 2014 (app.no. 13/01055/FULMAJ and as amended by planning permission dated 19 August 2016 app.no. 15/01067/FULL).
  - (v) An area of open space – privately owned space at the north west corner of the site fronting onto Aldgate High Street with informal seating, planters and a bronze sculpture ('Ridirich' by Keith McCarter). The space also provides a pedestrian link across the site to Little Somerset Street.
  - (vi) The northernmost part of Little Somerset Street.
  
2. The surrounding area is of mixed use and character. The closest Conservation Areas in the City are Tower Conservation Area to the south and Lloyds Avenue to the west.

3. Notable listed buildings in the vicinity are St Botolph's Church built in 1741-4 (Grade I listed), Aldgate School (1908, Grade II\* listed), 48 and 49 Aldgate High Street (1803, Grade II listed), 47 Aldgate High Street (Grade II\* listed) and 46 Aldgate High Street (mid C17, Grade II\* listed).
4. With the exception of the listed buildings, the buildings along Aldgate High Street and the north part of Mansell Street comprise C19th and 20th commercial buildings which increase in scale towards the larger buildings along Fenchurch Street and Leadenhall Street. To the south of the site is the Guinness Court, Mansell Street Estate comprising 192 residential units accommodated in 8 storey linear red brick residential blocks and the hotel and residential scheme referred to above which is currently being implemented.
5. The site is well connected to public transport with the Aldgate bus station adjacent to the site, the entrance to Aldgate Underground Station directly to the north west of the site and Aldgate East, Fenchurch Street and Tower Gateway stations in close proximity. The Circle and District Line railway lines run immediately below parts of the site which has structural implications for the proposed development.
6. In terms of area designations, the site is within the Central Activities Zone as defined by the London Plan 2021. It is within the Aldgate Key City Place Area as defined by the adopted Local Plan 2015 and is within the Aldgate, Tower and Portsoken Key Area of Change as defined by the emerging City Plan 2036.

### **Relevant Planning History**

7. In 2007 the City resolved to grant planning permission, subject to the completion of a S106 agreement, for the redevelopment at 62 & 73-78 Aldgate High Street, 1-12 & 15-16 Minories and land bounded by Little Somerset Street & Guinness Court to provide four buildings incorporating offices with a publicly accessible sky deck; retail and community use; a new entrance to Aldgate Underground Station; a temporary bus station including associated facilities followed by a permanent bus station including associated facilities, basement parking, servicing, storage and associated plant; a new covered publicly accessible open space, hard and soft landscaping and all necessary enabling works (total floorspace 134,557sq.m, 24 storeys plus basements/115.53m AOD, ). This site included part of the current application site and the Aldgate Bus Station. The S106 agreement associated with this scheme was not completed and therefore planning permission was not granted.
8. On the 30th June 2014 planning permission was granted (following completion of the related s.106 agreement), for the demolition of 15 Minories and 62 Aldgate High Street and redevelopment to provide an office building with retail use (18,537sq.m); extension, recladding and change of use of 16 Minories from offices to a hotel, restaurant and community use (17,367sq.m.); erection of a new residential building providing 87 units (7829sq.m.) and re-landscaping of open space and public realm improvements (ref. 13/01055/FULMAJ, herein referred to as

the 2014 scheme). The permission was subsequently amended under section 73 of the Town and Country Planning Act 1990 (as amended) (ref.15/01067/FULL) on the 19th August 2016 to enable changes to the residential element of the scheme (herein referred to as the 2016 scheme).

9. Works have been carried out to implement the 2016 scheme. The hotel has recently opened, and the residential element has been completed to shell and core. Work has not commenced on the office development. An application is currently under consideration (submitted on 31st March 2021 ref. 21/00271/FULMAJ) to retain the development given failure to comply with planning conditions and to enable the residential, hotel and office elements of the scheme to be delivered and occupied separately. (Details of the site separation and phasing would need to be satisfactorily resolved before planning permission could be granted for this development, hence recommendation (e). This is given that the proposed office development would need to fulfil original intentions regarding the provision and maintenance of shared open space and a shared servicing arrangement as secured by the 2016 scheme).
10. In July 2016 an application was submitted which related solely to the office element of the 2014 scheme. The design of the office building was revised following the applicant's acquisition of 58 - 60 Aldgate High Street and the Still and Star Public House. As part of this proposal all buildings on the site would be demolished. A new office building was proposed which when compared to the office element of the 2014 scheme, would extend eastwards resulting in the provision of more logical floorplates. Retail use was proposed at ground floor level. The design approach to the upper levels followed that of the 2014 scheme.
11. This scheme initially attracted significant objection primarily on design grounds and concerns over the loss of the Still and Star public house. The Still and Star was designated as an Asset of Community Value (ACV) by the City Corporation on the 15 December 2016 following an application from the Campaign for Real Ale (CAMRA). It was concluded that the public house was, or was recently used to further community benefit.
12. The applicant subsequently revised the 2016 scheme to incorporate a new public house fronting Aldgate High Street. The design of the new public house was inspired by that of the existing Still and Star and re-invented the pub in a contemporary manner.
13. Members of the Planning and Transportation Committee resolved to grant the scheme on the 15 December 2020 (herein referred to as the RTG (resolution to grant) scheme). The S.106 agreement has not been completed and planning permission has not been issued.

## **Proposal**

14. Planning permission is now sought for a revised version of the RTG scheme (to clarify the revisions have been submitted under application reference 16/00406/FULMAJ given that planning permission had not been issued. A new standalone application has not been submitted to cover the revised scheme. As such, approval of this revised scheme would supersede the RTG scheme). The revisions seek to improve: the quality of the proposed public realm, scheme buildability, the environmental and sustainability credentials of the development and the ability of the development to respond to post pandemic occupier needs.
15. Notwithstanding the revisions, the scheme still maintains the overarching design principles of the RTG scheme whereby:
  - All existing buildings on the site would be demolished.
  - An office building would be delivered that follows the architectural language of the RTG scheme with the upper facades comprising glazing overlaid with a layer of vertical mullions overlain by interlocking brise soleil aluminium fins.
  - The base of the building would comprise a striking structure that would encompass the main office entrance with associated lobby café fronting Aldgate High Street and retail fronting the adjacent hotel development to the south and the bus station to the west.
  - A new public house would be provided across basement, ground and first floor level fronting onto Aldgate High Street, with strong historical and architectural references back to the Still and Star.
  - The basement of the office building would connect directly to the basement box which has been constructed to link to the adjacent hotel and residential development to the south, to provide the shared servicing access, refuse collection and disabled car parking facilities. This arrangement was agreed and provided for under the 2016 scheme. The basement box is accessed off Little Somerset Street.
  - Pedestrian routes are provided within the arcaded structure around the base of the building. A re-aligned and widened Harrow Alley would be provided on the east side of the site in order to provide a more direct north south route from Aldgate High Street to Little Somerset Street and vice versa. A new east west route and amenity area would be provided between the south facing elevation of the development and the adjacent hotel building.

16. The scheme would be revised through:

- Small alteration of the red line boundary to include thin strips of vacant land to the west and south.
- Addition of two new levels (one office level and one plant level) plus the insertion of a mezzanine above the ground floor level in order to accommodate a back of house area.
- Reduction in the building height of level 11 to the north west to omit visibility from LVMF Protected Vista 25A.3.
- Terracing of the upper floors (level 10 upwards) to provide outdoor amenity space for the office occupiers (636 sqm).
- Addition of a third basement level to optimise the extent of plant to be located below ground and to provide space to accommodate additional cycle parking.
- Minor amendments to the massing to incorporate articulation to the facades.
- Revisions to the design of the east facing façade (movement of the eastern flank closer to 55-56 Aldgate High Street, provision of a fire rated construction and introduction of obscured windows) in order to address objections previously raised by the occupiers of 55-56 Aldgate High Street.
- Alteration of the structural arrangements for the building (change to a 'hanging' structure which is needed to avoid columns landing between the underground tunnels beneath the site as per the RTG scheme), resulting in the need for fewer columns landing at ground floor level. This combined with a smaller ground floor footprint of the office building, increases the amount of public realm that pedestrians can use around the base of the building by 83 sqm when compared to the RTG scheme (including planters the total increase in public realm would be 230 sqm when compared to the RTG scheme).
- Incorporation of a new landscaping scheme for the public realm and terraces which would increase the urban greening factor to 0.36 when compared to 0.35 in the RTG scheme.
- Internal alterations to rotate the core and structural grid alignment. This would result in a reconfiguration and reduction in the quantum of proposed retail space (402 sqm under the revised proposal and 597 sqm under the RTG scheme).
- Improvements to the environmental performance of the building, including the provision of openable windows for natural ventilation.

17. To summarise, the table below provides an overview of the office building that was consented as part of the 2016 scheme (ref 15/01067/FULL), the RTG scheme and the revised scheme.

	<b>Consented Office Building (2014)</b>	<b>RTG scheme</b>	<b>Revised scheme</b>
<b>Total Floor Area (GIA)</b>	18,060 sq.m	28,690 sq.m	33,285 sq.m
<b>Number of Storeys</b>	Basement, ground and 12 upper storeys	Two basement levels, ground and 12 upper storeys	Three basement levels, ground, mezzanine, 13 upper storeys plus one plant level
<b>Uses</b>	Office (17,492 sq.m, Class B1) and Retail (568 sq.m Class A1)	Office (27,824 sq.m, Class B1), Retail (866 sq.m Class A1, A3 and A4 includes 269 sqm for the Still and Star)	Office (32,613 sq.m), Retail (402 sq.m) (Class E), public house replacement (269 sq.m) (sui generis)
<b>Height</b>	67 m (AOD)	68.65 m (AOD)	80.14 m (AOD)

### **Consultation**

18. The applicants have submitted a Statement of Community Involvement which outlines their engagement with stakeholders prior to the submission of the revisions to the RTG scheme. Activities undertaken as part of the consultation process include (these activities supplement the consultation process that was carried out prior to the submission of the RTG scheme):
- One to one meetings – Stakeholders were identified and offered briefings on the scheme. No briefings were requested.
  - Direct Mail to Neighbours – Letters were delivered to approximately 410 residential and business addresses.
  - Print Advertising – An advert was published in the Docklands and East London Advertiser on Thursday 21 October 2021. The paper has a circulation of approximately 7,000.
  - Public Webinar – A public webinar was organised to present the revised scheme to stakeholders and allow any questions to be taken. The webinar was hosted on Zoom and took place on Thursday 28 October 2021 at 6 pm. It was attended by three people and representatives from

the project team. The webinar was recorded and distributed to local residents and stakeholders.

- Contact Centre- Throughout the consultation process, a dedicated telephone number and e-mail were promoted to ensure that stakeholders and neighbours could ask questions and provide feedback on the project. 3 enquiries were received.

19. Key themes emerging from the consultation process included:

- The project and construction timeline – a key issue was how construction would be managed. The applicant's team provided information in respect of this to the relevant queries.
- Construction communications – Local residents were keen for an existing community liaison group (the group has been operational since the 2016 application was submitted) to extend its remit and cover construction of the 60 Aldgate site. The applicant provided reassurance that this was their intent.
- Webinar recording distribution – Requests for made for the recording of the webinar. This was distributed to all stakeholders and interested parties.

20. Following receipt of the revisions the application has been advertised on site and in the press and consultation letters have been sent to surrounding residential occupiers and all those that made representations in respect of the RTG scheme. Further rounds of publicity and consultation was carried out on the 17th March 2022 and 8th April 2022 in response to additional information received by the applicant.

21. Copies of all received letters and emails making representations in respect of the revised application are attached in full and appended to this report. Eight letters of objection have been received in response to the two rounds of City consultation. A summary of the objections received in conjunction with the revised scheme, and the consultation responses is set out in the tables below.

22. One letter of conditional support has been received from the owners of 55- 56 Aldgate High Street. The owners of the adjoining site welcome the approach of the applicant's project team and support the revisions to the scheme providing that the amendments to the eastern flank are permanently secured for the life of the development via condition and through the S.106 agreement. The amendments include pushing the eastern flank of the proposed office building closer to 55-56 Aldgate High Street to reduce wind and maintenance issues, amending the north eastern façade to provide a fire rated construction from level 05 to 13 and obscuring the windows to the eastern flank that sit directly adjacent and above the adjoining terrace flank. The adjoining owners request that conditions and S.106 clauses are secured relating to the design, maintenance, cleaning and restriction of the insertion of clear glazing into the flank façade of the new office building. Furthermore, they request that the demolition and construction works are discussed with

them prior to commencement and should not impede access to the adjoining site. The requested details would be secured by condition (3, 18, 46 and 47) and the S.106 agreement.

23. The views of other City of London departments have been considered in the preparation of this redevelopment scheme and some detailed matters remain to be dealt with under conditions and the Section 106 agreement.

<b>Consultation Response</b>	
<p>CAMRA (Campaign for Real Ale)</p> <p>Officer Comments</p>	<p>A lot of additional information has been submitted. Do the proposals materially affect the design, size and provision of the replacement Still and Star pub as previously commented on. If the answer is no and the plans for the new pub remain in size, scale and design then CAMRA has no further comment to make (this is over and above the previous comments of the East London and City Branch of CAMRA on the RTG scheme whereby CAMRA would not object provided that the pub was re-provided as part of the scheme).</p> <p>Officers confirmed to CAMRA that the revised proposals would not impact on the re-provision of the Still and Star public house.</p>
<p>Thames Water</p> <p>Officer Comments</p>	<p>Thames Water have some capacity concerns which has led to the request for conditions being applied to this permission. For clean and foul water, there is an inability of the existing water networks to accommodate this development. The developer should engage with Thames Water to enable an impact study and modelling to be undertaken.</p> <p>The applicant has approached Thames Water to discuss the above. They will engage in a pre-application process with Thames Water to work through the issues.</p>
<p>Transport for London (Infrastructure protection)</p>	<p>The applicant is in communication with London Underground engineers regarding the development. Subject to the applicant fulfilling their obligations to London Underground and Transport for London then there is no objection to the proposal.</p>
<p>Transport for London (City Planning)</p>	<ul style="list-style-type: none"> <li>• The site is on Aldgate High Street which forms part of the Strategic Road Network (SRN). TfL has a duty to ensure that development does not have an adverse impact on the SRN.</li> <li>• The footway and carriageway on Aldgate High Street must not be blocked during construction.</li> <li>• In accordance with London Plan policy T4 part E, the cumulative impacts of development on</li> </ul>

<p>Officer comments</p>	<p>public transport and the road network capacity including walking and cycling, as well as associated effect on public health should be considered and mitigated.</p> <ul style="list-style-type: none"> <li>• The proposed additional long and short stay cycle parking provided to accommodate additional floorspace are in line with London Plan policy.</li> <li>• The alterations to the ground floor design and the space around the building to increase the public realm are in line with London Plan Policy T2 (Healthy Streets). To maintain good accessibility and permeability, footways should be a 2m minimum width to comply with TfL's Chapter 11.2 (Footway Zones) Streetscape Guidance.</li> <li>• Public access should be secured over the new public realm area by planning obligation or legal agreement,</li> <li>• An Infrastructure Protection Agreement (IPA) should be secured for the proposed development, meaning an agreement on London Buses Ltd (LBL)'s usual asset protection terms to protect existing and future Bus infrastructure, assets and operations in the vicinity.</li> <li>• The applicant has been advised of TfL's comments particularly with regard to the SRN and Infrastructure Protection Agreement.</li> <li>• The walking routes around the building would range in width from 3.2 to 5 metres. Public access would be secured over the new routes via the section 106 agreement.</li> </ul>
<p>London and Middlesex Archaeological Society</p>	<p>Concern over the loss of the historic significance of the Still and Star public house, a listed asset of community value and loss of Little Somerset Street, a historic thoroughfare first mentioned in 1722.</p> <p>The Still and Star is a unique example of a 'slum pub'. The proposed scheme fails to address the nature of the pub's historic significance and would not mitigate the harm caused by its destruction. The overhang of the proposed office building would dominate the new pub resulting in a loss of perspective.</p> <p>Little Somerset Street is a small urban alleyway characterised by its width and environment. The proposal as presented would replace this with a wide</p>



<p>City of London Access Officer</p>	<p>The comprehensive Access Statement is welcomed.</p> <ul style="list-style-type: none"> <li>- Consideration should be given to alternative entrance arrangements as revolving doors can be inaccessible.</li> <li>- The single pass door should be nearer the entrance doors.</li> <li>- External outward opening doors would require hazard protection unless its sole use is not for fire escape.</li> <li>- Some internal doors are too narrow and should have a minimum clear width of 800 mm.</li> <li>- The provision of the wheelchair accessible WC and facilities in basement -1 is welcomed. However, there are concerns about the length of the step free access between these facilities and the passenger lifts and drying room.</li> <li>- Any door to a cycle parking area should be automated with push button or pressure pad.</li> <li>- 5% of cycle parking spaces would be suitable for larger cycles which welcomed. Notwithstanding, there is concern that the spaces would not cater for the broad range of larger cycles, such as tricycles, handcycles and recumbent cycles.</li> <li>- The size of the terraces is constrained and lack wheelchair manoeuvring space. It is however, noted that details of the terraces will be developed including circulation, manoeuvring spaces and seating.</li> <li>- Bold surface patterns can be disorientating or misleading for people who are blind or partially sighted and people with sensory/neurological processing difficulties. There is therefore concern about the concentric paving design particularly on Harrow Alley.</li> <li>- The Still and Star entrance on Harrow Alley opens outwards and no hazard protection is proposed. It also creates a pinch point with the proposed landscaping.</li> <li>- In the RTG scheme pedestrians could move along Little Somerset Street and Harrow Alley without needing to pass through the defensive line and enter the shared space. Whereas with the amended design pedestrians would need to navigate through the numerous bollards and rock boulders to travel across the shared space which is less pedestrian friendly.</li> </ul>
<p>Officer Comments</p>	<p>The applicant has confirmed that the matters raised will be addressed at detailed design stage. Details of a revised entrance arrangement, movement of the pass door, accessible cycle parking spaces,</p>

	landscaping, HVM measures and terraces would be required by condition.
City of London Environmental Health	No objection subject to conditions.
Officer Comments	The conditions have been included in the recommendations.

Representations (Objections (8))	Number of objections
<p><b>Office floor space</b></p> <ul style="list-style-type: none"> <li>The revised plans make the floor space even larger.</li> <li>Is more generic office space needed at this time (post Covid).</li> </ul> <p><b>Officer comments:</b> The demand for office space in the City is covered in the Economic Development and Office Use sections of this report.</p>	3
<p><b>Loss of the Still and Star and adjoining part of Little Somerset Street</b></p> <ul style="list-style-type: none"> <li>The development entails the loss of historic Little Somerset Street and Still and Star Public House (an Asset of Community Value in 2016) which is unacceptable. The Still and Star Public House is a place of continuity within the City of London's history and it offers a traditional London public house built to a human scale. It is a unique record of the working class history of the area. Portsoken, as its name implies (a 'Soke' is an area of jurisdiction outside of the main boundaries) is 'without' the old City wall, and historically was an area of the more noxious trades, such as butchery. The pub, and the adjoining alleyway, are a reminder of the history of this part of the City and they should be incorporated into the proposed design.</li> </ul> <p><b>Officer Comments:</b> The loss of the Still and Star pub and part of Little Somerset Street are covered in the heritage and Still and Star sections of this report.</p>	6
<p><b>Design</b></p> <ul style="list-style-type: none"> <li>The proposed building offers nothing in the way of aesthetics.</li> </ul> <p><b>Officer comments:</b> The design credentials of the proposal are assessed in the design section of this report.</p>	1

<p><b>Embodied Carbon</b></p> <ul style="list-style-type: none"> <li>Does London need this office floorspace and the amount of embodied carbon that it would take to build it.</li> </ul> <p><b>Officer comments:</b> The carbon impacts of the proposal are set out in the sustainability section of this report.</p>	1
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## RTG Scheme Consultation

24. Representations were submitted in conjunction with the RTG scheme that still need to be given consideration in relation to the revised scheme given the majority have not been withdrawn or superseded (details of the representations are listed in Appendix A of this report. Copies of the representations are available to view at <https://democracy.cityoflondon.gov.uk/mgChooseDocPack.aspx?ID=20597>.
25. The first round of Local Planning Authority consultation in respect of the RTG scheme was carried out in 2016 (at that time the demolition of the Still and Star pub was proposed, and it was not being replaced). 270 objections were received, a summary of which is set out in the table below.
- 26.

