Committee:	**Date:**
Planning and Transportation	19 July 2022
Subject: Boundary House 7 - 17 Jewry Street London EC3N 2EX. Demolition of the building and the erection of a basement, ground plus part 14 storey and part six storey building plus plant comprising of a 311 bedroom hotel with a ground floor cafe/bar and roof top restaurant (Use Class C1) and office floorspace (Use Class E) at part ground and part first floor with ancillary community uses, hard and soft landscaping, cycle parking and associated works.	**Public**
Ward: Tower	**For Decision**
Registered No: 21/00826/FULMAJ	**Registered on:** 30 September 2021
Conservation Area: No	**Listed Building:** No

Summary

The application proposes the demolition of an office building and erection of a ground plus part seven and part 14 storey hotel with 311 rooms, with plant above, with ancillary ground floor café/bar and rooftop restaurant (both accessible to the public), and 456 sqm of Use Class 'E' commercial space at part ground and part first floors principally for coworking use, with ancillary community and cultural uses.

Two objections have been received. This includes an objection from a resident in City of Westminster objecting to the demolition of an existing building on aesthetic and sustainability grounds, and from an education use opposite the Site (The Portal Trust) citing rights to light. A neutral comment was received on behalf of nearby residents at 27 Minories querying impact to local sewers.

The original submission has been revised following Officer comments including amendments to building massing, design, materiality, and an alternative servicing location.

The Applicant has justified the loss of office at the site. It is considered that the loss of office floorspace, and the proposed hotel use, with a small quantum of office floorspace, would not compromise the primary business function of the City, with hotels supported as a strategic function of the Central Activities Zone

(CAZ) and the London Plan stating that 58,000 rooms for serviced accommodation will be required in London by 2041. The hotel would contribute to the balance and mix of uses in the area and would offer complimentary facilities to be accessed by the public.

The Local Plan promotes the delivery of community and cultural facilities, therefore the use of the coworking space for the community for free and discount rates is supported, subject to obligations to maximise the benefits of the uses.

The development meets key sustainability aims including retention of part of basement and part of ground structures. The proposal would comprise an all-electric system including utilising Air Source Heat Pumps and PV panels. The Applicant would achieve BREEAM 'Excellent' and 54% of operational carbon savings against the baseline (policy target = 35%). The quantum of proposed greening is policy compliant with 45 trees proposed at roof level and includes green and blue roofs.

The development represents high quality design, which has been revised following Officer comments, and would contribute to public realm through planters, seating and footway widening on Jewry Street.

The hotel will provide step free access with 10% accessible bedrooms and an accessible car parking bay on street.

Great weight has been given to the need to the need to preserve the setting of the nearby listed building at 31 Jewry Street. It is not considered that the proposal would detract from the significance of the setting of the listed building and the special architectural and historic interest would be preserved.

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 Applicant is proposing on-site servicing with consolidation of deliveries, to be capped at 12 deliveries per day and restricted to outside of peak times. There would be policy compliant long stay cycle parking (21 spaces) and external short stay provision (8 spaces). All servicing vehicles would be required to reverse into the off-street area in order to exit in a forward gear. This falls short of the requirements in Local Plan Policy DM16.5 which requires servicing areas to facilitate both access and egress in a forward gear. The reversing manoeuvre would however be significantly shorter and safer than the existing situation at Rangoon Street.

To facilitate the development, 23 sqm of public highway is proposed to be stopped up. Due to the area of private land proposed to be adopted as highway, there would be a net gain of highway of 15 sqm.

The proposal would result in daylight losses to nearby student residential accommodation beyond that which is recommended by the BRE and therefore is considered to be contrary to part of Local Plan Policy DM11.3 which resists new hotels which result in adverse impacts to the amenity of neighbouring occupiers. Losses beyond the BRE guidelines are likely to occur to the education use at 31 Jewry Street, however the existing levels of daylight to the property are relatively low, and electric lighting is likely to be required to all rooms in the existing condition. It is not considered that the proposed development would change the way in which the rooms are used as they already rely on electric lighting and therefore are unlikely to be materially affected. Notwithstanding, the proposal is considered to comply with the principal daylight and sunlight policy of the Local Plan (DM 10.7) as the proposal would not result in unacceptable impacts, when considering the student accommodation and the education use at Jewry Street. All impacts to permanent residential properties are within BRE guidelines therefore are considered to be negligible.