Grounds of Objection	Number of Objections
<p><b>The loss of the Still and Star:</b> The loss of the Still and Star Public House would detract from the City’s heritage. It is a unique surviving remnant of Aldgate and London’s history.</p> <p>Such a historic building should be retained and incorporated into the design of the scheme.</p> <p>The commercial interests of the City should be weighed against the loss of this historic pub and its setting on Little Somerset Street.</p> <p>The George Tavern in Stepney was saved and the Still and Star should be too – it is an important part of British/London life and culture. It is of social value to the community.</p> <p>The pub is a tourist attraction that should be retained.</p>	221

<p><b>Officer comments:</b> The loss of the Still and Star is covered in the Heritage and Still and Star sections of this report.</p>	
<p><b>Alterations to Little Somerset Street:</b>  Little Somerset Street is a valuable part of the historic pattern of alleyways that have been in the City of London for hundreds of years. It is an integral part of the terrace of buildings on Aldgate High Street. To lose Little Somerset Street would detract from the heritage of Aldgate.</p> <p><b>Officer comments:</b> The alterations to Little Somerset Street are covered in the design and heritage sections of the report.</p>	5
<p><b>Design of the scheme:</b>  The proposed building is out of character with the scale of the area. It is another bland glass box of which there are too many across London.</p> <p>The existing paved area outside the pub gives good balance to the built-up area and is amenity space. Building over it would overshadow the road, increase wind speeds and block a useful pedestrian route used to access Aldgate Station from Mansel Street.</p> <p>The area is a nice mix of original buildings and new builds. Projects such as this risk destroying the balance and removing the character of the area and its link to the past. There are too many office blocks in the area and the existing buildings should be retained. The history of Aldgate should be preserved.</p> <p>The proposal would have archaeological implications.</p> <p>The new alleyway would be a dark tunnel.</p> <p>This ancient part of London does not have the capacity to accommodate this development in terms of increases in the number of people and traffic.</p> <p>Homes are needed and not more offices.</p>	94

<p>The amount of stopping up results in a reduction of the public realm.</p> <p><b>Officer comments:</b> The matters raised are covered in the Design and Heritage, Archaeology, Wind Microclimate, Stopping Up, Public Realm and Office sections of the report.</p>	
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27. An additional round of public consultation was carried out in early 2019 following the revisions to the design of the scheme to incorporate a new Still and Star public house. A further 42 objections were submitted in addition to one neutral representation and one letter of support.
28. 33 of the letters of objection were concerned about the impact of the proposal on the Still and Star public house which can be summarised as follows:
- Casting and moving is not the same as preserving. This iteration is not an improvement on the previous.
  - The proposal could be re-designed to incorporate the pub.
  - The ACV status should not be ignored. The existing pub could be viable if it were next to the proposed office building.
29. 15 of the letters of objection referenced design matters, which can be summarised as follows:
- Demolishing the buildings would detract from the heritage of Aldgate and compromise the setting of the grade II\* listed Hoop and Grapes public house.
  - The scheme would detract from the City's valuable street pattern.
30. The letter of support states that the proposals would improve the visual amenity of the area and give the Still and Star a new viable life.

31. The following consultee responses that were submitted in conjunction with the RTG scheme are also relevant given they have not been withdrawn or superseded by further representation:

<b>Consultee</b>	<b>Comments</b>
Environment Agency	Need not be consulted on the application and therefore have no comments.
The Victorian Society	<p>The Still and Star is a non-designated heritage asset and its demolition is a material consideration.</p> <p>The 'Still' indicates that alcohol was originally brewed on site and the 'Star' derives from the Star of David presumably a nod to the Great Synagogue of London that prior to the Blitz was located on Dukes Place and the large Jewish population in the area at the time.</p> <p>The building is unique in the City of London and it is unlikely that there are any other pubs of this sort left which makes its survival all the more remarkable.</p> <p>Little Somerset Street would also be lost by the proposal. Formerly known as Harrow Alley, it has followed its current path since the eighteenth century and is an exceptionally important piece of urban grain.</p> <p>The block facing onto Aldgate High Street in front of the Still &amp; Star was known as 'Butcher's Row'. Historically the pub doubled as a butcher's shop. The pub and Harrow Alley are documented in historic literature. The pub and alley are a tremendous microcosm of London's social history of surviving historic fabric. The pub and historic street pattern of high significance and their loss is not outweighed by the benefits of a corporate office building.</p> <p>The inclusion of a replacement building for the Still and Star is a concession to the acknowledged value of the current Still and Star and the loss that would result from its demolition. Replacement would not address the nature of the pub's significance as a</p>

	<p>building or mitigate the harm that will be caused by destruction.</p> <p>The setting of numerous listed buildings needs to be considered including 45-48 Aldgate High Street. Their setting would be harmed by the proposed office block.</p>
City Heritage Society	<ul style="list-style-type: none"> <li>- The Still and Star should be retained.</li> <li>- The buildings on Aldgate High Street form a group in scale with the important grade II* listed Hoop and Grapes.</li> <li>- The scale of the proposed building is out of sympathy with the range of buildings between the junction with Mansell Street and Minories.</li> </ul>
Historic Royal Palaces	Confirmed no comments to make on the application.

32. The objections raised to the RTG scheme are addressed in the Design and Heritage and Still and Star sections of this report.

### **Policy Context**

33. The development plan consists of the London Plan 2021 (adopted since the consideration of the RTG scheme) 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.
34. The City of London has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. Onward progress of the Plan has been temporarily paused to enable further refinement, but it remains a material consideration in the determination of applications (although not part of the development plan) alongside the adopted 2015 City of London Local Plan and the London Plan 2021. The Draft City Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
35. 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.
36. The Historic England Good Practice Advice notes, including Note 3 The Setting of Heritage Assets and Note 2 Managing Significance in Decision-Taking in the Historic Environment.

37. 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.
38. 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), City of London's Thermal Comfort Guidelines (CoL, 2020), Planning Obligations SPD (CoL, May 2021), Open Space Strategy (CoL, 2016), Office Use (CoL, 2015), City Public Realm (CoL, 2016), Cultural Strategy 2018 – 2022 (CoL, 2018) and relevant Conservation Area Summaries.

## **Considerations**

### **Relevant Statutory Duties**

39. 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).
40. In considering whether to grant planning permission for development which affects a listed building or its setting, the Corporation must 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). This duty must be given considerable weight and importance when weighing any harm to the setting of a listed building in the balance with other material considerations.

## **National Planning Policy Framework (NPPF 2021)**

41. 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”.
42. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social, and environmental.
43. 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:
    - (i) 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
    - (ii) 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.
44. 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).
45. 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.
46. Chapter 8 of the NPPF seeks to promote healthy, inclusive, and safe places. 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.

47. 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”.
48. 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.
49. 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”.
50. Chapter 12 of the NPPF seeks to achieve well designed places.
51. 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.”
52. 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.
53. 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.

54. 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.
55. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment.
56. 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.
57. 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."
58. 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.
59. 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.

60. Paragraph 202 of the NPPF states “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”. When carrying out that balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving the building or its setting.
61. 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**

62. In considering this planning application account must be taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.
63. The principal over-arching issues in considering this application are:
  - The extent to which the amended proposal complies with the relevant policies of the Development Plan.
  - The extent to which the proposals comply with Government guidance (NPPF).
  - The application of considerable weight and importance to the need to have regard to the desirability of preserving the setting of listed buildings in the vicinity.

The principal site specific issues in considering this application are:

- Economic development and the provision of office accommodation, including the provision of office accommodation in Aldgate
- The impact of the proposal in retail terms
- Considerations around the demolition and replacement of the Still and Star public house, including change to the Asset of Community Value status
- The proposal's cultural offer
- The acceptability of the scheme in design and heritage terms including design of the office, pub and public realm, the loss of the Still and Star pub as a non-designated heritage asset, impact on listed buildings,

the Tower of London World Heritage site and strategic views.

- The impact of the proposal on any archaeology beneath the site
- The accessibility and inclusivity of the development
- The impact of the proposal in highway and transportation terms
- The impact of the proposal in environmental and sustainability terms
- Whether the development would be air quality neutral
- The environmental impacts of the proposal including daylight sunlight, wind, thermal comfort, solar glare and light pollution
- Whether the development would result in noise and disturbance
- Assurance that fire safety has been embedded in the design of the scheme
- The outcome of the Health Impact Assessment
- Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010)
- Assessment of the impact of the revised scheme on 55/56 Aldgate High Street
- The requirement for financial contributions

### **Economic Development and Office Use**

64. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
65. 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 540,000 people.
66. 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.

67. 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.
68. 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.
69. 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.
70. 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.
71. 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.
72. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
73. 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.

74. 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.
75. 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.
76. The scheme meets the aims of policies in the Intend to Publish London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015 and S4 of the emerging City Plan 2036 in delivering growth in both office floorspace and employment. The current application provides for an additional increase in floorspace and employment in line with the aspirations for the CAZ and the requirements of the Local Plan and the emerging City Plan. The proposed development would result in an additional 32,613 sqm of high quality, flexible Class E office floorspace (a 4,789 sqm increase on the RTG scheme) for the City thus contributing to its attractiveness as a world leading international financial and professional services centre.
77. The office space has been designed to be flexible and adaptable through the provision of a central core with limited internal columns. The design would lend itself being either open plan office space, cellular offices or meetings rooms. Up to two tenants could be accommodated per floor plate.
78. The site is also within the Aldgate Key City Place as defined by the Local Plan 2015 (policy S8) and it is within the Aldgate, Tower and Portsoken Key Area of Change in the emerging City Plan 2036 (policy S20).
79. The Local Plan 2015 states that although there is significant potential for development in the Aldgate area environmental concerns including traffic levels, pollution and a lack of street level activity mean that the area is not as attractive for new business and investment as other areas of the City. The City Corporation aims to regenerate Aldgate by developing it into a vibrant, safe and distinctive office location, whilst remaining a sustainable place in which to live work and learn.
80. Improvements have taken place in the area during the plan period including the removal of the Aldgate Gyratory and the provision of new

public space. The emerging City Plan acknowledges commencement of the hotel development adjacent to the application site.

81. While there are a mix of uses in the Aldgate area, the Local Plan 2015 acknowledges the predominant land use is good quality, recently built or refurbished office stock dating from the 1960s to the 1990s. The plan states that the Aldgate area is capable of accommodating large-scale office development that can provide space for company headquarters or support business function. Policies CS8 of the Local Plan 2015 and policy S20 of the emerging City Plan 2036 seek to promote the Aldgate area as an attractive office location to assist in its regeneration.
82. The proposed scheme would accord with the provisions of policy CS8 of the Local Plan 2015 and policy S20 of the emerging City Plan 2036 in terms of providing office led commercial development that has the potential to contribute towards regenerating and enhancing the Aldgate area.

### **Retail Uses**

83. The existing site provides 248 sq.m of retail space across three units. Aldgate High Street is defined as a Retail Link within the Local Plan 2015.
84. The Retail Links can provide a link between the Principal Shopping Centres (PSCs), a link between PSCs and transport nodes or form convenient local centres. Policy CS20 (Retailing) of the Local Plan 2015 seeks to enhance Retail Links and policy DM20.2 (Retail Links) encourages retail provision and resists the loss of retail frontage and floorspace within the Retail Links. A mix of shops and other retail uses are encouraged along the Links, ensuring that the function of the Link is not adversely affected. Policy S8 (Aldgate) seeks to encourage local retail facilities in the Aldgate Area to meet the needs of local residents.
85. The emerging City Plan 2036 similarly seeks to encourage the provision of retail facilities in the Aldgate Area (policy S20 Aldgate, Tower and Portsoken). The Aldgate High Street Retail Link has been carried through to the City Plan with policies RE2 (retail links) and S5 (retailing) setting out aspirations for the Retail Links that are consistent with the Local Plan.
86. The existing retail units would be replaced with 402 sq.m of retail floorspace (Class E) (a 195 sqm reduction in retail space compared to the RTG scheme). The retail space would be provided across two retail units that would be located in the southern half of the ground floor and through the provision of a flexible retail offer within the lobby of the offices. Three retail units and the retail lobby offer were proposed in the RTG scheme. Although the café would be within the lobby, it would be accessible to members of the public. While there would be a reduction in the provision of retail space in the current proposal compared to the RTG scheme, the proposal would represent an uplift in retail provision of 154 sqm when compared to the current site circumstances.

87. The office and lobby cafe entrance would face onto Aldgate High Street. The frontage of the replacement Public House would follow the building line of the adjacent building to the east, 55 to 56 Aldgate High Street. The frontage of the office building including its main entrance would be set back behind the vaulted arcade.
88. Overall, the proposed 159 sq.m uplift in retail floorspace alongside the provision of a public house is welcomed in order to provide facilities for local people and enhance the function and vibrancy of the Aldgate High Street retail link in accordance with the Local Plan and the emerging City Plan 2036.

### **The Still and Star Public House**

89. As per the RTG scheme it is proposed that the existing Still and Star public house would be demolished and replaced with a new and re-imagined public house (the design of the Still and Star would remain as per that proposed under the RTG scheme). This section of the report covers the implications of the loss of the Still and Star pub in land use terms and in terms of the Asset of Community Value status. Consideration is given to the loss of the Still and Star as a non-designated heritage asset in the design and heritage sections of the report.
90. Policy HC7 (Protecting public houses) of the London Plan states that planning decisions should protect public houses where they have a heritage, economic, social or cultural value to local communities. It further states that proposals for new public houses should be supported where they would stimulate mixed use development, taking into account potential negative impacts.
91. In the supporting text to policy CV1 (Protection of Existing Visitor, Arts and Cultural Facilities) of the emerging City Plan 2036, it states that “There are many cultural facilities that are unique to the City and maintain an historic or cultural association with the Square Mile. Special consideration needs to be given to the protection of these facilities to maintain the City’s unique cultural heritage. Examples of such facilities include City Livery Halls, public houses which have a heritage, cultural, economic or social value to local communities...”. Policy CV1 states that the City Corporation will resist the loss of existing visitor, arts, heritage and cultural facilities, unless replacement facilities of at least equivalent quality are provided on-site or within the vicinity which meet the needs of the City’s communities.
92. The text further states that the City Corporation has published guidelines for determining nominations for Assets of Community Value in the City of London, which include local criteria to assess the role of public houses in furthering social wellbeing or social interest.
93. Part 5 Chapter 3 of the Localism Act 2011 introduced provisions for the designation of certain buildings or land as Assets of Community Value (ACV). Detailed regulations, the Assets of Community Value (England)

Regulations, were published in 2012 and non-statutory guidance issued by the Government in the same year.

94. The Still and Star was closed on the 2nd October 2017 and has been vacant and not operated as a public house since. It was listed as an Asset of Community Value by the City Corporation on 15th December 2016 following an application from the Campaign for Real Ale (CAMRA). The City Corporation concluded that the Still and Star public house performs a social function that furthers the social interests of the City's community. The ACV application was made following the initial submission of the RTG planning application, which originally resulted in the loss of the Still and Star.
95. The ACV designation lasts for five years. As such the ACV listing in respect of the Still and Star expired on the 15th December 2021. To date there has been no request to renew or amend the listing and therefore the Still and Star's ACV status has now ceased.
96. Notwithstanding, that the Still and Star public house is no longer listed as an ACV, the design of the Still and Star remains as per the RTG scheme. The new public house would occupy 269 sq.m of proposed floorspace (compared to 179 sq.m floorspace as existing).
97. The provision of an additional 90 sq.m of floor space for the public house is welcomed. The proposed Still and Star would more than double the amount of front of house space that would be provided when compared to the existing thus the application scheme would provide more space to socialise and utilise. Siting the pub directly onto Aldgate High Street would increase its visual prominence, result in a longer extent of pub frontage compared with the existing and it would add vibrancy to the street scene and would therefore have a positive impact on the Aldgate High Street Retail link.
98. As per the RTG scheme, the new public house would draw on the existing in that it is proposed that it would be called the Still and Star. The retention of the name would be welcomed. Details of the existing façades of the Still and Star would be scanned and replicated for that of the new Still and Star. It is proposed that a 3m tall concrete plaque would be installed on the west facing elevation of the new Still and Star and it would be etched to depict Gustave Dore's image of "Harrow Alley, Houndsditch" from 1872 which shows an image of Harrow Alley at that time. There is an aspiration that the pub could be used as a gin distillery which would draw on the historical origins of the 'Still' element of the existing public house (further details with regard to the meaning of 'Still' are set out in the design and heritage section of this report).
99. It is considered that the provision of a re-imagined Still and Star would result in a new social, community and cultural facility on the site alongside office development that would contribute towards regenerating the area and would accord with policy HC7 of the London Plan and policy CV1 of the emerging City Plan 2036. Furthermore, it should be noted that CAMRA (original applicants for the Asset of Community Value Status) do not wish to object to this revised scheme providing that the

Still and Star would be re-provided as per the RTG scheme. Conditions are recommended to secure the details of the proposed Still and Star.

### **Cultural Offer**

100. Adopted Local Plan policy CS11 seeks to provide, support, and further develop a wide range of cultural facilities and events in the City. Policy S6 of the draft City Plan 2036 seeks to enhance cultural experiences and access to a range of arts and heritage. The policy requires developers to submit Cultural Plans for major development outlining how it will contribute to the enrichment and enhancement of the City's inclusive cultural offer. These should set out how the development will contribute towards enriching and enhancing the City's cultural offer for example by incorporating cultural activities or displays in ground floor spaces; facilitating public access and providing exhibitions/interpretation boards in relation to matters of historic interest; providing permanent or temporary space for creative enterprises; and incorporating public art either within the design of the building or as freestanding structures.
101. In accordance with policy S6 of the emerging Local Plan an updated Cultural Plan has been submitted in conjunction with the revised scheme.
102. As part of the cultural offer the Ridirich Sculpture that is currently located on the site would be restored and relocated to a revised position adjacent to the hotel development. Its relocation would be secured through the S.106 agreement.
103. The re-imagining and re-interpretation of the historic Still and Star public house still forms part of the revised development's cultural offer. The revised office design would offer enhanced visibility of the pub following removal of structural office columns that landed at ground floor level in the RTG scheme. Removal of the columns would enable the pub to appear more prominent in the street scene.
104. The revised scheme still includes the intention to embed a 3m tall concrete plaque with the Harrow Alley etching of Gustave Dore in Harrow Alley, in the west facing elevation of the new Still and Star public house. Further details of which would be secured by condition.
105. The proposed Cultural Plan and its intended actions are welcomed and would be secured by condition and through the S106 agreement to ensure that the benefits are delivered in accordance with policy CS11 of the Local Plan.

### **Design**

#### **Site location and context**

106. The site of the proposed development is located on the eastern fringe of the City.
107. The surrounding area is of mixed use and character and the setting to the north is dominated by the newly landscaped Aldgate Square and the Aldgate Bus Station. Notable buildings on Aldgate High Street are the

grade I listed St Botolph's Church built in 1741-4 nearly opposite the site; to the west of the church, across Dukes Place, is the grade II\* listed Aldgate School (formerly Sir John Cass School, built 1908). To the east of the church is the entrance to Aldgate Underground Station. On the south side of Aldgate High Street, to the east of the site, are a group of listed buildings: Nos. 46 and 47, two mid-C17th houses listed grade II\*, one of which is the Hoop and Grapes public house, and Nos. 48 and 49, a two bay Georgian house circa 1803 and listed at grade II. Otherwise, the buildings in the locality comprise C19 and C20 commercial buildings which increase in scale towards Fenchurch Street and Leadenhall Street. Little Somerset Street has a historic street alignment onto which the C19 Still and Star Public House fronts.

### **Existing buildings**

108. On Aldgate High Street, Rennie House is a post-war building of brick frontage with metal-framed windows and a broad stone fascia above modern shopfronts. The westernmost side of the façade incorporates a way through to Little Somerset Street. The building is considered unexceptional intrinsically. Its frontage to Aldgate High Street makes a minor contribution to the low-rise terraced townscape here.
109. 62 Aldgate High Street is a four-storey building occupying a narrow street plot of possibly medieval origin; the front façade is thought to date from the 19th century with later exposed flank and rear elevations, possibly reconstructed over the railway tunnel. The building is considered unexceptional intrinsically. Its frontage to Aldgate High Street makes a minor contribution to the low-rise terraced townscape here.

### **Development Design**

110. The proposed development would require the demolition of all the existing buildings upon the site for a large new office block over a ground floor arcade and a new Still and Star public house. The Circle and District lines of the London Underground railway run immediately below parts of the site and have dictated the structural engineering of the main office building and the layout of the ground floor public realm. The proposed development would be conspicuously innovative in architectural terms and would provide a unique new tranche of public realm in this presently disjointed part of the City's townscape.

### **Main office building**

111. At 13 storeys high (80.135m including ground floor, roof plant and lift overrun), the proposal is similar in scale to other recent developments in the Aldgate area which are constrained by the Backdrop Assessment Area of the Protected Vista from City Hall to the Tower of London. These include Aldgate House (62m high) and the St Botolph Building (78m high). The hotel adjacent to St Botolph Church is 54m high (necessarily lower given its proximity to the grade I listed church). The height, bulk and massing of the proposed office building is considered appropriate in this townscape and wider setting context.
112. The development would be substantially higher than other, lower-scaled buildings on the south side of Aldgate High Street. Given the nature of

the site it is considered that a building of this scale at this location can be justified. In particular, the sprawl of the bus station contributes little to the townscape and has a detrimental impact on the setting of the modestly scaled buildings to its west and east. The proposed office building would visually frame this open area and bookend the smaller Aldgate High Street frontages with an innovative architectural backdrop. The massing would constitute the optimal use of a limited land resource in line with policies CS10 (2) of the Local Plan and D1 of the London Plan.

113. Strikingly, the glazed façades of the building would be overlaid with a layer of vertical mullions overlain in turn by interlocking brise soleil aluminium fins. These would impart a dynamic quality and vibrancy to the elevations. The interplay between the two layers would create a 'moiré' effect and an impression of sinuous movement, especially in oblique views of the building. The effect would be intensified by the subtle variation of the colour of the fins. Behind them, the glazing would incorporate openable panels, except to the north-east section of party wall with Nos. 55-56 Aldgate High Street, where fire-rated opaque glazing would be provided to address party wall issues. However, this difference in glazing would not be appreciable from the public realm.
114. To Aldgate High Street, an irregular ground plane of curves would be created by the ingenious resolution of the site's structural constraints by 'hanging' the building from cantilevered columns arising from positions in the middle and the south of the site. At ground floor level, a series of scoop-like indentations would create a dynamic, vaulted arcade free of columns to the northern half of the site and with only a few to the south. This arcade would encompass the whole building, with space most generously provided around the northern half of the building and in the realigned Harrow Alley to the north and east. Recalling the slaughterhouses once characterising this area, the vaulted arcade would be finished in curved and red-stained timber slats and would stand between 3.4m and 6.8m high with an average height of 5.7 m, ensuring the whole does not appear constrained or oppressive. The ground floor level of the building would be contained within curving glass walls and would incorporate the main entrance to the building and a large retail unit to the south.
115. The proposed materiality and design details of the proposed office building are of a very high quality and the intricacies of this would be secured through condition.
116. A generous walkway (between 3 and 9m wide) would be provided to the west of the arcade, adjoining the Bus Station. The combination of external walkway and arcade would significantly improve pedestrian movement across the site, especially on the key north-south route between Aldgate and the residential estate on Mansell Street. To the eastern side of the arcade, a retained, realigned Harrow Alley would pass between the office arcade and the new Still and Star public house. The latter would enliven the north-eastern corner of the site, while further retail uses would activate the building's ground floor frontages to the south, in line with policies DM10.1 (4) of the Local Plan and S8 / D3 of

the London Plan. The outline public realm treatment has been designed in accordance with the City's Public Realm SPD and associated technical guidance and details will be secured via condition. This outline treatment optimises greening, boundary treatments and security infrastructure and aligns with policies DM 10.1 (9) of the Local Plan and S8 and D3 of the London Plan.

117. The building's roof levels would echo the dramatic red arcade at the base. New terraces, sinuously curved, would be disposed about levels 10 to 13, They would provide external amenity space accessed from the offices at those levels and would incorporate extensive urban greening. The architectural elements of these terraces would be finished in red fritted glass and red metalwork balustrades. In views of the building this would be a similarly eye-catching element to the ground floor, creating a characterful roofscape enclosed by the swooping curves of the moire façade. The roofscape is a considered response which satisfactorily integrates plant and servicing, in line with policies DM 10.1 (8) of the Local Plan and S8/D3 of the London Plan.

## **Heritage**

### **The Still and Star Public House – Non-designated Heritage Asset (Direct Impact)**

#### **Harrow Alley – Non-designated Heritage Asset (Direct Impact)**

118. The Still and Star Public House is a modest, early-mid C19 public house. The building possesses undoubted interest as an example of its type, both as a 'slum pub' – a drinking establishment of domestic scale probably converted from a house – and as representing the social character and drinking culture of this period. Gin-drinking was rife and the 'Still' of the pub's name refers to a lost gin distillery within the pub. The building's exterior brick walls survive in reasonable condition, with features such as blind brick window niches on the north elevation and original window openings to the west elevation. Although the building has been heavily altered it is considered to be a non-designated heritage asset.
119. The values comprising the heritage significance of the Still and Star are deemed:

**Architectural/Artistic:** the building is of a modest scale and materiality which illustrates its early nineteenth century origins as a 'slum pub' and with later external alterations such as the early twentieth century ground floor frontage which illustrate a common trend in pub development; its alignment and relationship to Little Somerset Street reveal the lost intricacy of the historic streetscape in this location.

**Historic:** The Still and Star is a rare survival of the 'slum pub' and therefore is representative of the lower-class social conditions of late Georgian and Victorian London; furthermore, it appears in numerous historic sources including Gustav Dore's engravings of London.

**Archaeological:** limited evidential value as a result of the building's extensive alteration.

120. The existing building is framed immediately to the south and west by a route now called Little Somerset Street but formerly known as Harrow Alley, originally a narrow way amongst slaughterhouses and now last remnant of the tight-knit urban grain which characterised this locality. It is discernible on historic maps from 1799 onwards, although its form and alignment have slightly changed over time. The distinctive kink of Harrow Alley remains but the buildings now lining it bear a very different relationship to the public house. As a historic route, Harrow Alley is considered to be a non-designated heritage asset.

### *Impact*

121. The proposals would require the demolition of the Still and Star and the realignment of the original form of Harrow Alley as preserved in Little Somerset Street. A new Still and Star Public House would be provided on a new site fronting Aldgate High Street, under the with a rerouted Harrow Alley provided in between it and the main office building.
122. It is considered that the architectural merit of this proposal is comparable to the significance of the non-designated heritage asset in its present form. Although a rare survival of its kind, the existing public house's integrity has been compromised by extensive alterations. Its setting has been severely compromised by redevelopment. These proposals would reimagine this 'slum pub' and its alleyway setting but would do so in a strikingly contemporary idiom.
123. The new Still and Star public house would be located on the site's north-east corner with a slender, tapering floorplan shaped by the structural constraints of the tunnels below and evoke the kind of intimate floor plan common to many historic public houses. Within, a new gin distillery would re-establish the lost still of the existing building. The new public house would feature an interior spatially akin to that of a traditional public house but with a vibrant, contemporary scheme of decoration.
124. The principal west façade of the existing Still and Star would be replicated in the new facade, fronting Aldgate High Street. It would nestle under the crimson arcade and incorporate a planted roof terrace accessed from the office building. Each of the facades of the existing public house would be replicated in concrete casts and a sequence of them would form the long western elevation of the new public house, incorporating new punched window openings and artwork. Reimagined like this, the new public house would at once perpetuate the memory of the original building and be something entirely new.
125. The new Still and Star would be doubly innovative: as a resurrection of the original public house and, more broadly, a reimagining of the London 'slum pub' as a typology. Few precedents exist elsewhere in London for this element of the scheme. It would introduce a point of unique architectural interest to this part of the City; moreover, the existing

building's contribution to the vibrancy of this part of the City would be perpetuated.

126. Harrow Alley would be relocated a little way to the east to run between the new public house and the proposed office reception, joining the remaining stretch of Little Somerset Street further to the south. Its relationship with the new public house would convincingly echo the existing relationship between these two non-designated heritage assets.
127. The loss of the existing public house would conflict with Local Plan policies CS12 and DM12.1 which seek to sustain and enhance heritage assets, their settings and significance. NPPF para 203 requires local authorities to take into account the impact of an application on the significance of a non-designated heritage asset. Para 203 further requires a local authority to make a balanced judgement in respect of the harm or loss of a non-designated heritage asset. It is considered that the loss of the existing Still and Star public house and the architectural and historic significance it embodies, though regrettable, would be compensated for by the provision of the new Still and Star public house and the cumulative benefits accruing from this mixed-use development.
128. Furthermore, it is considered that the relocation of Harrow Alley in a more linear form adjacent to the new Still and Star public house amounts to an alteration to, rather than loss of, this non-designated heritage asset. The alleyway has undergone subtle changes in form and alignment throughout its history. The proposals would echo the original configuration of and relationship between these two non-designated heritage assets sufficiently to mitigate against the loss of its existing alignment; furthermore, it would re-introduce a sense of enclosure and would more strongly define the form of the route. It is considered that the proposals would therefore have a neutral impact on the significance of the non-designated heritage asset.

### **Designated Heritage Assets (Indirect Impacts)**

#### **St Botolph Aldgate – grade I**

##### *Significance and contribution of setting*

129. Church of 1744, of stock brick with classical stone detailing and a distinctive obelisk tower. The church possesses high architectural significance as an exemplar of Georgian neoclassical ecclesiastical design that is relatively rare in the City. It possesses high historic significance through its associations with George Dance the Elder, Clerk of the City's Works and designer of the Mansion House and with J.F. Bentley, the Victorian ecclesiastical architect of Westminster Roman Catholic Cathedral who designed internal alterations to the church. Ultimately a medieval foundation, there is further historic significance through the church's associations, through its role as a public place of worship, with past City communities and prominent City figures with connections to it such as Sir John Cass.

130. The churchyard, grade II listed gates and associated drinking fountain and police call box all contribute positively to the building's setting and architectural and historic significance. The church's architectural significance is further supported by the open space of Aldgate Square to the west and the sympathetic relationship it has, in scale and materials, with the Aldgate School. To the south, unlisted historic buildings framing the junction of Minories and Aldgate High Street make a moderate contribution to the church's architectural and historic significance by illustrating the sort of historic townscape from which it emerged and over which it presided for much of its existence. The church's setting is otherwise characterised by modern commercial buildings of medium scale to the north and north-east.

### *Impact*

131. The proposed development would be a prominent new element in the background of the church when viewed from the north-west and west. From the corner of Duke's Place, the proposed development would appear directly behind the tower though not approaching the base of the spire. In these views, the background of the church is already dominated by the adjacent hotel, which similarly intersects with the body of the tower; the proposed development would engage with the other side of the body of the tower. The architectural detailing of the body of the tower is relatively simple and, unlike a spire, does not depend on a clear sky backdrop to be perceived and appreciated. The proposed development would not encroach on the spire above, which would remain seen against clear sky in this view. Consequently it is not considered that the proposed development would be harmful to the significance of the church, merely that it would result in change to the church's setting.
132. From the south half of Aldgate Square, the proposed development would form a new element within the background of the church, albeit further away; the same relationship would be visible in longer views from Fenchurch S/Leadenhall St junction. In these views, the proposed development would be perceived as being set away from the church, further east along Aldgate High Street on the other side of the street, amongst other modern developments of comparable scale. Accordingly, it is not considered that the proposed development would be harmful to the architectural significance of the church, merely that it would result in change to the church's setting.
133. There are long views of the church looking NW from Mansell Street/Little Somerset Street. In these views, the upper tower and spire are glimpsed fleetingly against clear sky, an isolated 'moment' in which the church is seen holding its own in the context of the City Cluster. Although these views would be lost to the bulk of the proposed development, they are the exactly the sort of glimpsed, experiential views which are closed off by some developments and opened up by others, characteristic of the intense and constant change of a densely developed urban heart such as the City. Accordingly, the loss of these more distant views is not

considered to be harmful to the significance or setting of the listed building. It is considered its setting would be preserved.

**No. 46 Aldgate High Street – grade II\***

*Significance and contribution of setting*

134. House, now offices, late seventeenth century with much alteration, including modern extensions to the east and south. The diminutive scale of the frontage to Aldgate High Street and its detailing exemplify a ‘type of building once common in London but now very rare’ (official List Entry). This characteristic is shared with the Hoop and Grapes immediately to the west. A historic roof form survives to Aldgate High Street, but not to the rest of the building. The building possesses a high level of architectural significance as a rare survivor of a late seventeenth century building, with its age and character still clearly discernible in the narrow frontage, though somewhat blurred by the modern extensions to the east of the building. The building possesses further archaeological significance for the evidence it provides of urban historic timber frame construction, now very rare in a City context.
135. The listed buildings at Nos. 46 – 49 Aldgate High Street form a complimentary group. This immediate setting makes a high contribution to the architectural significance of the listed building by framing it with historic buildings of similar scale, plot widths and detailing in the case of No. 47. This is best appreciated in views looking west at the group from the junction of Mansell Street and Aldgate High Street. Immediately to the west of them, beyond the gap site, are a group of slightly higher unlisted buildings with broadly complimentary plot widths, materials and some complimentary detailing, culminating in Rennie House and No. 62 which are part of the application site. This wider, low-rise terrace setting makes a moderate contribution to the architectural significance of the listed building by illustrating the sort of granular townscape of individually different but broadly consistent buildings in which it was originally erected and in which it has stood for its entire existence – and, in the broader swathe of building ages and levels of alteration, the ever-changing nature of this kind of townscape in the City. This is best appreciated in views looking west from the junction of Mansell Street and Aldgate High Street and in views looking east from outside Aldgate Underground Station.
136. Views of the return and rear of the building from Mansell Street make a neutral contribution to significance as these elements of the building are modern extensions. Otherwise, the building is surrounded by larger modern buildings which make a neutral contribution to its significance.

*Impact*

137. The proposed development would result in the demolition of the two buildings at the end of the terrace, Rennie House and No. 62, and their replacement with the new Still and Star public house and the new office building. The location of the proposed development at the end of the

terrace, between it and the bus station, means that it would be perceived at a comfortable remove from the listed building, over forty metres away. In views of the listed building looking west, the new office building would appear as a prominent new bookend to the terrace with the curving moire façade creating a serenely modern architectural backdrop for the existing low-rise terrace, enlivened by the charismatic scarlet treatment of the ground floor arcade and roof terraces. The office building would rise above the roof of the listed building, but the roofscape here has been compromised through modern alteration and, in any case, was never conceived to be dependent on a clear sky setting to be fully appreciated. The smaller, more traditionally-scaled frontage of the new Still and Star public house would be perceived as the end of the terrace and would complement the individually varying but broadly cohesive scale of the wider low-rise terrace against which the listed building is currently seen. The listed building already possesses a modern urban context, seen against larger modern buildings in other views. In the key view west, the distance of the proposed development from the listed building and the introduction of the Still and Star public house would mean that the impression of a granular, evolutionary townscape in the wider low-rise terrace setting would be maintained. Accordingly, the listed building would experience change in its setting, but this would not be harmful to its significance. It is considered its setting would be preserved.

### **Hoop and Grapes Public House (No. 47) – grade II\***

#### *Significance and contribution of setting*

138. House and offices, late seventeenth century with subsequent alteration. A wine merchants' from at least 1803 and a public house from at least 1887. The diminutive scale of the frontage to Aldgate High Street and its detailing exemplify a 'type of building once common in London but now very rare' (official List Entry). This characteristic is shared with the neighbouring No. 46. The Hoop and Grapes has been less altered than its neighbour, though subject to extensive late twentieth century refurbishment, and its historic plan and roof form survive. The building possesses a high level of architectural significance as a rare survivor of a late seventeenth century building, with its age and character still clearly discernible in the narrow frontage and roof form. The building holds a moderate level of historic significance through its function, from at least 1887, as a public house and subsequent associations with past City communities. The building possesses further archaeological significance for the evidence it provides of urban timber frame construction, now very rare in a City context.
139. The listed buildings at Nos. 46 – 49 Aldgate High Street form a complimentary group. This immediate setting makes a high contribution to the architectural significance of the listed building by framing it with historic buildings of similar scale, plot widths and detailing in the case of neighbouring No. 46. This is best appreciated in views looking west at the group from the junction of Mansell Street and Aldgate High Street.

Immediately to the west of them, beyond the gap site, are a group of slightly higher unlisted buildings with broadly complimentary plot widths, materials and some complimentary detailing, culminating in Rennie House and No. 62 which are part of the application site. This wider, low-rise terrace setting makes a moderate contribution to the architectural significance of the listed building by illustrating the sort of granular townscape of individually different but broadly consistent buildings in which it was originally erected and in which it has stood for its entire existence – and, in the broader swathe of building ages and levels of alteration, the ever-changing nature of this kind of townscape in the City. This is best appreciated in views looking west from the junction of Mansell Street and Aldgate High Street and in views looking east from outside Aldgate Underground Station.