Subject to conditions requiring wind mitigation the proposal would have an acceptable impact on the microclimate on and around the site.

It is almost always the case that where major development proposals come forward 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.

The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

In this case, the proposals are considered to be in accordance with the development plan as a whole.

When taking all matters into consideration, subject to the recommendations of this report, it is recommended that planning permission be granted.

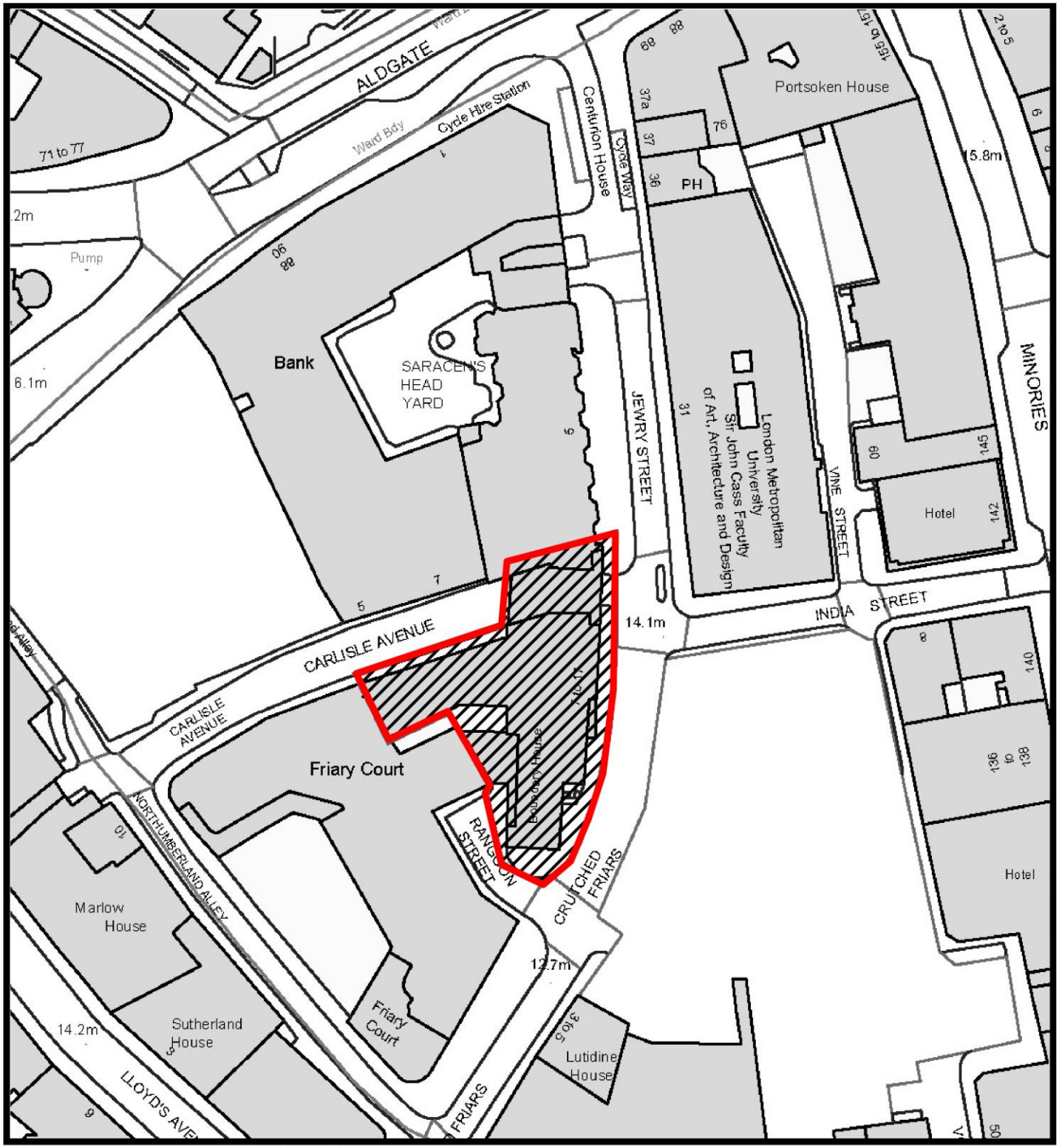
Recommendation

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 your Officers be instructed 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.