### *Impact*

140. The proposed development would result in the demolition of the two buildings at the end of the terrace, Rennie House and No. 62, and their replacement with the new Still and Star public house and the new office building. The location of the proposed development at the end of the terrace, between it and the bus station, means that it would be perceived at a comfortable remove from the listed building, over thirty metres away. In views of the listed building looking west, the new office building would appear as a prominent new bookend to the terrace with the curving moire façade creating a serenely modern architectural backdrop for the existing low-rise terrace, enlivened by the charismatic scarlet treatment of the ground floor arcade and roof terraces. The office building would rise above the roof of the listed building, but the building's roofscape was never conceived to be dependent on a clear sky setting to be fully appreciated. The smaller, more traditionally-scaled frontage of the new Still and Star public house would be perceived as the end of the terrace and would complement the individually varying but broadly cohesive scale of the wider low-rise terrace against which the listed building is currently seen. The listed building already possesses a modern urban context, seen against larger modern buildings in other views. In the key view west, the distance of the proposed development from the listed building and the introduction of the Still and Star public house would mean that the impression of a granular, evolutionary townscape in the wider low-rise terrace setting would be maintained. Accordingly, the listed building would experience change in its setting, but this would not be harmful to its significance. It is considered its setting would be preserved.

### **Nos. 48 and 49 Aldgate High Street – grade II**

#### Significance and contribution of setting

141. House and shop, mid-eighteenth century with subsequent alteration. The building possesses a moderate degree of architectural significance as a characteristic example of a slender Georgian brickwork frontage incorporating details typical of the period.

142. The listed buildings at Nos. 46 – 49 Aldgate High Street form a complimentary group. This immediate setting makes a high contribution to the architectural significance of the listed building by framing it to the east with historic buildings of similar scale and plot widths. This is best appreciated in views looking west at the group from the junction of Mansell Street and Aldgate High Street. Immediately to the west of them, beyond the gap site, are a group of slightly higher unlisted buildings with broadly complimentary plot widths, materials and some complimentary detailing, culminating in Rennie House and No. 62 which are part of the application site. This wider, low-rise terrace setting makes a moderate contribution to the architectural significance of the listed building by illustrating the sort of granular townscape of individually different but broadly consistent buildings in which it was originally erected and in which it has stood for its entire existence – and, in the broader swathe of building ages and levels of alteration, the ever-changing nature of this kind of townscape in the City. This is best appreciated in views looking west from the junction of Mansell Street and Aldgate High Street and in views looking east from outside Aldgate Underground Station.

#### *Impact*

143. The proposed development would result in the demolition of the two buildings at the end of the terrace, Rennie House and No. 62, and their replacement with the new Still and Star public house and the new office building. The location of the proposed development at the end of the terrace, between it and the bus station, means that it would be perceived at a comfortable remove from the listed building, over thirty metres away. In views of the listed building looking west, the new office building would appear as a prominent new bookend to the terrace with curving moire façade creating a serenely modern architectural backdrop for the existing low-rise terrace, enlivened by the charismatic scarlet treatment of the ground floor arcade and roof terraces. The office building would rise above the roof of the listed building, but the roofscape here has been compromised through modern alteration and, in any case, was never conceived to be dependent on a clear sky setting to be fully appreciated. The smaller, more traditionally-scaled frontage of the new Still and Star public house would be perceived as the end of the terrace and would complement the individually varying but broadly cohesive scale of the wider low-rise terrace against which the listed building is currently seen. The listed building already possesses a modern urban context, seen against larger modern buildings in other views. In the key view west, the distance of the proposed development from the listed building and the introduction of the Still and Star public house would mean that the impression of a granular, evolutionary townscape in the wider low-rise terrace setting would be maintained. Accordingly, the listed building would experience change in its setting, but this would not be harmful to its significance. It is considered its setting would be preserved.

## **Other listed buildings**

144. Around St Botolph's church are two grade II listed structures: the churchyard gates and gate piers and a City of London police call box. These form a group with the church and make a positive contribution to its significance. The churchyard gates are of the early nineteenth century and holds a moderate degree of architectural significance, while the police call box dates to the early twentieth century and holds a moderate degree of historic significance.
145. These heritage assets are visible in views of the application site from Fenchurch Street/Leadenhall Street junction and the south side of Aldgate Square. In these views, the proposed development would be perceived as being set away from the assets, on the other side of the street, amongst other modern developments of comparable scale. Accordingly, it is not considered that the proposed development would be harmful to the significance of these assets, merely that it would result in change to their settings.
146. The scheme would not harm the setting of the grade II\* listed Aldgate School, which lies some distance away. Its setting would be preserved.

## **Setting of the Tower of London World Heritage Site and the London View Management Framework**

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

147. 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 Strategically Important Landmark in the Protected Vista from 25A.1, the Landmark Viewing Corridor of which is focused on the White Tower. This focal point is a Protected Silhouette between the three assessment points 25A.1-3. The Monument and Tower Bridge are also identified as landmarks in these views. The LVMF recognises the juxtaposition of built elements from a variety of eras as an aspect of the view (para 413). The Tower of London World Heritage Site Local Setting Study identifies three relevant views on the south riverbank of the Thames which coincide with the three LVMF Assessment Points.
148. The Protected Vista and Protected Silhouette would remain unaffected by the proposed scheme.
149. Given the pre-eminence of the River Thames in the foreground, and the openness of the ToL ensemble defining its north bank, the ToL and White Tower would remain the dominant feature towering above these immediate surroundings. From the three Assessment Points nearly all of the scheme would be concealed by existing buildings. From Assessment Points 25A.1 and 25A.2, very limited parts of the upper storeys of the proposed office building would be visible. However, in these long views they would be only glimpsed against (and be lower than) the rooflines of other existing, modern buildings in the background of the view. From Assessment Point 25A.3, the proposed building would be entirely concealed behind the Protected Silhouette and the intervening development of St Clare House on Minories. In the kinetic experience

moving west to east through the assessment points, the upper parts of the scheme would be glimpsed as part of the existing backdrop of modern development to the west of the Tol, before disappearing entirely behind the Protected Silhouette.

150. The London Borough of Tower Hamlets have objected to the revised scheme because of the way its increase in height would make the scheme more visible in the view from assessment point 25A.1. However, the proposed scheme would still be lower than the existing modern buildings in the background and would not extend modern development any closer to the Protected Silhouette in this view. It is considered that the proposed scheme would only be glimpsed from 25A.1 and 25A.2 within the existing zone of modern development which is visible to the west of the Protected Silhouette in the background of these views.
151. Accordingly, it is considered that the proposed scheme would respect the setting of the Tower and not dominate it, in accordance with the LVMF visual management guidance at paras 414-415. 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, the principal setting from this iconic view (LVMF paras 416-417). It is considered that the proposed scheme would not compromise the Protected Vista, the Protected Silhouette or views of the Tower of London. The proposed scheme would not undermine the composition and characteristics of the view or those landmark elements. The observer would continue to recognise and appreciate the Tower of London as the Strategically Important Landmark, set away from the City and not lost in it.

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

152. 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).
153. 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 various elements of the City, rising behind the Tower, which includes prominent tall buildings of the late twentieth and early twenty-first 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). The Local Setting Study describes how this viewpoint allows for an appreciation of specific elements of the OUV including its landmark siting, its defensive location and relationship to the City.

154. The visual management guidance in the LVMF SPG states that the ToL should not be dominated by new development close to it (para 183) and focuses particularly on the relationship between the ToL and the City Cluster (paras 186-7). It says that development should not breach the skyline of the four towers of the White Tower or its castellations, and that some visual separation should be retained between the upper parts of the White Tower and the emerging cluster of tall buildings in the City.
155. At the eastern extremity of the River Prospect, the roofline of the proposed scheme would be glimpsed beside other modern development above the eastern parts of the ToL. It would not be close to the White Tower and would not dominate it. The location of the site to the east rather than the west of the River Prospect means that the visual separation of the upper parts of the White Tower and the City Cluster would be maintained. The observer would continue to recognise and appreciate the Tower of London and its landmark siting, defensive position and relationship to the City of London, all in accordance with the visual management guidance.
156. Overall, the scheme would be generally concealed from views of the Tower of London World Heritage Site from Tower Bridge and the south bank of the Thames. In this respect, the scheme would not harm and would preserve the setting and Outstanding Universal Value of the World Heritage Site.

### **City Landmarks and Skyline Features**

157. Policy CS13 (2) seeks to protect and enhance views of City Landmarks and Skyline features as identified in the Protected Views SPD. The proposed scheme would be visible in views of the Tower of London (City Landmark) and St Botolph Aldgate (City Church with a Skyline Presence). The proposed scheme would be a high quality, modern architectural backdrop to these two heritage assets, complementing their silhouettes instead of undermining their presence on the skyline.

### **Design, Heritage and Strategic Views Conclusion**

158. The proposal is considered to constitute high quality architecture and urban design that has been sensitively designed to address the constraints of the site. It is considered that it would accord with the design and broadly accord with the heritage-related policies of the London Plan (D3, D4, D5, HC1, G5), Local Plan 2015 (CS10, DM10.1, CS12, DM12.1) and the emerging City Plan 2036 (S8, DE2, DE3, DE4, DE6, HE1).
159. The impact of the loss of the Still and Star public house as a non-designated heritage asset would conflict with policies CS12 and DM21.1 of the Local Plan. However, it is considered that this would be sufficiently mitigated by the provision of a reimagined London public house in accordance with paragraph 203 of the NPPF.
160. It is considered that the rerouting of Harrow Alley alongside the new Still and Star public house would appropriately echo and reimagine the existing relationship it has with the existing public house. As such the alterations to, rather than the loss of, Harrow Alley are considered to be

in accordance with DM12.1 and would have a neutral impact on the significance of the non-designated heritage asset.

161. For the purposes of section 66 of the Town Planning (Listed Buildings and Conservation Areas) Act 1990, considerable importance and weight have been given to the desirability of preserving the setting of surrounding listed buildings. It is considered that the settings of the relevant listed buildings would be preserved by the proposed scheme.
162. The proposed scheme would not harm and would preserve the setting, integrity or authenticity of the Tower of London World Heritage site in accordance with policy HC2 of the London Plan, policy CS12 of the Local Plan 2015 and policy S11 of the emerging City Plan 2036.
163. The proposal would not harm the characteristics of composition of the strategic LVMF Townscape View 25A.1-3 (Queen's Walk), or that of a landmark element, and would preserve the viewer's ability to recognise and appreciate the Strategically Important Landmark, the ToL WHS, in accordance with London Plan policy HC4 and Local Plan policy CS13 (1).
164. The proposal would preserve views of St Botolph's Church, a Skyline Feature, and the ToL WHS, a City Landmark, in accordance with Local Plan Policy CS12 (2) and associated guidance in the Protected Views SPD.

### **Archaeology**

165. The site is an area of archaeological potential, to the east of the Roman city wall, to the south of the main road out of Aldgate, and within the Eastern Roman Cemetery. Almost all investigations in the area have recorded Roman remains, including many burials. Evidence of post-medieval developments has also been widely found, in the form of cellar walls and floors, pits and drains.
166. The potential for archaeological remains is high, however, their potential survival is low due to the 'cut and cover' London Underground Line tunnel in the north part of the site. The south and central part of the site was redeveloped in the 1970s, and recent investigations confirm no survival in this area. Elsewhere there is potential that archaeological remains survive, but the level of survival is uncertain.
167. The proposed development entails the demolition of all the existing buildings on the site; including 62 Aldgate High Street and 1 Little Somerset Street (Still and Star Public House), both of early/mid-19th century date, and the construction of a multi-storey office building. The southern half of the proposed building would have a two-storey basement with piled foundations. The northern half would overlie the existing London Underground Line and a main sewer; no basement is proposed, and the building would be cantilevered over the tunnel and sewer, supported by large diameter piles.
168. The proposed development would have an impact on archaeological remains within the site, except where archaeological remains are known to have previously been removed. The revisions to the scheme include

alterations to basements and foundations which raise no new archaeological issues.

169. Conditions are recommended to cover a programme of archaeological work, foundation design and building recording.

### **Access**

170. The scheme is supported by a comprehensive Access Report by David Bonnett Associates. Detailed consideration has been given to access issues in the design of the scheme line with polices D5 of the London Plan, DM10.8 of the Local Plan and S8 of the emerging City.
171. As set out in the consultation section of the report the City's Access Officer has queried matters relating to landscaping design and materials, terraces, door widths and the location of the pass door. Further details of the matters raised will be required by condition and addressed at detailed design stage.

### **Transport and Highways**

#### **Cycling**

172. London Plan policy T5 requires cycle parking be provided at least in accordance with the minimum requirements published in the plan. Policy T5 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.
173. The proposed cycle parking provision has been increased in line with the increase in floorspace when compared to the RTG scheme. The London Plan requires 448 long stay cycle parking spaces, based on 1 space per 75sqm of office floor space. The applicant is proposing policy compliant long stay cycle parking in the form of 448 spaces.
174. The long stay cycle parking would be accessed via cycle lifts located on the ground floor of the office building, at the Little Somerset Street frontage.
175. The London Plan requires 56 short stay cycle parking spaces as part of the revised scheme. The applicant is proposing 56 short stay cycle parking spaces on the public realm around the site. The scheme is therefore policy compliant in respect of short stay cycle parking.
176. 5% of the cycle parking spaces are accessible for adapted cycles and this arrangement will be secured by planning condition (in line with London Plan Policy T5 cycling B, with the London Cycling Design Standards 8.2.1, and the emerging City Plan 6.3.24).
177. To complement the cycle parking, the revised proposals includes 40 showers and 400 lockers. The locker provision is in accordance with the London Plan policy, paragraph 10.5.7, which recommends a minimum of 2 lockers per 3 long-stay spaces. The shower provision is slightly below (9 showers) London Plan policy, paragraph 10.5.7 requirement, which is

at least 1 shower per 10 long-stay spaces. This is considered to be acceptable given the basement constraints.

178. The applicant will be responsible for promoting the use of the cycle parking spaces and as such will be required by planning condition to produce a Cycling Promotion Plan, which is a cycling focused Travel Plan. It will be submitted to the City for approval in line with London Plan policy T4 and paragraph 10.4.3.

### **Car Parking**

179. Local Plan 2015 Policy DM16.5 – 1 and Draft City Plan 2036 policy VT3 – 1 require development in the City to be car-free except for designated Blue Badge spaces.
180. As per the RTG scheme the proposed development would be car free except for 11 blue badge car parking spaces, which is the overall provision for the office, residential and hotel parts of this development approved in the 2016 scheme. The 11 blue badge spaces are split between the office, residential and hotel - 4 of the blue badge spaces are to be dedicated as residential spaces. Therefore, a total of 7 blue badge spaces would be shared between the proposed office development and the consented hotel. This is as existing in the previous permission and as the design of the basement has not changed, the proposed arrangement is acceptable.

### **Servicing and Deliveries**

181. Policy DM16.5 of the Local Plan and draft City Plan 2036 Policy VT2 – 1 require developments to be designed to allow for on-site servicing. Policy VT2 – 2 requires major commercial development to provide for freight consolidation. Policy VT2 – 4 requires delivery to and servicing of new developments to take place outside peak hours (7am – 10am, 12pm – 2pm and 4pm – 7pm on weekdays) and requires justification where deliveries within peak hours are considered necessary.
182. The proposed servicing arrangements would remain as per the RTG scheme. The servicing of the building would take place off-street in the basement. The dedicated servicing space for the office development is part of a shared servicing area for the wider hotel, residential and office development that was approved under the 2016 scheme (access to the basement servicing area would be secured through the S.106 agreement). The servicing area is accessed via a ramp from Little Somerset Street. Vehicles would be able to enter and exit the servicing area in forward gear.
183. The servicing area would accommodate 2 vehicles up to 10m in size, these 2 dedicated loading bays are for the exclusive use of the office and associated retail land uses.
184. Off-site consolidation of deliveries would be used and as such the number of vehicles arriving at the site would be capped at 35 per day. This would be secured through the Section 106 agreement.

185. Waste collection for the office building would take place in the same way as all other servicing vehicles and would be included in the daily cap of 35 vehicles.
186. The Still and Star pub would also be serviced from within the basement.
187. There is an existing condition for the site in respect of the 2016 permission which states: "No servicing of any of the premises hereby permitted shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building." These servicing restrictions would remain in place due to the proximity of the site and the hotel to residential premises.
188. The development should be accompanied by a delivery and servicing plan (DSP), and this would be secured through the s.106 agreement.

### **Public Transport**

189. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B.
190. The site is located close to Aldgate, Aldgate East, Liverpool Street and Tower Hill underground stations. The site is located close to the DLR and national rail services at Liverpool Street and Fenchurch Street. The site is close to several bus routes running on Aldgate High Street.

### **Pedestrian Comfort**

191. Some pedestrian comfort analysis has been carried out to account for the uplift in floorspace which demonstrates that the areas along Aldgate High Street would achieve a PCL of A+ during the AM and PM peak periods. As per the RTG scheme it is considered that the footways around the site have sufficient capacity to accommodate pedestrian movements comfortably.
192. Footway widths around the east, west and southern sides of the development would range from 3.2 m to 4.5 m enabling generous north/south and east/west walking routes that tie in with the wider redevelopment of the area secured under the 2014 planning permission.
193. The submitted Transport Assessment indicates that the overall increase in trips across all modes would have a minimal impact on the surrounding highway and public transport network capacities.

### **Public Realm and highway implications**

194. As set out above the public realm and permeability around the site would be improved as a result of the development.
195. In this revised scheme the design concept at the end of the Little Somerset Street is still proposed to be a shared amenity space that is less dominated by vehicles. Vehicles turning into Little Somerset Street would not risk collision with the building due to the carefully placed street furniture, which would be designed by the City of London in agreement

with the applicant. This would need to be wholly funded by the developer and secured by agreement.

196. The arcade on the route from Aldgate High Street to Little Somerset Street would be at a height above 5.7m and this would be dedicated as public highway. The arcade at the front of the building, along its northern edge adjacent to Aldgate High Street and the arcade on the south eastern side of the building would have a height below 5.7 m. In the revised proposal it has been agreed by the applicant to dedicate these arcaded areas as public highway subject to further discussions with the City's transportation team.
197. The new pedestrian route may require Hostile Vehicle Measures, which would need to be sensitively designed within street furniture where possible. The final HVM design and its full funding by the developer would be agreed by planning condition and in collaboration with the City of London through a Section 278 agreement.
198. Undersailing is not usually accepted under public highway at a depth of less than 1.2m to facilitate utilities in the public highway. Due to the constraints of the site, the connection to the existing basement, and the proximity to underground rail lines, the basement is proposed at a height less than 1.2m below the public highway as per the RTG scheme. The undersail will need to go through Technical Approval with the City of London's District Surveyor, and receive sign off by the highway department, but in principle due to the constraints of the site, the undersail would be acceptable.

### **Stopping Up**

199. Due to the amended configuration of the ground floor area, the proposed stopping up arrangements would be revised when compared to the RTG scheme. It is proposed that a minimum of 472 sqm of public highway would need to be stopped up.
200. Under the RTG scheme it was considered that the existing open space fronting Aldgate High Street would need to be stopped up (total stopping up required under the RTG scheme was 636.8 sqm). This is land jointly owned by the applicant and TfL, which was considered to have become public highway as a result of long and uninterrupted use. The applicant has undertaken further investigation as to the status of this area and has had discussions with the City's transportation team. There is a possibility that the area could be permissive path. Furthermore, it is not shown as public highway on the City's mapping system.
201. Following ongoing investigation, should the area in question be deemed to be permissive path then the stopping up for the revised scheme would be 472 sqm. Should it be concluded that the area is public highway then the total stopping up for the revised scheme would be 699 sqm. This extent of stopping up would be largely comparable to the RTG and 2014 schemes. All be it the proposed scheme would dedicate more public highway and provide an increase in public realm as set out in the following paragraphs.

202. To balance the stopping up new and enhanced public routes and public realm would be provided, a minimum of 300 sqm would be dedicated as public highway. This would include the route linking Aldgate High Street to Little Somerset Street. The applicant would be agreeable to dedicating a further 184 sqm of area as public highway but this would be subject to agreement from the City's transportation team given the additional areas would not meet the City's highway requirements i.e. the height of the routes at certain points would be below 5.7 m.
203. The revised scheme would provide an uplift in public realm of 83 sqm and 203 sqm when taking into consideration proposed ground level planters when compared to the RTG scheme.
204. Numerous swept path analysis have been conducted to ensure the stopping up will not impact negatively on large vehicles that want to use the redesigned Little Somerset Street, and we are satisfied that the proposals for Little Somerset Street would enhance the environment for people walking and cycling and would not detrimentally impact the use of the street for drivers.
205. As was the case with the RTG scheme, the proposed stopping up and reconfiguration of Little Somerset Street would make turning for vehicles tighter than the existing arrangement. However successful access and manoeuvres for all vehicles has been demonstrated by swept path analysis. Further, the applicant does not expect many vehicles larger than a 7.5t box van to service the adjoining buildings using Little Somerset Street given their previous traffic counts and traffic monitoring surveys and this assessment is agreed. Given the data produced by the traffic counts and the swept path analysis the proposed changes to Little Somerset Street, including tightening of the carriageway, is not considered a concern for the scheme, and are considered a benefit of the scheme, and will be fully funded by the developer as part of a Section 278 agreement.
206. The Stopping Up would be subject to the statutory consultation process. Should the stopping up order raise objections which, the applicant cannot resolve, your committee would need to consider any outstanding objections and decide whether or not to make the Stopping Up Order.
207. The Court has authorised the Town Clerk to make stopping up orders that are not opposed, and he has delegated this authority to the Director of the Built Environment. Opposed stopping up orders are, however, reported to your Committee to determine.

### **Section 278 Agreement**

208. As per the RTG scheme the applicant has agreed to enter into a section 278 agreement which would need to be secured in the S.106 Agreement. The Section 278 agreement would include, but would not be limited to works to the footway and carriageway on Little Somerset Street, works to the footway on Aldgate High Street, the provision of a new pedestrian route between Aldgate High Street and Little Somerset Street, the dedication of the new pedestrian routes, appropriate HVM, and other works to complement the scheme. The Section 278 works

would extend south on Little Somerset Street to include improvements past the service entrance for the development.

209. There is a separate agreement with TfL to provide a new crossing on Mansell Street to improve the pedestrian crossing facilities in the area.
210. The Section 278 works would be in line with the 10 Healthy Streets indicators, the City of London Transport Strategy and City of London's Public Realm vision. This would be secured through the Section 106 agreement.

### **Construction Logistics Plan**

211. 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.

### **Transport and Highways conclusion**

212. The proposal would promote active travel through the provision of cycle parking and would deliver benefit by consolidating freight and providing public realm improvements. The proposal would accord with the relevant transportation related policies including London Plan policies T5 cycle parking, T6 car parking, T7 deliveries, servicing and construction, and D11 Safety, security, and resilience to emergency. It accords with the Local Plan 2015 Policies DM3.2 and DM16.5, and the draft City Plan 2036 Policies AT1 – 5, SA3, VT2, and VT3. As per the RTG scheme the proposed stopping up would be offset by the dedication of new areas of public highway and enhancements in the public realm.

## **Environmental Sustainability**

### **Circular Economy**

213. 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.
214. The submitted Draft Circular Economy Statement describes the strategic approach to incorporating circularity principles and actions according to the GLA Circular Economy Guidance.
215. The existing buildings on site cannot be retained for the proposed development. The area available to construct the basement levels is heavily constrained by the London Underground tunnels passing across the site to the north. The existing single storey basement occupies an area that would be needed to construct the two basement levels for the required plant. The scale and form of the existing buildings or superstructures on site would not be able to be designed into the proposed new form and scale of the development, and their demolition is required in order to remove the basement.

216. The proposed development intends to follow best practice principles in the design and construction with the overarching aims of reducing material usage, minimising waste, and embedding longevity, flexibility, adaptability and demountability. These include:
- A sustainable procurement plan to guide material selections, including those that are responsibly sourced and of low carbon impact
  - A site waste management plan with on-site waste facilities sized to accommodate predicted waste streams from the development
  - Comparative analyses of different structural design options
  - Reduction of material use, e.g. 20% savings in steel consumption through design development
  - Designing in flexibility in use.
217. Details are contained in the submitted Circular Economy Statement and their confirmation will be secured by condition in an update to be submitted after the detailed design phases. This assessment will be required to demonstrate that the relevant targets set out in the GLA Circular Economy Guidance can be and have been met.
218. A post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm that high aspirations have been achieved is also requested by condition.

### **Operational Energy use and CO2 emissions**

219. The Energy Statement accompanying the planning application demonstrates that the development has been designed to achieve an overall 39.1% reduction in regulated carbon emissions compared with a Building Regulations compliant building, based on SAP 10 carbon factors as required by the GLA. The strategy includes both the office floorspace and the new public house.
220. The proposed energy demand reduction strategy would reduce the building's operational carbon emissions by 8.4% compared to a Building Regulations compliant building.
221. Overheating is addressed by incorporating high levels of insulation, supported by mechanical ventilation and cooling systems operated by Air Source Heat Pumps and fan coil units. Ventilation heat recovery would further reduce energy demand. Optimised glazing to solid ratios, shading fins and urban greening would reduce solar gain and heat loss.
222. There is currently no available district heating network close enough to the site. The opportunity to connect to this or another future district heating network has been incorporated into the proposed development and would be secured by condition.
223. Renewable energy technologies are proposed in form of Air Source Heat Pumps for space heating. In addition, a Photovoltaic Panel array with an area of 387 sqm would be installed on the roof. These technologies

would contribute carbon emissions savings of 30.7% compared to a Building Regulations compliant building.

224. Carbon emission savings from unregulated energy uses (e.g. from appliances/cooking) that are not considered under the Building Regulations would be encouraged through measures such as energy efficient appliances and equipment, controls, high efficiency vertical transportation, promoting the use of stairs and good management practice.
225. The site-wide energy strategy would comply with the minimum London Plan carbon emission reduction target for major new development.

### **BREEAM**

226. A BREEAM New Construction 2018 pre-assessment has been prepared. The proposed development targets an “excellent” rating. This is an improvement on the RTG scheme which would have achieved a “very good” rating under the 2018 BREEAM assessment.
227. The assumptions made as part of the pre-assessment indicate that the proposals can meet all the mandatory level requirements for the targeted rating including a score of  $\geq 70\%$ . The pre-assessment indicates a score of 75.1% and aims to achieve a high number of credits in the CoL’s priority categories of Energy, Water, Pollution and Materials. In particular, further credits can typically be achieved in the Materials category.
228. 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.

### **Whole Life-Cycle carbon emissions**

229. 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 as is the case in this instance given that the scheme is non referable) 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.
230. The submitted Whole Life-Cycle carbon strategy focusses on reducing material consumption in the planned sub and superstructure through a

hung steel structure and the use of cement replacements and recycled content in the façade materials. The applicants will consider further opportunities to reduce carbon emissions during the ongoing design development by maximising, recycled content, and in the product specification. A further detailed Whole Life Cycle Carbon assessment is required by condition prior to commencement of any works.

231. The estimated Whole Life-Cycle carbon emissions are shown in the table below in context of current industry benchmarks.

232. Embodied carbon emissions relating to the life-cycle modules of development (ref. GLA’s draft Whole Life-Cycle Carbon Assessments Guidance, page 9):

Scope	Proposed Redevelopment	Benchmark	Benchmark Source
RICS Components	kgCO2/m2	kgCO2/m2	
A1-A5	784	1000	GLA Standard
		600	GLA Aspirational
		600	LETI 2020 Design
		350	LETI 2030 Design
A–C (excluding B6-B7)	1158	1500	GLA Standard
		1400	RIBA Business as Usual
		1180	RIBA 2021 Good
		970	RIBA 2025
		900	GLA Aspirational
		750	RIBA 2030

A-C (including B6- B7)	1884		
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233. Over the proposed building's whole life-cycle, the embodied carbon emissions calculations at planning stage show that the development could achieve a level between the GLA's Standard and Aspirational Benchmark. In addition, the future grid decarbonisation would reduce the operational carbon emissions from 66% to 39% as a proportion of the Whole Life-Cycle carbon. It is anticipated that during the detailed design stage further improvements can be achieved, and 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**

234. 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.

235. The proposed ecology and urban greening strategy is aimed at not only providing wildlife habitats but also enhancing surface water management, health and wellbeing, and reducing urban heat island effects. The proposed building would introduce green roofs, green walls (through climbers), landscaped terraces and ground level planting as well as overall approx. 60 new trees.

236. Details of the quality and maintenance of the proposed urban greening are required by condition.

237. The Urban Greening Factor (UGF) for this application has been calculated at 0.36 (CoL methodology) based on the information provided, which exceeds the City's draft Local Plan UGF target of 0.3 for commercial development and is a marginal improvement on the RTG's UGF (0.35).

238. Biodiversity features are proposed including ten bird boxes, two insect hotels and four ecological features (drilled logs, rocks and log piles) on the biodiverse roof. Biodiversity area based habitats include green walls, green roof and planters at ground level. Further details of the measures would be required by condition.

239. The proposed greening and biodiversity measures are considered to accord with policies DM19.2, DM10.2 and DM10.3 of the Local Plan.

### **Climate Change Resilience**

#### **Water resources**

240. The internal water consumption of the proposed development will be significantly reduced through the use of water efficient fixtures and fittings as well as a leak detection system.

241. Rainwater harvesting systems will be incorporated into the scheme to serve the irrigation systems and non-potable supplies to the Landlords WC's. Due to spatial constraints within the basement footprint, the rainwater harvesting systems will be provided with a backup potable domestic water supply to ensure continuous operation of the irrigation and non-potable systems during dry periods.

#### Flooding

242. To reduce surface water run-off, the development would incorporate a combination of intensive and extensive green roofs on the terraces. The rainwater harvesting system would contribute to reducing rainwater run-off.

243. A Thames Water combined sewer located close to the site would provide unrestricted discharge of surface water.

#### Heat Stress

244. The sustainability and energy statement outlines measures to prevent overheating by including natural ventilation openings combined with mechanical ventilation, optimised glazing to solid ratio, façade integrated solar shading fins and exoskeleton and urban greening to cool the facades. These measures will reduce the need for carbon intensive air conditioning and will help to make the building resilient to higher temperatures and urban heat island effects.

#### Natural Capital and Pest & Diseases

245. The proposed development will incorporate green infrastructure and enhance biodiversity by creating opportunities for a variation of landscaping, planting types and habitats, as well as green roofs and terraces. The soil types and plant species would be selected to avoid pest and diseases. 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.

246. Overall, this development includes a range of measures which will improve its resilience to climate change. Details of these measures will determine how effectively the building performs in coming decades, and conditions are attached to seek more detailed modelling and planting plans against the UK Climate Projections UKCP18 to 2080.

#### **Sustainability Conclusion**

247. 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.

248. The proposed development, by way of its central location within London, its opportunities for providing a positive and healthy work/life environment, and its environmental credentials, would positively contribute to the economic, social and environmental sustainability of the City of London. The proposed sustainability strategy overall meets current London Plan policies as well as Local Plan policies, and it targets an “excellent” BREEAM assessment rating.
249. The proposals indicate that Whole Life-Cycle Carbon emissions can be significantly reduced, improving on the GLA’s standard benchmark. Circular Economy principles can be positively applied to achieve a 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 low energy technologies would be employed to reduce operational carbon emissions in line with London Plan requirements.

### **Air Quality**

250. 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 SI of the London Plan.
251. The submitted air quality assessment shows that the transport and building-related emissions associated with the proposed development are below the relevant benchmarks. As such, the proposed development would comply with the requirement that all new developments in London should be at least air quality neutral.
252. The construction works would have the potential to create dust and it may be necessary to implement mitigation measures. A condition is recommended that requires the submission of a Scheme of Protective works to be submitted prior to the commencement of development.

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

253. 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. Policy CS10 of the Local Plan seeks to ensure that buildings are designed to be appropriate to the amenities of surrounding buildings.

## **Daylight and Sunlight**

### **Assessment Context**

254. Officers consider that the applicant has completed a comprehensive daylight and sunlight assessment of the potential impact of the revised scheme to surrounding residential buildings and open spaces having regard to the recommendations in BRE Report 209, Site Layout Planning for Daylight and Sunlight: A guide to good practice (second edition, 2011).
255. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing, and maximising the usability of outdoor amenity space.
256. Regarding the Local Plan, policy DM10.7 seeks to resist development that 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 (BRE) guidelines. The BRE guidance acknowledges that ideal daylight and sunlight conditions may not be practicable in densely developed city-centre locations. Policy DM12.3 of the Local Plan states that proposals should seek to protect daylighting and sun lighting levels to adjacent residential accommodation.
257. Paragraph 3.10.41 of the Local Plan and Policy HS3 of the Draft City Plan 2036 state that when considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals.
258. The BRE guidelines set out the following methodologies for assessing the impact of development on the daylight to existing dwellings:

Daylight to windows: Vertical Sky Component (VSC): a measure of the amount of sky visible from a centre point of a window. The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.

Daylight Distribution: No Sky Line (NSL): The distribution of daylight within a room is measured by the no sky line, which separates the areas of the

room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

259. The BRE Guide recommends compliance with both the VSC and NSL guidelines.
260. In the BRE guidelines, sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE guidance explains that sunlight availability may be adversely affected if the centre of the window:
- Receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and
  - Receives less than 0.8 times its former sunlight hours (as result of a proposed development) during either period; and
  - Has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.
261. To clarify, all three of the above criteria need to be met for there to be a noticeable reduction in the sunlight that can be received (at the centre of the window that has been assessed).
262. The BRE guidelines advises that if the available sunlight hours are both less than 25% ASPH annually and 5% APSH in winter and less than 0.8 times their former value, either over the whole year or just in the winter months (21 September to 21 March) then the occupants of the existing building would notice the loss of sunlight; if the overall/absolute annual loss of sunlight is greater than 4% of APSH, the room may appear colder and less pleasant.

### **Assessment Approach**

263. The applicant has provided the following three assessment scenarios in conjunction with the revised scheme:
- The proposed scenario – existing site conditions vs. the proposed scheme;
  - The comparison scenario – the RTG scheme vs. the revised scheme;
  - The cumulative scenario – existing site condition vs the revised scheme and the development that is currently pending consideration at 55 – 56 Aldgate High Street (app ref. 21/00313/FULMAJ).

264. In undertaking assessments a judgement is made as to the level of impact on affected windows and rooms. Where there is a less than 20% change (in VSC, NSL or APSH) the effect is judged to not be noticeable. Between 20 – 30% it is judged to be minor adverse, 30 – 40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. The judgements that arise from these percentages are drawn from approaches to environmental impact assessment and have become part of an industry standard utilised by Daylight and Sunlight specialists (all be it this application is not an environmental impact assessment case). It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which is or is not acceptable.
265. It should be noted that where there are existing low levels of daylight in the baseline figures any change in measured levels can be described in two ways to give a more complete picture. These are:
- Percentage change (e.g. 10% reduced to 8% = 20% reduction); and
  - Actual/Absolute change (10% reduced to 8% = 2% change)

### **Properties and Areas Assessed**

266. The following properties and amenity areas have been included within the assessment:
- 1 – 143 Guinness Court (residential)
  - Iveagh Court (residential)
  - 47 Aldgate High Street (residential)
  - 73 – 75 Aldgate High Street (residential)
  - 55-56 Aldgate High Street/3 Little Somerset Street (existing scenario and scenario currently proposed under application ref. 21/00313/FULMAJ - Demolition of existing building at 55-56 Aldgate High Street and erection of replacement ground plus 13-storey mixed-use building comprising; 287 sqm (GIA) of office floorspace (Use Class E) at basement, ground and first floor levels; 41no. residential units (Class C3); office terrace at first floor level; residential balconies, landscaping and cycle parking, and associated works.)
  - 53 – 54 Aldgate High Street (residential)
  - 48 – 49 Aldgate High Street (residential)
  - 140 Minories (residential)
  - Amenity space adjacent to Guinness Court (existing scenario)
  - Amenity space to be delivered as part of application ref. adjacent to the hotel development, residential development and Guinness Court

- Aldgate Square
  - Gardens of St Botolph Without Aldgate
267. The applicant is aware that 150 Minories contains residential units, however they do not face the development site and therefore have not been included in the analysis.
268. The following properties adhere to the numerical values set out within the BRE Guidelines. It is considered that there would therefore be no noticeable reductions in daylight and sunlight to them and they are not discussed further:
- 140 Minories
  - Iveagh Court
  - 53 – 54 Aldgate High Street (with the exception of the cumulative scenario)
  - 48 – 49 Aldgate High Street

## **Daylight and Sunlight Assessment to Residential Properties**

### **1 – 43 Guinness Court**

269. 1 – 43 Guinness Court are residential properties to the southeast of the site.

### **VSC Analysis**

270. The VSC analysis for existing site conditions versus the revised development, show that of the 293 tested windows 279 (95%) would be BRE compliant.
271. 14 windows show transgressions from the BRE Guidelines. The transgressions can be categorised as follows: 10 between 20 – 30% (minor adverse), 1 between 30 – 40% (moderate adverse) and 3 over 40% (major adverse).
272. Of the minor adverse impacts six windows would maintain VSCs in the mid teens (13.2% to 17.5% serving 3 bedrooms, 2 living rooms, 1 kitchen). The applicant has cited examples of developments in London including the Whitechapel Estate appeal and Monmouth House where VSCs in the mid teens have been ruled as acceptable for inner city high density environments recognising that the 27% BRE daylight target is derived from a low density suburban housing model.
273. Of the remaining windows that transgress (excluding the six minor adverse transgressions referred to in the paragraph above), all demonstrate very low existing levels of light (3% or below, serving living rooms) therefore any slight changes to light levels would give high percentage losses. The absolute VSC reductions for the three major adverse impacts would be between 1.1% and 1.8%, for the moderate adverse impact it would be 0.8% and for the remaining four minor adverse impacts it would be between 0.3% and 0.6%. These actual

percentages changes are so low that they would be unlikely to result in perceptible changes to daylight.

274. Furthermore, ten of the 14 windows that experience transgressions (two of the major adverse, one moderate adverse and seven minor adverse) would serve rooms with a BRE compliant NSL.
275. When comparing the VSC results for the RTG scheme and the revised scheme, they have the same impact on the windows that transgress with very low existing light levels (i.e. the three major adverse impacts, one moderate adverse impact and the four minor adverse impacts). The revised scheme has slightly higher daylight losses (absolute changes between 0.4% and 0.6%) than the RTG scheme on six of the windows that experience minor adverse transgressions, all be it not to a material degree. Furthermore, these are the windows that would maintain VSCs around the mid-teens even as a result of the revised proposal as set out above.