Site Location Plan



ADDRESS: Boundary House, 7-17 Jewry Street, London, EC3N 2EX

CASE No. 21/00826/FULMAJ

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

DEPARTMENT OF THE BUILT ENVIRONMENT

View looking south on Jewry Street

View looking north from Crutched Friars

View looking west from Minories

View looking south from Jewry Street

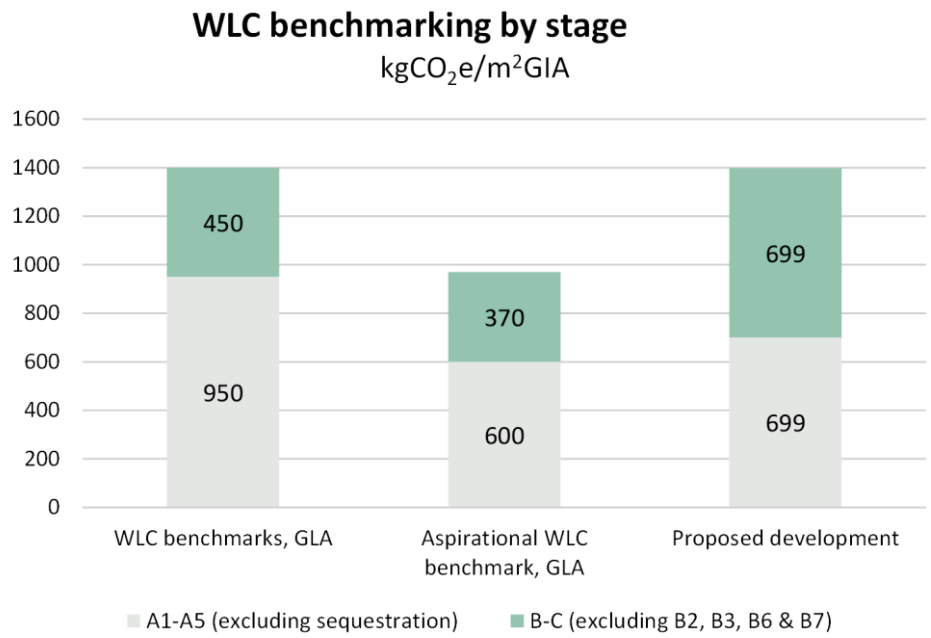
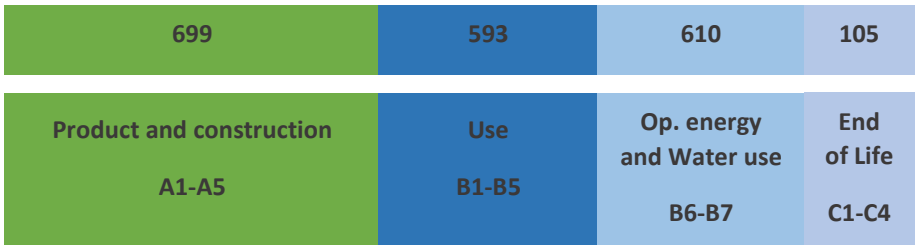
View looking east from Carlisle Avenue

Aerial view

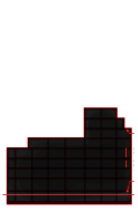
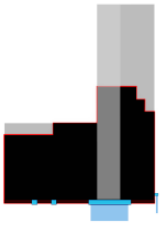
APPLICATION COVER SHEET