### **NSL Analysis**

276. When considering the NSL analysis, 252 out of the 256 tested rooms show compliance to the suggested values within the BRE Guidelines. Of the four rooms that show transgressions, two show transgressions between 20 – 30% (minor adverse, two bedrooms) and two show transgressions between 30 – 40% (moderate adverse, one living room and one bedroom). Three out of the four rooms that would experience transgressions are bedrooms, which the BRE guidance considers as being less important than kitchens, living rooms and dining rooms. The affected living room would experience an actual percentage reduction in daylight of 4.5% and a percentage loss of 31%. Notwithstanding, even as a result of the development the living room would retain an NSL of over 50% therefore the majority of the room would still have a view of the sky.
277. When comparing the NSL results for the RTG and revised scheme, the impact on the NSL result for the affected living room would be the same under the RTG and revised scheme. The transgressions to the three affected bedrooms would be marginally increased under the revised scheme when compared to the RTG scheme but the change is not considered such that it would be material (actual percentage changes of 0.1% to 0.3%). However, as set out above bedrooms are considered less important under the BRE guidance.

### **Sunlight Impact**

278. When assessed against the Annual Sunlight Probable Hours (APSH), all the windows relevant for assessment would show full compliance with the BRE guidelines. The same applies for the RTG scenario.

### **Existing vs Cumulative Scenario**

279. Where the additional pending proposals at 55-56 Aldgate High Street are introduced alongside the proposals, there would be no additional windows or rooms that would transgress the BRE Guidelines in VSC and NSL for daylight and APSH for sunlight.

### **47 Aldgate High Street**

280. 47 Aldgate High Street is the Hoop and Grapes pub to the east of the application site. The applicant has assessed 47 Aldgate High Street for the avoidance of doubt as it is thought it could contain ancillary residential accommodation on its upper levels, all be it the City's mapping system does not show the property as having a residential element. The applicant's analysis does not distinguish between habitable and non-habitable rooms as the applicant was unable to obtain detailed floor plans.

### **VSC Analysis**

281. Seven of the 12 assessed windows would be BRE compliant. Of the five transgressions two show transgressions between 20 – 30% (minor adverse) and three show transgressions of over 40% (major adverse). The actual percentage changes to these windows ranges from 3.1% to 9.9%, with three of the windows maintaining a VSC in the region of 10 % to 14.7%. These VSC results are considered to be acceptable given the inner City location of the development and that there is not thought to be permanent residential accommodation on the site.

282. When comparing the RTG and revised scheme, the revised scheme would result in marginally higher daylight losses to 47 Aldgate High Street, all be it the difference between the two schemes is not considered to be material (actual change ranging from 0.4% to 1.2%).

### **NSL Analysis**

283. Of the nine rooms that were tested, four would be BRE compliant. Four rooms would experience transgressions in the region of 20 – 30% (minor adverse) and one room would experience a transgression greater than 40% (major adverse). One of the rooms that would experience a minor adverse impact would maintain a window that would be VSC compliant in BRE terms and one of the rooms that would experience a major adverse impact would maintain a window with a VSC in the mid teens, which is considered to be reasonable for an inner city location. The resultant NSLs would range from 48.5% to 60.9% which are also considered to be reasonable for a high density urban location.

284. When comparing the RTG and revised scheme, the NSL results are either the same (upper levels of the building) or similar with an actual change of 0.1 % - 0.2%. The difference between the two schemes is not material.

### **Sunlight Impact**

285. Three out of the eleven relevant tested windows would comply with the BRE criteria. Of the windows that show transgressions seven show transgressions over 40% annually, one shows a transgression between 30 – 40% in winter and five show transgressions over 40% in winter.

286. The retained level of sunlight for three out of the eight impacted windows that see transgressions is at or just below the suggested values noted

within the BRE Guide for example, one of the windows at second floor level would experience transgressions of 40% annually and in winter but would retain 24% APSH and 6% WPSH which is just short of the BRE suggested value for APSH and over the suggested value for WPSH.

287. The remaining sunlight transgressions are considered acceptable given the site is not in permanent residential use.
288. The RTG scheme would be broadly comparable in APSH terms. There are two windows that would experience an absolute change of 3% from the RTG scheme but in both instances the two windows would remain BRE compliant and remain above the minimum 25%.

### **Existing vs. Cumulative Scenario**

289. In consideration of the pending proposal at 55-56 Aldgate High Street alongside the application scheme, one additional room would transgress the BRE guidelines in NSL only. Notwithstanding, the impacted room would still maintain an NSL of 61% which is considered reasonable for a high density urban area.

### **73 – 75 Aldgate High Street**

290. 73 – 75 Aldgate High Street is to the west of the site. The layouts of this property have been assumed due to a lack of available floor plans. The applicant has advised that this property is owned by TfL, the upper parts comprise five House in Multiple Occupation units that are currently vacant. The units are vacant as they do not comply with HMO regulations and as such TfL are exploring sale or refurbishment. By way of further background, a Certificate of Lawful Development application is currently under consideration for the use of the upper floors of this building as an office (ref. 22/00117/CLOPD).
291. This property would not be affected by the cumulative scenario as the impact of the proposed scheme at 55 – 56 Aldgate High Street would be blocked by the massing of the proposed office development.

### **VSC analysis**

292. Of the 34 windows that were assessed, all would experience transgressions as a result of the proposed development. 24 would show transgressions between 20 – 30 % (minor adverse), seven would show transgressions between 30 – 40% (moderate adverse) and three would show transgressions of over 40% (major adverse). Notwithstanding, 31 of the windows would retain a VSC in the range of 15% - 21.9% which is considered reasonable for a high-density urban area. The resultant three windows would experience VSCs in the range of 7.1% to 13.1% and would serve NSL compliant rooms.
293. When comparing the RTG and revised scheme the difference in VSC impact between the two schemes is not considered to be material with absolute changes in VSC ranging from 0.5% to 0.7% between the two schemes.

### **NSL analysis**

294. Of the 19 rooms that were assessed, 18 would comply with the BRE guidance. The single room that shows a transgression would experience a transgression between 30 – 40% (moderate adverse). This room would still retain an NSL of over 50% and a VSC of 15% which is considered reasonable for an urban area.
295. When comparing the RTG and revised scheme the difference in NSL impact between the two schemes is not considered to be material with the absolute change in the above NSL result being 0.8 % greater in the revised scheme.

### **Sunlight Impact**

296. All of the relevant tested windows show full compliance with the BRE guidelines.
297. The impacts of the RTG scheme are not materially different to the revised scheme in terms of sunlight available to relevant rooms in 73-75 Aldgate High Street.

### **Existing vs. Cumulative Scenario**

298. In this scenario no additional windows or rooms would transgress the BRE guidance in VSC and NSL for daylight and APSH for sunlight.

### **55-56 Aldgate High Street/3 Little Somerset Street – Existing Scenario**

299. 55 – 56 Aldgate High Street is immediately adjacent to the east side of the application site. The analysis does not distinguish between habitable and non-habitable rooms as the applicant was unable to obtain detailed layouts.

### **VSC Analysis**

300. Of the 30 windows that were tested 15 would be BRE compliant. Of the 15 windows that show transgressions – seven would be between 20% - 30% (minor adverse) and eight would be between 30 % - 40% (moderate adverse). The resultant VSC for all of the affected rooms would be in the mid-teens or above (17% - 23.3%) which is considered to be reasonable for a high density urban area.

### **NSL Analysis**

301. All ten rooms would be BRE compliant.

### **Sunlight Impact**

302. Of the 19 windows considered for APSH, 17 would meet the BRE guidance for APSH. The two windows only transgress due to not seeing the minimum 5% Winter Probable Sunlight Hours (WPSH). The impacted windows would see 4% WPSH and reasonable levels of APSH (32% and 33%) for an urban area.
303. The impacts of the revised proposal on sunlight to 55-56 Aldgate High Street are comparable to the RTG scheme.

### **55-56 Aldgate High Street – Proposed Scenario (as currently under consideration as part of application 21/00312/FULMAJ)**

304. The impact of the proposal has been assessed on the proposed residential development at the adjoining site to the east.

#### **VSC Analysis**

305. Of the 87 windows that were tested, 67 would be BRE compliant. Of the 20 windows that show transgressions – three would be between 20% - 30% (minor adverse), 12 would be between 30%-40% (moderate adverse) and five would be over 40% (major adverse).

#### **NSL Analysis**

306. Notwithstanding, the VSC transgressions all rooms in the new development at 55-56 Aldgate High Street would be NSL compliant with the proposed office development in situ.

#### **Sunlight Impact**

307. Of the 30 windows considered for Annual Probably Sunlight Hours (APSH), 15 would meet the BRE guidance for APSH.

### **53 – 54 Aldgate High Street Cumulative Scenario**

308. In the existing vs revised scheme scenario, the residential accommodation in this building complies with the BRE Guidelines. However, in the cumulative scenario, taking account potential development at 55 – 56 Aldgate High Street, 2 out of the 6 originally compliant windows would transgress VSC and experience minor adverse effects of between 20 – 30%. This is as a result of the introduction of the cumulative scheme at 55 – 56 Aldgate high Street as opposed to the impact of the proposed scheme.

### **Daylight and Sunlight Conclusion**

309. The proposed development would result in some daylight and sunlight transgressions to neighbouring residential occupiers and to the rooms to the proposed development at 55-56 Aldgate High Street. Taking into account BRE Guidance, the nature of the results (including some low existing values), the site's location within a dense urban environment and the types of residential accommodation (i.e. 47 Aldgate High Street does not contain permanent residential accommodation, it has been tested as there is a possibility it could contain ancillary accommodation), it is not considered that the proposal would result in an unacceptable impact on the existing properties and would not reduce the daylight and sunlight to nearby dwellings to unacceptable levels such that it would warrant a refusal of planning permission. As such, the impact on daylight and sunlight as a result of the proposed development is considered to be in accordance with development plan policies. In designing the development the applicant has sought to protect the daylight and sunlight levels to adjacent residential properties and this is considered to have been achieved as far as possible.

## **Radiance Assessment**

310. A Radiance Assessment has been submitted by the applicant to supplement the daylight analysis contained in the submitted daylight and sunlight assessment for the development.
311. 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.
312. Whilst there is currently no established guidance regarding what constitutes a 'noticeable' or 'significant' change in daylight when using the Radiance methodology, radiance-based assessments can draw upon the BRE's recommended Average Daylight Factor (ADF) target values, which 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 BRE guidelines recommend the following minimum ADF values for residential properties: 1% for bedrooms, 1.5% for living rooms and 2% for kitchens.
313. Radiance assessment results are presented as either floor plans / 3D room diagrams colour rendered to illustrate the individual daylight factors within a room, which range between 0% and 5%. The colour rendering can be supplemented by grey-scale images which represent a Human Visual Response (HVR) that correlates with a person's subjective impression of light within a room. In addition, the average value of the individual daylight factors within a room can be expressed as an ADF percentage for the room as a whole.
314. It should be noted that the Radiance Assessment undertaken is not meant to replace the submitted daylight and sunlight assessment, but to provide a further way to illustrate daylight changes within habitable rooms in the neighbouring residential properties.
315. The submitted radiance analysis examines all tested rooms for existing vs revised scheme vs RTG scheme scenarios. The images demonstrate that there would be a reduction in daylight to some properties when considering the existing versus revised scheme scenario, which corroborates with the daylight assessment. The images demonstrate that the impacts of the RTG scheme and revised scheme are comparable.
316. It is however, considered unlikely that the changes illustrated by the radiance assessment would lead to any different use of the habitable rooms tested, or any meaningful increase in the use of supplementary artificial lighting.

## **Overshadowing**

317. The BRE guidelines suggest that the availability of sunlight should be checked for open spaces including 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 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.
318. The potential overshadowing impacts of the proposed development have been assessed for open spaces in the vicinity including the proposed landscaped area to the south of the site, Aldgate Square and Gardens of St. Botolph Without Aldgate.
319. The results show that the development would be fully BRE compliant in this respect and would not cause significant alteration to levels of overshadowing experienced by the neighbouring amenity areas assessed. The proposal would accord with policies D6(d) of the London Plan and policy DM10.7 of the Local Plan which seek to ensure that development does not reduce sunlight to nearby open spaces to unacceptable levels.

## **Wind Microclimate**

320. Policies DM10.1 of the Local Plan 2015, policy S8 of the draft City Plan 2036 and policy D8 of the London Plan seek to optimise wind conditions in and around development sites. The design of developments should avoid unacceptable wind impacts.
321. Wind tunnel testing has taken place to predict the local wind environment associated with the revised proposal and the resulting pedestrian comfort within and immediately surrounding the site. CFD simulation 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. It should be noted that only CFD analysis was carried out in conjunction with the RTG scheme.
322. 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.
323. A separate safety criterion is also applied to ascertain if there would be any safety risks to pedestrians or cyclists.
324. If resulting conditions are identified as being unsafe or unsuitable in terms of the intended use, then mitigation is required. 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.

325. Assessments have been carried out for both the Windiest Season and the Summer Season.
326. There are some differences between the CFD and wind tunnel analysis. In all tested scenarios the CFD analysis identifies most areas around the site as being suitable for frequent or occasional sitting where as in the wind model test scenarios the majority of areas around the site are identified as being suitable for standing or occasional sitting. 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. The analysis below focuses on the wind tunnel results as the worst case scenario.
327. The following configurations have been assessed:
- Existing site with existing surrounding buildings
  - Proposed scheme with existing surrounding buildings
  - Proposed scheme with consented cumulative schemes
  - Proposed scheme with existing surrounding buildings and wind mitigation
  - Proposed scheme with cumulative surrounds and wind mitigation

### **Existing Baseline Conditions**

328. In winter conditions are suitable for standing or occasional sitting, except for the area at the junction between Aldgate High Street and Middlesex Street where wind conditions are only suitable for walking. During the summer months wind conditions across the site and wider surrounds are generally suitable for occasional sitting.
329. The only locations which are too windy for their use were receptors in an outdoor seating area in Aldgate Square and an outdoor seating area immediately to the south of 2 Lemn Street (both suitable for standing).

### **Proposed Scheme with Existing Surrounds**

330. There would be no exceedances of the pedestrian safety criteria.
331. Wind conditions around the site would become windier than the baseline as a result of the revised development, especially on the northern pavement of Aldgate High Street between Aldgate Square and Middlesex Street. In the winter and summer scenarios this area would include areas suitable for occasional sitting, standing and walking.
332. Areas would be suitable for their intended use with exception of one bus stop on Aldgate High Street which would become too windy for its intended use. Within the site the northwest corner would be the windiest spot (suitable for walking in winter and largely standing in summer). As such the proposed pass door and one of the entrances to the retail units at the southern end of the development would be too windy for their intended use (categorised in the winter scenario as suitable for walking). An outdoor seating area would potentially be located on the south west corner of the development, this would be too

windy (standing) for its intended use during the summer and winter months.

333. At terrace level conditions would range from standing to occasional sitting.

#### **Proposed scheme with cumulative surrounds**

334. There would be no exceedances of the pedestrian safety criteria.
335. Wind conditions would be comparable to the scenario with the proposed scheme and existing surrounds, with the exception of wind conditions along the northern part of Minories which would be a fraction calmer during the summer months.

#### **Proposed scheme with existing surroundings and wind mitigation**

336. Landscaping measures and potential wind mitigation were modelled. These measures would address the exceedance of comfort criteria to the bus stop on Aldgate High Street. Wind conditions at the outdoor seating area within the site would now meet occasional sitting criteria during the summer months.
337. The issue with the pass door and retail entrance would remain in this scenario.
338. At terrace level conditions would remain suitable for standing to occasional sitting.

#### **Proposed scheme with cumulative surrounds and wind mitigation**

339. This scenario would be comparable to the proposed scenario with wind mitigation as set out above. This is with the exception of the wind conditions along the northern part of Minories which would be a fraction calmer during the summer months.

#### **Wind Microclimate Conclusion**

340. Wind conditions within and in the vicinity of the revised proposal would be safe. With the introduction of landscaping measures the development would not have a major adverse impact on the surrounding area. Details of landscaping and wind mitigation measures would be secured by condition along with the requirement for the pass door and retail entrance to be relocated. Subject to these conditions it is not considered that the proposal would have a detrimental impact on the amenities of surrounding buildings in accordance with policy CS10 of the Local Plan.

#### **Thermal Comfort**

341. 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

microclimatic 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.

342. In accordance with the City of London Thermal Comfort Guidelines an outdoor thermal comfort assessment has been prepared. The technique involves merging wind, sunlight, temperature and humidity microclimate data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.
343. The Universal Thermal Climate Index (UTCI) metric will be utilized for predicting thermal comfort. The usage categories for thermal comfort are set out below and is used to define the categorization of a given location.

<b>Usage Category</b>	<b>% of hours with Acceptable UTCI</b>	<b>Description</b>
All Season	≥90% in each season	Appropriate for use all year round (e.g., parks)
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g., outdoor dining)
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 periods (e.g., pavements, cycle paths).

344. The following scenarios were tested: baseline, proposed and cumulative.
345. In all three scenarios the majority of area around the site is determined to be either all season or seasonal. All season is appropriate for year round use and seasonal is deemed appropriate for use during most of the year.
346. The report identifies that there are outdoor seating areas to the north of the site, at the junction of Middlesex Street and St Botolph Street and to the east of the site, along Braham Street. In all three scenarios these areas do not meet the desired comfort category of all season and instead are classified as seasonal which means that they may not be suitable for outdoor seating in winter.
347. Comparing the proposed against the baseline scenario there is a variation to the north of the site along Aldgate High Street and to the south west of the site. In these areas the category changes from all season in the baseline to seasonal in the proposed scenario. The areas would remain suitable for their intended use despite this change in category. There is little difference in the results between the proposed and baseline scenarios.
348. With regard to the terraces on the upper levels of the revised proposal conditions would range from all season to short term use. It is still considered that terraces even if suitable for short term use would provide valuable outdoor space for office occupiers.
349. In conclusion it is considered that the thermal impacts of the proposal are acceptable and would not have a detrimental impact on conditions around the site in accordance with London Plan Policies D8 and D9 and Draft City Plan 2036 Policy S8.

### **Solar Glare**

350. The BRE Guidelines recommend that solar glare analysis be carried out to assess the impact of glazed facades on road users in the vicinity. Policy DM10.1 of the Local Plan and policies S8 and DE8 of the draft City Plan seek to ensure that developments address and do not have any intrusive solar glare impacts on the surrounding townscape and public realm.
351. The applicant has submitted a solar glare assessment which takes into consideration the impact of the revised development on drivers travelling eastbound and westbound along Aldgate High Street and drivers travelling southbound along Middlesex Street.
352. The assessment concludes that while the building may give off some reflections they would not be significant or detrimental to road users. This conclusion is agreed. In the light of the information provided it is not considered that the development would result in any undue solar glare issues and would therefore accord with policy DM10.1 of the Local Plan and policies S8 and DE8 of the draft City Plan.

## **Light Pollution**

353. 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.
354. New lighting is proposed in internal and external parts of the development. A condition is recommended requiring a lighting strategy for internal, external and semi external lighting, which would include details of levels and how the lighting has been designed together with management measures to reduce glare and light trespass.
355. Subject to the recommended condition, the proposed development would comply with the Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9.

## **Environmental Impacts Conclusion**

356. Subject to conditions requiring further details of wind mitigation, it is considered that the revised proposal would accord with policy DM10.7 of the Local Plan and policies S8 and DE2 of the emerging City Plan in that solar glare, daylight and sunlight, wind conditions and thermal comfort have been addressed in the design of the scheme.

## **Noise and Vibration**

357. 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. Policy CS10 of the Local Plan requires buildings that are appropriate to the amenities of surrounding buildings.
358. A noise report addendum has been submitted in conjunction with the revised proposal in order to assess the revisions to the scheme in terms of impact of noise and vibration from the mechanical plant on the surrounding area.
359. The proposed development includes 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.
360. 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.
361. All deliveries would take place within a dedicated servicing/loading bay within the building during controlled hours, and would therefore have a negligible impact in terms of noise associated with unloading.
362. In order to minimise any disturbance from the amenity terraces, conditions are recommended restricting the hours of use of the terraces and the playing of music.

363. Subject to the recommended noise related conditions it is considered that the proposal would accord with London Plan policies D13 and D14 and Local Plan policy DM15.7 and CS10.

### **Fire Safety**

364. Policy D12 of the London Plan and policy S2 of the draft City Plan seek to ensure that major developments are accompanied by a Fire Statement setting out how the development would address fire safety in the design, construction and operation of the building.

365. In accordance with this policy requirement, the revised scheme is accompanied by a fire statement which details the construction methods and materials that would be used, escape strategy, active and passive fire safety measures and access and facilities for the fire and rescue service. The details are satisfactory for this stage of the design process and demonstrate that fire safety has been embedded into the development from an early stage.

### **Health Impact Assessment**

366. Policy HL9 of the Proposed Submission City Plan 2036 advises applicants of major developments to assess the potential impacts their development may have on the health and well-being of the City's communities. The applicants have submitted a HIA in conjunction with the revised scheme which has been based on the NHS Healthy Urban Development Unit criteria, with adaptations to take into account the particular circumstances of the City. Policy GG3 of the London Plan, and TfL's Healthy Streets Indicators are also relevant. The Assessment concludes that the development would contribute towards positive health outcomes.

367. Positive impacts include:

- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to employment through the operational and construction phases of development;
- Provision outdoor amenity spaces for office users;
- Provision of a high-quality public realm areas;
- A car free development (with the exception of blue badge parking) with an excellent PTAL rating;
- Increased greening.

368. Potential impacts (noise, pollution including dust during construction) identified would need to be mitigated during the construction and operational phases, for example through:

- Implementation of a travel plan to maximise uptake of active travel options;
- 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;
- An Air Quality and Management Plan to minimise the impact of dust and particulates during the construction phase; and

369. Any potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and S106 obligations.

### **Equality Impact**

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

370. In consideration of the proposed development, the Public Sector Equality Duty (PSED) requires the City of London to consider how the determination of the application would 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.

371. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment, 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.

372. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, sex, and sexual orientation. 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.

373. This application has been assessed against the Equality Act 2010 and any equality impacts identified. The assessment has taken into consideration the Equality Statement produced by the applicants. The assessment identifies that the revised proposal could affect vulnerable groups through the construction process by temporary closures, diversions and changes to existing roads and footways and through the noise and environmental impacts of construction.

374. It would need to be ensured that the construction process is controlled through demolition and construction logistics plans and environmental management plans which would be secured by condition.

375. The applicants Equality Impact Screening also identifies that people may use the open space and informal seating adjacent to Aldgate High Street

which would be largely stopped up as part of the development. The loss of this area would be offset by the new public realm enhancements.

376. Subject to conditions, it is not considered that the proposal would result in disadvantages or have a material impact on any persons who share a relevant protected characteristic as identified in the Equalities Act 2010.

### **Update on objection from 55/56 Aldgate High Street**

377. An objection was received to the RTG scheme from the owner of the adjoining site, 55/56 Aldgate High Street. The following concerns were raised:

- the fenestration in the wall of the RSG scheme adjacent to the boundary would result in overlooking of the objection site and numbers 54 Aldgate High Street and 50 – 53 Aldgate High Street; and
- that at fifth floor level the development footprint of the RSG scheme would be set off the boundary by 1 metre and should the objection site be developed this could create a narrow wind tunnel between the two sites.

378. The objector considered that these matters could impede future development potential of the objection site.
379. The applicant has engaged with the adjoining owner and the revised scheme addresses the concerns that were raised. The massing revisions close the gap between the proposed office building and the adjoining site boundary and fire rated opaque glazing is now proposed in the northeast section of party wall to address concerns about overlooking. A conditional letter of support has been submitted in conjunction with the revised proposal. The adjoining owners request that conditions and S.106 clauses are secured relating to the design, maintenance, cleaning and restriction of the insertion of clear glazing into the flank façade of the new office building. Furthermore, they request that the demolition and construction works are discussed with them prior to commencement and should not impede access to the adjoining site. The requested details would be secured by condition (3 (scheme of works demolition), 18 (scheme of works construction), 46 (flank wall design and restriction on clear glazing) and 47 (cleaning, maintenance and access to the flank wall) and the S.106 agreement.
380. The owner of 55-56 Aldgate High Street currently has an application pending with the Local Planning Authority for:
- Demolition of existing building at 55-56 Aldgate High Street and erection of replacement ground plus 13-storey mixed-use building comprising; 287 sqm (GIA) of office floorspace (Use Class E) at basement, ground and first floor levels; 41no. residential units (Class C3); office terrace at first floor level; residential balconies, landscaping and cycle parking, and associated works (ref. 21/00313/FULMAJ).
381. As set out in the Daylight/Sunlight section of the report an assessment has been made as to the impact of the revised scheme on the daylight/sunlight available to windows and rooms in the residential

development proposed at 55 – 56 Aldgate High Street. The assessment shows that while there would be some VSC transgressions, all rooms would be BRE compliant in respect of the NSL test.

382. In the light of the above design revisions and the outcome of the daylight/sunlight assessment, it is not considered that the revised scheme would prejudice the development potential of the adjoining site for the proposed scheme. Similarly, it is not considered that the proposal would prejudice the future development of the site for office use should it come forward as part of a larger redevelopment in the future, in accordance with policy DM1.2 of the Local Plan.

### **CIL and Planning Obligations**

383. 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.
384. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
385. From 1st April 2019 Mayoral CIL 2 (MCIL2) supersedes the Mayor of London's CIL and associated section 106 planning obligations charging schedule. This change removes the Mayors planning obligations for Crossrail contributions. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).
386. The office building (including the relocation of the Still and Star Public House) being proposed through this application measures 33,284sqm (GIA) total, consisting of 32,613sqm of Office (Class E) floorspace, 402sqm of Retail (Class E) floorspace, 269sqm of (Still and Star Public House, sui generis).
387. The CIL and Planning Obligations are applicable and have been calculated on the increased floorspace over that approved by the RTG scheme.
388. CIL contributions and City of London Planning obligations are set out below.

## MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (Excluding Indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
<b>MCIL2 payable</b>	£2,781,337	£2,670,084	£111,253

## City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (Excluding Indexation)	Available for allocation	Retained for administration and monitoring
<b>City CIL</b>	£1,128,375	£1,071,956	£56,419
<b>City Planning Obligations</b>			
<b>Affordable Housing</b>	£752,250	£744,727	£7,523
<b>Local, Training, Skills and Job Brokerage</b>	£451,350	£446,836	£4,514
<b>Monitoring Charge</b>	£4,750		£4,750
<b>Section 278 Agreement (Evaluation &amp; Design)</b>	£50,000	£50,000	£0
<b>Total liability in accordance with the City of London's policies</b>	<b>£2,537,175</b>	<b>£2,462,466</b>	<b>£74,709</b>

## City's Planning Obligations

389. In addition to the above, the following obligations will also be secured through the S106 Agreement:

- Contribution of £15,500 for early life skills in the Portsoken Ward, in particular in the Aldgate School (formerly the Sir John Cass's Foundation) to fund a new Speech and language room (£12,500) and Chromebooks costing £3,000.

- Legible London Contribution TBC
- Section 278 Agreement (Little Somerset Street, Harrow Alley and Hostile Vehicle Measures for new pedestrian routes)
- Removal and relocation of bronze sculpture ('Ridirich' by Keith McCarter) as part of the Cultural Plan
- Travel Plan (including Cycling Promotion Plan)
- Section 278 or Section 106 Agreement with Transport for London (New pedestrian crossing at the junction of Mansell Street with Alie Street and improvements to other crossings forming part of the Transport for London Road Network).
- Dedication of Public Highway or City Walkway (Arcade between Aldgate High Street to Little Somerset Street)
- Pedestrian Routes (Specification and Access)
- Retention of the current Architect in respect of detailed design for the new Still and Star.
- Securing of the party wall detail with 55 – 56 Aldgate High Street.

390. Planning Obligations in relation to the original permission (ref: 13/01055/FULMAJ) were secured through the Section 106 Agreement dated 30 June 2014. The Section 106 Agreement was subsequently amended by two Deeds of Modification dated 18 March 2016 and 20 March 2018. A further deed of modification is currently being negotiated to separate the buildings on the site as set out in the main body of the report. This proposal for a standalone office building will have a separate planning agreement which would include covenants relating to the shared areas on the site such as the basement servicing area and the open spaces around the site.

391. The matters below would be secured in the agreement.

- Highway Reparation and other Highways Obligations
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy (Demolition & Construction)
- Delivery and Servicing Management Plan (including Consolidation)
- Carbon Offsetting
- Utility Connections
- Open Space Phasing Plan & Maintained Land
- Development Phasing and Basement Access

392. 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.

### **Monitoring and Administrative Costs**

393. 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.

394. 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**

395. The City will use CIL to mitigate the impact of development and provide the infrastructure necessary for the area. 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**

396. 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 including SPDs and SPGs, the NPPF, the emerging Local Plan and considering all other material considerations.
397. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and 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 considerations indicate otherwise.
398. In this case the proposals are considered to comply with a number of policies in the development plan in particular those which relate to the provision of office development in the City, high quality accessible public realm and sustainable development.
399. The revised scheme would achieve the regeneration of an underutilised site in a pivotal location off Aldgate High Street. The proposal would deliver office space with logical floor plates, a new social and cultural facility for the City through the provision of a uniquely reimagined historic pub and an improved contribution to the townscape forming a bookend to the smaller Aldgate High Street frontages.
400. The proposed quantum of office floorspace is welcomed and would contribute to the City's role as a leading centre for business and employment in line with the London Plan and the Local Plan. The retail floorspace would enliven the area and would provide facilities for neighbouring communities. The pedestrian routes and public realm improvements would enhance the area. The scheme would align with the aspirations for the Aldgate area as set out in the Local Plan.
401. When the RTG scheme was considered by Members in December 2020 the Still and Star public house was an Asset of Community value. The Asset of Community Value designation lasts for five years. As such this status expired on the 15th November 2021. To date there has been no

request to renew or amend the listing and therefore the Still and Star's Asset of Community Value status has now ceased.

402. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 has been applied and great weight has been given to the need to preserve the setting of the surrounding listed buildings St Botolph's Church (Grade I listed), Aldgate School (Grade II\* listed), 48 and 49 Aldgate High Street (Grade II listed), 47 Aldgate High Street (Grade II\* listed) and 46 Aldgate High Street (Grade II\* listed). It is not considered that the proposal would detract from the significance of the settings of the relevant listed buildings and their special architectural and historic interest would be preserved.
403. The proposed scheme would not harm the setting, integrity or authenticity of the Tower of London World Heritage site in accordance with policy HC2 of the London Plan, policy CS12 of the Local Plan 2015 and policy S11 of the emerging City Plan 2036.
404. The proposal would not harm the characteristics of composition of the strategic LVMF Townscape View 25A.1-3 (Queen's Walk), or that of a landmark element, and would preserve the viewer's ability to recognise and appreciate the Strategically Important Landmark, the Tower of London World Heritage Site, in accordance with London Plan policy HC4 and Local Plan policy CS13 (1).
405. The proposal would preserve views of St Botolph's Church, a Skyline Feature, and the Tower of London World Heritage Site, a City Landmark, in accordance with Local Plan Policy CS12 (2) and associated guidance in the Protected Views SPD.
406. Through the revisions to the scheme the applicant has enhanced the environmental performance of the building. As such an 'excellent' BREEAM rating is now being targeted compared to a 'very good' rating under the RTG scheme. Subject to conditions requiring wind mitigation the proposal would have an acceptable impact on the microclimate around the site and the quantum of proposed greening is welcomed.
407. Transport matters have been satisfactorily addressed. The proposal would result in the loss of some public highway but this would be offset by the provision of attractive and logical new pedestrian routes and through the provision of enhanced public realm.
408. The proposal would result in some daylight and sunlight transgressions to surrounding residential dwellings. However, taking into account BRE Guidance, the nature of the results (including some low existing daylight values), the site's location within a dense urban environment and the types of residential accommodation, it is not considered that the proposal would result in an unacceptable impact on the existing properties and would not noticeably reduce the daylight to nearby dwellings to unacceptable levels such that it would warrant a refusal of planning permission.
409. The concerns raised under the RTG scheme by the owner of 55/56 Aldgate High Street regarding the design of the party wall of the office development prejudicing development potential of the adjoining site,

have been addressed by the proposed design revisions and would be secured by condition and the S.106 agreement. An assessment has also been made as to the daylight/sunlight impacts of this revised office development on the proposed residential scheme currently pending consideration at 55/56 Aldgate High Street in order to ensure that the office development would not prejudice the delivery of the adjacent scheme should planning permission be granted for the adjacent development.

410. Overall it is considered that the proposal represents high quality commercial led development that would have a positive impact on the Aldgate area.
411. It is acknowledged that the proposal would be contrary to policies CS12 and DM12.1 of the Local Plan and policy HC1 of the London Plan in respect of the total loss of the Still and Star as a non-designated heritage asset.
412. The heritage policies in the London Plan (in particular HC1) and in the Local Plan (in particular CS12) do not incorporate a balancing exercise as found in paragraph 203 of the NPPF (relating to non-designated heritage assets). As a result, if a proposal results in any harm to the significance of a heritage asset, even if at the lower end of the scale, it will result in conflict with heritage policies. As set out above the application proposals conflict with policies CS12, DM12.1 and London Plan policy HC1 in respect of heritage matters.
413. In respect of non-designated heritage assets, NPPF paragraph 203 requires that 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. The paragraph 203 weighing exercise is to be considered in respect of the total loss of the Still and Star.
414. It is considered that the proposed level of loss would be outweighed by the merits of the proposal which include the provision of a re-imagined Still and Star public house which would embody elements of significance from the existing public house.
415. The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to the general planning obligations there would be site specific measures secured in the S106 Agreement. Together these would go some way to mitigate the impact of the proposal
416. It is the view of officers that the proposal complies with the development plan when considered as a whole and that other material considerations also indicate that planning permission should be granted as set out in the recommendation and the schedules attached.

## **Appendix A**

### **Background Papers - Revised Scheme**

#### **Application Documentation**

Daylight and Sunlight Cumulative Impact 55 – 56 Aldgate High Street, GIA, April 2022

Daylight and Sunlight Report, Appendices, Window Maps, GIA, March 2022

Daylight and Sunlight, Radiance Based Assessments, March 2022

Archaeological Desk-Based Assessment, Museum of London Archaeology, November 2021

Wind Microclimate, CFD Pedestrian Comfort Assessment Revision 01, Hoare Lea, January 2022

Cover Letter, DP9, 8 December 2021

Statement of Community Involvement, Four, October 2021

Air Quality Assessment/Air Quality Assessment Addendum, WSP, November 2021

Biodiversity Net Gain Assessment, WSP, November 2021

BREEAM Statement, Hoare Lea, November 2021

Circular Economy Statement, Hoare Lea, November 2021

Construction Logistics Plan, MACE, November 2021

Cultural Plan Addendum, acme, November 2021

Delivery and Servicing Plan, WSP, November 2021

Energy Statement Addendum, Hoare Lea, November 2021

Equalities Impact Screening, WSP, November 2021

Flood Risk Assessment, WSP, November 2021

Health Impact Assessment, WSP, November 2021

Landscape and Public Realm Strategy, Spacehub, November 2021

Light Pollution Assessment, GIA, November 2021

Outdoor Thermal Comfort Assessment, WSP, November 2021

Outline Construction Environmental Management Plan, MACE, November 2021

Preliminary Ecological Appraisal, WSP, November 2021

Preliminary Risk Assessment, WSP, November 2021

Drainage Strategy Addendum, WSP, November 2021

Smart Infrastructure, Hoare Lea, November 2021

Solar Glare Assessment, GIA, November 2021

Sustainability Assessment, WSP, November 2021

Townscape and Visual Impact Assessment Addendum, City Designer & Miller Hare, November 2021

Utilities Statement, Hoare Lea, November 2021

Whole Life Carbon Statement, Hoare Lea, November 2021

Wind Microclimate Study, WSP, November 2021

Noise Assessment Addendum, Hoare Lea, November 2021

Design and Access Addendum, ACME and David Bonnett Associates, November 2021

Planning Statement Update, DP9, November 2021

Operational Waste Management Plan, WSP, November 2021

Transport Assessment, WSP, November 2021

Travel Plan, WSP, November 2021

### **Consultation Responses**

06.04.2022 Memo CoL, Department of Markets and Consumer Protection

31.03.2022 Memo Lead Local Flood Authority

24.03.2022 Transport for London, London Underground

21.03.2022 Transport for London, City Planning

17.03.2022 Thames Water

26.02.2022 London and Middlesex Archaeological Society

16.02.2022 London Borough Tower Hamlets

14.02.2022 London Borough Southwark

10.02.2022 Transport for London, London Underground

01.02.2022 Lead Local Flood Authority

28.01.2022 Memo CoL, Environment Department

28.01.2022 Thames Water

27.01.2022 Transport for London, London Underground

20.01.2022 Thames Water  
18.01.2022 Memo, CoL, Department of Markets and Consumer Protection  
16.01.2022 CAMRA  
06.01.2022 Memo CoL, Department of Markets and Consumer Protection

## **Representations**

### **Revised Scheme**

11.04.2022 H Company 3 Limited  
30.03.2022 Roger Jones  
30.03.2022 Celine Lutz  
29.03.2022 Duncan Gates  
20.03.2022 Jess Cooper  
19.03.2022 Emma Cornish  
17.03.2022 Angela Wood  
17.01.2022 Damien Errington  
05.01.2022 Peter Bkair

**Background Papers – RTG scheme (full details and copies of representations are available to view at <https://democracy.cityoflondon.gov.uk/mgChooseDocPack.aspx?ID=20597>)**

### **Representations**

27.07.2016 Comment Chris Smith  
27.07.2016 Comment Richard Williamson  
27.07.2016 Comment Adair Halliday  
27.07.2016 Comment James Manning  
27.07.2016 Comment John Evans  
04.08.2016 Comment Glen Leeder  
04.08.2016 Comment John Evans  
04.08.2016 Comment Jane Jewell  
04.08.2016 Comment C Pertwee  
04.08.2016 Comment Douglas Haywood  
04.08.2016 Comment Andrew Altmann  
04.08.2016 Comment Caroline Bottomley  
04.08.2016 Comment Jonathan Taylor  
04.08.2016 Comment Lyndy Jacquot  
04.08.2016 Comment Carlos Hood  
04.08.2016 Comment Christina Pullam  
04.08.2016 Comment Harriet Connides  
04.08.2016 Comment Ian Dicks  
04.08.2016 Comment Shawdian Uttley  
04.08.2016 Comment Elizabeth Burling  
04.08.2016 Comment David Milne  
04.08.2016 Comment Adele Schlazer-Lester  
04.08.2016 Comment Tristan O'Dwyer  
04.08.2016 Comment Howard Clark  
04.08.2016 Comment James Bramble  
04.08.2016 Comment Kate Bowgett

04.08.2016 Comment Patrick Nicholas  
04.08.2016 Comment Matt Nicholls  
04.08.2016 Comment Richard Pascoe  
04.08.2016 Comment Michael Collard  
04.08.2016 Comment Elizabeth Waight  
04.08.2016 Comment Chris Ashby  
04.08.2016 Comment Chris Berthohd  
05.08.2016 Comment Colin Toogood  
05.08.2016 Comment Peter Dray  
05.08.2016 Comment Andrew Brown  
05.08.2016 Comment Kris O'Kane  
05.08.2016 Comment Kenneth Orr  
05.08.2016 Comment Max Goldman  
05.08.2016 Comment James Ford  
05.08.2016 Comment Sarah-Jayne Bray  
05.08.2016 Comment Daniel Couzens  
05.08.2016 Comment Vicky Stewart  
05.08.2016 Comment Craig Thomas  
05.08.2016 Comment Iain Chambers  
05.08.2016 Comment Zena Sullivan  
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15.08.2016 Comment James Watson (East London & City branch of CAMRA)  
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23.08.2016 Comment James Champness  
24.08.2016 Comment Martin Cummins  
25.08.2016 Comment Simon Williams

26.08.2016 Letter William Campbell-Taylor  
26.08.2016 Comment John Sinha  
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07.11.2016 Comment Gary Meaton  
08.11.2016 Comment Jonathan Smith  
20.11.2016 Comment Ruth Richardson  
28.11.2016 Comment Del Campbell  
12.12.2016 Comment Mathew Chambers  
12.12.2016 Comment Steven Hanscomb

17.12.2016 Comment Robert Picking  
09.01.2017 Letter Desmond Fitzpatrick  
15.11.2017 Comment Marc Haynes  
15.01.2018 Email Steve Hanscomb  
11.01.2019 Comment Seb Brennan  
11.01.2019 Comment Richard Williamson  
11.01.2019 Comment Peter Caseley  
11.01.2019 Comment Pat Taylor  
12.01.2019 Comment James White (Comment)  
12.01.2019 Comment Ruth Murray  
13.01.2019 Comment A McEvoy  
15.01.2019 Comment Stuart MacKay  
19.01.2019 Comment Anthony Taylor  
19.01.2019 Comment Emma Nagle  
19.01.2019 Comment Susan Drees  
19.01.2019 Comment William Wilkes-Wood  
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19.01.2019 Comment Wanda Ashman  
19.01.2019 Comment Robin Greeley  
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23.01.2019 Comment David Anderson  
29.01.2019 Letter J Cooper  
30.01.2019 Comment Emily Lane  
30.01.2019 Comment Theresa Pine  
30.01.2019 Comment Harry Boggis-Rolfe  
30.01.2019 Comment Peter Thomas  
30.01.2019 Comment Wendy Forrest  
31.01.2019 Comment Tom Killick  
31.01.2019 Comment Angela Wood

04.02.2019 Comment Peter Dragonetti  
05.02.2019 Comment Duncan Gates  
06.02.2019 Comment Lee Christensen  
19.02.2019 Comment Sebastian Enser-Wight (support)  
22.02.2019 Comment M O'Rorke  
13.03.2019 Comment Nicola Barker  
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21.08.2019 Comment Wyn Morgan  
22.08.2019 Comment Bridget Furst  
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30.08.2019 Comment Adam Glisson  
30.08.2019 Comment John Gallinari  
31.08.2019 Comment Manuel Rodrigues  
17.11.2019 Comment Barry Klein  
01.12.2020 Comment H Company Ltd  
092-O-ACME-ST1-00-0008-E Existing Public Highway  
092-O-ACME-ST1-00-0009-C Building over existing Public Highway  
092-O-ACME-ST1-00-0010-B Projection over Public Highway  
092-O-ACME-ST1-00-0011-C Projection below Public Highway  
092-O-ACME-ST1-00-0016-B Public Highway After Completion  
092-O-ACME-ST1-00-0017-B Stopping up – Dedication  
Planning Statement March 2016 and March 2019 Gerald Eve  
Design and Access Statement March 2016 ACME  
Demolition management Plan March 2016 Coleman Group  
Energy and Sustainability Statement March 2016 RED  
Historic Environment Statement March 2016 MOLA  
Noise Assessment November 2015 Cole Jarman

Preliminary Ecological Assessment March 2016 The Ecology Consultancy  
Statement of Community Involvement March 2016 4 Communications  
Townscape and Visual Impact Assessment March 2016 Peter Stewart  
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Transport Assessment March 2016 Grontmij  
Air Quality Assessment June 2016 and September 2016 Air Quality  
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Drainage Assessment Report June 2016 AKT Ltd  
E mail 15.07.2016 Environment Agency  
Letter 27.07.2016 Historic England  
Letter 03.08.2016 LB Tower Hamlets  
E mail 04.08.2016 Transport for London  
Letter 05.08.2016 The Victorian Society  
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Letter 17.08.2016, 16.12.2016, London Underground  
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Transport Assessment January 2019 SWECO  
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Air Quality Consultants – Air Quality Neutral Assessment October 2020

GIA Daylight and Sunlight report March 2019

Temple Rapid Health Impact Assessment November 2020

Hoare Lea BREEAM comparison 2014 to 2018

Akt II Circular Economy Statement November 2020

BB7 Fire Strategy Report November 2020

ACME Cultural Plan November 2020

E mail 01.12.2020 Transport for London

## **Appendix B**

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

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

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

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

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

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

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

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

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

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

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

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

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

Policy 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 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 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 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

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

CV5 Public Art

S7 Smart Infrastructure and Utilities

S8 Design

DE1 Sustainability requirements

DE2 New development

DE3 Public realm

DE4 Pedestrian permeability

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  
S13 Protected Views  
S14 Open spaces and green infrastructure  
OS2 City greening  
OS3 Biodiversity  
OS4 Trees  
S15 Climate resilience and flood risk  
CR1 Overheating and Urban Heat Island effect  
CR2 Flood Risk  
CR3 Sustainable drainage systems (SuDS)  
S16 Circular economy and waste  
CE1 Zero Waste City  
S20 Aldgate, Tower and Portsoken  
S27 Planning contributions

## Relevant Local Plan Policies

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

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

### ***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.

### ***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.

### ***CS4 Seek planning contributions***

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

### ***CS8 Meet challenges facing Aldgate area***

To regenerate the amenities and environment of the Aldgate area for businesses, residents, workers, visitors and students, promoting development and investment.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### ***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.

### ***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.

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

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

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

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

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

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

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

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

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

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

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

### ***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.

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

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

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;

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

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

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

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

### ***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.

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

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

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

#### ***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.

#### ***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.

### ***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.

### ***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.

### ***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.

### ***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.

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

1. The amenity of existing residents within identified residential areas will be protected by:
  - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
  - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

## SCHEDULE

APPLICATION: **16/00406/FULMAJ**

**15 Minorities, 57-60 & 62 Aldgate High Street And 1 Little Somerset Street  
London EC3**

**Demolition of existing structures, and erection of a mixed use office building, including ground floor flexible retail/cafe/commercial uses (Class E) and a public house (sui generis) (35,672 sqm GEA).**

## CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of five years from the date of this permission.  
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 No part of the Still and Star public house shall be demolished before a contract or series of contracts have been made for the carrying out of substantial works of redevelopment and planning permission has been granted for the development for which the contracts provide. Such contracts shall include the construction of all foundations, above ground framework and floor structures.  
REASON: To ensure the protection of the public house as a cultural facility and non-designated heritage asset, until a replacement has been secured in accordance with the following policies of the Local Plan: DM11.1, DM12.1.
- 3 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 (including any agreed monitoring contribution) set out therein. The applicant shall consult the owners and occupiers of 55-56 Aldgate High Street no less than one month prior to the submission of the approval of details for this condition. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)  
REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan:

DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

- 4 Prior to the commencement of the development a detailed Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.  
REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; 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 starts.
- 5 Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details 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. No demolition or construction shall be carried out other than in accordance with the approved details and methods.  
REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy T4 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.
- 6 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.

- 7 The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for the proposed demolition and excavation works and all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

- . provide details on all structures;
- . provide details of tall plant and scaffolding;
- . accommodate the location of the existing London Underground structures;
- . demonstrate that there will at no time be any potential security risk to the railway, property or structures;
- . accommodate ground movement arising from the construction thereof; and
- . mitigate the effects of noise and vibration arising from the adjoining operations within the structures.

The development shall be carried out strictly in accordance with the details so approved and no change therefrom shall take place without the prior written consent of the Local Planning Authority and London Underground.

REASON: To enable the Local Planning Authority and Transport for London to ensure that works during demolition, construction and operation will not have adverse impacts on existing London Underground tunnels, in accordance with London Plan policy T7.

- 8 Before any works including demolition are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels

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

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

- 9 No demolition shall take place until the developer has secured a standing building survey and recording of the Still and Star Public House to be carried out in accordance with a written scheme of recording which has been submitted to and approved by the Local Planning Authority. All works must be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.

REASON: To ensure that a record of the building is made, and incorporated in the publication and archiving of the archaeological record of the site in accordance with the following policies of the Local Plan: CS12, DM12.1.

- 10 Prior to the commencement of demolition works the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.
- REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

- 11 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation

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

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

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

- 12 Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken 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 must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.  
REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
  
- 13 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.

- 14 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.  
REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.
- 15 No works except demolition to basement slab level 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.
- 16 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.
- 17 No development other than demolition shall take place until the detailed design of all wind mitigation measures including the proposed landscaping and details of the revised location of the pass door and retail entrances have 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 an updated wind assessment has been submitted to and approved in writing by the Local Planning Authority to demonstrate that the revised pass door and retail

entrances would be suitable for their intended purpose and the approved wind mitigation measures have been implemented in accordance with the approved details 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 in writing 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.

- 18 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 (including any agreed monitoring contribution) set out therein. The applicant shall consult the owners and occupiers of 55-56 Aldgate High Street no less than one month prior to the submission of the approval of details for this condition. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)

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

- 19 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.

- 20 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 T7 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.

- 21 The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun. The measures shall be implemented 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.

- 22 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 (as described by the Drainage Assessment Report Revision A 03/06/2016 and updated by subsequent emails 08/09/2016 -27/10/2016) including but not limited to: attenuation systems, pumps, design for system exceedance, construction plan, cost etc. The surface water discharge rates should not exceed the values proposed and the actual attenuation volume capacity should be no less than 250m<sup>3</sup>; unless otherwise agreed with the Lead Local Flood Authority;
- (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 discharged rate to be satisfactory.

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

- 23 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) A Lifetime Maintenance Plan for the SuDS system to include:
    - A full description of how the system would work, it's aims and objectives and the flow control arrangements;
    - A Maintenance Inspection Checklist/Log;
    - A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.
- REASON: To improve sustainability, reduce flood risk and reduce water run off rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
- 24 Details of the construction, planting irrigation and maintenance regime for the proposed green wall(s)/roof(s) 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 unless otherwise approved by the local planning authority.
- REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 25 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) particulars and samples of the materials to be used on all external faces of the development including external ground and upper level surfaces;
- (b) details of a typical bay of the development;
- (c) details of the vaulted arcade around the base of the building;
- (d) details of the proposed roof terraces;
- (e) details of the ground floor office entrances including details of a replacement entrance arrangement for the revolving doors and a revised location for the pass door;
- (f) details of soffits, hand rails and balustrades;
- (g) details of junctions with adjoining premises;
- (h) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level;
- (i) details of external surfaces within the site boundary including hard and soft landscaping;
- (j) details of the shopfronts;
- (k) details of the facades to the public house;
- (l) details of the artwork to be incorporated into the exterior of the public house;
- (m) details of the design and location of an interpretation board that would be incorporated into the design of the scheme and contain information about the history of the existing Still and Star public house;
- (n) details of the boundary to the adjacent bus station site;
- (o) details of the manoeuvring space on the terraces.

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: CS10, DM10.1, DM10.5.

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

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

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

details approved must be implemented before the retail use takes place.

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

- 28 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Class A use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class A use takes place.  
REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.
- 29 Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.  
Reason: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and PM2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.
- 30 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
- 31 Details of the rainwater harvesting and greywater collection systems, to include the location of tanks and areas/locations of use for the collected water, shall be submitted to and approved in writing by the Local Planning Authority. The harvesting and collection systems shall be implemented in accordance with the approved details.

REASON: To assist the environmental sustainability of the development and its resilience and adaptation to climate change in accordance with the following policies of the Local Plan: CS15, DM15.1, DM15.5.

- 32 All unbuilt surfaces, forming part of the development including the ground floor public realm, pedestrian route through and rooftop terrace, shall be treated in accordance with a landscaping scheme 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. 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 5 years of completion of the development shall be replaced with trees and shrubs of similar 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.

- 33 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 unless otherwise approved by the local planning authority.

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

- 34 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.

- 35 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 be 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.
- 36 Prior to the commencement of the relevant works, a full Lighting Strategy for external lighting and the proposed controlled internal system shall be submitted to and approved in writing by the Local Planning Authority, which shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity. The development shall be carried out and maintained in accordance with the details of the approved 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, DM 15.7 and emerging policy DE2 of the Draft City Plan 2036.
- 37 Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.  
REASONS: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.
- 38 Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority . The postconstruction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3),

including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.

Reason: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.

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

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

- 40 No development shall be occupied until confirmation has been provided that either:- 1. Surface water capacity exists off site to serve the development or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. 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. Or 3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed.

Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](http://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

- 41 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.

- 42 The roof terraces hereby permitted shall not be used or accessed between the hours of 21.00 on one day and 8.00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.  
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7 and DM21.3.
- 43 Prior to the installation of any generator. A report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose and shall not be used at any other time.  
Reason: In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.
- 44 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.
- 45 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.
- 46 Before any works thereby affected are begun all exposed flank or party walls must be faced or treated in accordance with details to be submitted to and approved in writing by the Local Planning Authority. All development pursuant to this condition shall be carried out in accordance with the approved details and implemented prior to first occupation. The approved party wall treatment (to include obscure glazing) shall be maintained as such for the life of the building. No clear glazing shall be installed on the east facing flank elevation of the office building adjoining 55-56 Aldgate High Street for the life of the building.  
REASON: In the interests of visual amenity in accordance with the following policy of the Local Plan: DM10.1, DM1.2.

- 47 Before any works thereby affected are begun a scheme which specifies the strategy for cleaning, maintenance, repair and access of the east facing flank elevation of the office building shall be submitted to and approved in writing by the Local Planning Authority. The cleaning, maintenance, repair and access arrangements shall be carried out in accordance with the approved details.  
REASON: To safeguard the amenity of the adjoining premises in accordance with the following policies of the Local Plan: DM15.7, DM21.3, CS10.
- 48 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.
- 49 The office development shall not be occupied until the Still and Star public house has been completed and is ready for occupation in accordance with the terms of this permission and any approved details pursuant to conditions of the permission.  
REASON: To ensure that the whole development is satisfactorily completed in accordance with the following policies of the Local Plan: DM11.1.
- 50 No doors, gates or windows at ground floor level shall open over the public highway.  
REASON: In the interests of public safety
- 51 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 544 pedal cycles (488 long stay spaces and 56 short stay spaces and 5% shall be accessible). 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.
- 52 Changing facilities and showers shall be provided in conjunction with 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.

- 53 No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.  
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.
- 54 (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.
- 55 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.  
REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.
- 56 The areas of public highway on the site shall remain fully open and unobstructed until such time as the necessary Stopping-up Order has come into effect.  
REASON: To ensure compliance with the terms of Section 247 and 257 of the Town and Country Planning Act 1990.
- 57 A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all

reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.

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

- 58 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.

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

- 59 The pass door shown adjacent to or near 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 people with mobility disabilities are not discriminated against and to comply with the following policy of the Local Plan: DM10.8.

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

REASON: To ensure that a varied mix of retail types is provided within the development in accordance with the following policies of the Local Plan: CS20 and CS9.

- 61 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:

092-O-ACME- ST1-00-0001 rev. D  
092-O-ACME- ST1-00-0002 rev. D  
092-O-ACME- ST1-00-0003 rev. D  
092-O-ACME- ST1-00-0004 rev. E  
092-O-ACME- ST1-00-0005 rev. E  
092-O-ACME- ST1-00-0006 rev. D  
092-O-ACME- ST1-00-0007 rev. D  
092-O-ACME- ST1-00-0011 rev. D

092-O-ACME- ST1-00-0017 rev. C  
092-O-ACME- GA1-00-1100 rev. F  
092-O-ACME- GA1-01-1101 rev. B  
092-O-ACME- GA1-02-1102 rev. B  
092-O-ACME- GA1-03-1103 rev. B  
092-O-ACME- GA1-04-1104 rev. B  
092-O-ACME- GA1-05-1105 rev. B  
092-O-ACME- GA1-06-1106 rev. B  
092-O-ACME- GA1-07-1107 rev. B  
092-O-ACME- GA1-08-1108 rev. B  
092-O-ACME- GA1-09-1109 rev. C  
092-O-ACME- GA1-10-1110 rev. B  
092-O-ACME- GA1-11-1111 rev. C  
092-O-ACME- GA1-12-1114  
092-O-ACME- GA1-13-1115  
092-O-ACME- GA1-14-1116  
092-O-ACME- GA1-RF-1117  
092-O-ACME- GA1-MZ-1118  
092-O-ACME- GA1-B1-1119 rev. C  
092-O-ACME- GA1-B2-1120 rev. B  
092-O-ACME- GA1-B3-1121  
092-O-ACME- GA1-00-1150 rev. D  
092-O-ACME- GA1-B1-1152 rev. A  
092-O-ACME- GA2-XX-1200 rev. C  
092-O-ACME- GA2-XX-1201 rev. C  
092-O-ACME- GA2-XX-1202 rev. C  
092-O-ACME- GA3-XX-1300 rev. C  
092-O-ACME- GA3-XX-1301 rev. C  
092-O-ACME- GA3-XX-1302 rev. C  
092-O-ACME- GA3-XX-1303 rev. C  
092-O-ACME- BC1-XX-2100 rev. A  
092-O-ACME- BC1-XX-2101 rev. A  
092-O-ACME- BC1-XX-2102 rev. A  
092-O-ACME- BC1-XX-2103 rev. A  
092-O-ACME- BC1-XX-2104 rev. A

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 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 02035779483 or by emailing

wwriskmanagement@thameswater.co.uk. Application forms should be completed online via [www.thameswater.co.uk/wastewaterquality](http://www.thameswater.co.uk/wastewaterquality).

- 2 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.
- 3 There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the

necessary processes you need to follow if you're considering working above or near our pipes or other structures. Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)

Wastewater: For a site which is roughly 0.3ha and going through a full demolition process, the expectation is for SW to discharge at Greenfield rates of 5l/s/ha and at max 2l/s for the site proposed. This has been achieved all across London and with various developments with the current technology at hand and the expectation is for this to continue. Hence, 2l/s max. discharge rate should be achievable for this development at current level of technology which will be acceptable.

Foul capacity - (discharge to the combined public sewer in Little Somerset Street 1219mm sewer); Capacity ok within sewer threshold as per previous Consultation back in 2019. If there are changes to Foul drainage system then please let us know directly and specifically of any changes which we can then review swiftly and efficiently.

- 4 The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP. In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

- 5 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.
  
- 6 This approval relates only to the details listed above and must not be construed as approval of any other details shown on the approved drawings.