Boundary House – application ref. 21/00826/FULMAJ

TOPIC	INFORMATION			
1. SITE PHOTOS / VISUALS		 ** a proposed CGI*		
2. HEIGHT	EXISTING	PROPOSED		
	<u>Jewry Street block:</u> 8 storeys + plant = 40.66m AOD <u>Carlisle Avenue block:</u> 5 storeys + plant = 33.70m AOD	<u>Jewry Street block:</u> 15 storeys + plant = 64.09m AOD <u>Carlisle Avenue block:</u> 7 storeys + plant = 39.97m AOD		
3. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Class C1 Hotel	0 sqm	10,745 sqm / 311 rooms	
	Class E Office	5,821 sqm	410 sqm	(- 5,411 sqm)
	TOTAL	5,821 sqm	11,158 sqm	(+ 5,337 sqm)
			TOTAL UPLIFT:	**5,337sqm**
4. EMPLOYMENT NUMBERS	EXISTING	PROPOSED		
	• c. 40	• c. 90		
5. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	7	Car parking spaces	0
	Accessible car parking	0	Accessible car parking	1 (on street)
	Cycle long stay	7	Cycle long stay	21
	Cycle short stay	0	Cycle short stay	8
	Lockers	0	Lockers	42
	Showers	0	Showers	5
6. HIGHWAY LOSS / GAIN	1. 22.78 sq m proposed to be stopped up 2. 38.28 sq m proposed to be dedicated GAIN +15.5sqm			
7. PUBLIC REALM GAIN	1. Widening of footpath on Jewry Street and Carlisle Avenue 2. Provision of entrance steps on southern part of site with seating, planters and trees.			

8. SERVICING VEHICLE TRIPS	EXISTING	PROPOSED
	• 12 trips per day via Rangoon Street.	• 12 trips per day off street via Carlisle Avenue (off peak and consolidation strategy proposed).
9. VOLUME OF RETAINED FABRIC	5 %* *% of structural material relative to existing volume (excluding façade)	
10. OPERATIONAL CARBON EMISSION SAVINGS	• 54% improvement against Part L 2013 using SAP 10 carbon factors (policy target 35% improvement) 54 %	
11. OPERATIONAL CARBON EMISSIONS	94,059 kgCO2e/annum 8 kgCO2e/m2/annum 507 kgCO2e/m2 over 60 years (covers Module B6 only and includes the decarbonisation of the grid)	
12. EMBODIED CARBON EMISSIONS	PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS	
	 **TOTAL**: 15,548,032 kgCO2e/60 years	
13. WHOLE LIFE CYCLE CARBON EMISSIONS (kgCo2e/m2 GIA)	 TOTAL: 22,132,700 kgCO2e/60 years (accounting for decarbonisation of the grid)	

14. WHOLE LIFE-CYCLE CARBON OPTIONS	

Applicable	Existing building	Maximum retention	New superstructure	All new
Images New Existing				
Gross Internal Area (GIA)	5,770m²	10,889m²	11,121m²	11,121m²
Increase in GIA	-	5,119m²	5,351m²	5,351m²
Embodied carbon (A1-A5)	409 kgCO₂e/m² GIA	627 kgCO₂e/m² GIA	681 kgCO₂e/m² GIA	714 kgCO₂e/m² GIA
% structural material retained relative to existing volume (excluding façade)	100%	63%	5%	0%
Embodied carbon (A1-A5, B1-B5, C1-C4)	1,108 kgCO₂e/m² GIA	1,326 kgCO₂e/m² GIA	1,380 kgCO₂e/m² GIA	1,413 kgCO₂e/m² GIA
Operational energy (B6)	5,466 kgCO₂e/m² GIA	1,607 kgCO₂e/m² GIA	1,607 kgCO₂e/m² GIA	1,607 kgCO₂e/m² GIA
Fuel source	Gas	Electricity	Electricity	Electricity
Total WLCA (A1-A5, B1-B6, C1-C4, D)	6,192 kgCO₂e/m² GIA	2,552 kgCO₂e/m² GIA	2,606 kgCO₂e/m² GIA	2,639 kgCO₂e/m² GIA
Total WLCA (A1-A5, B1-B6, C1-C4, D)	35,731 tCO₂e	27,783 tCO₂e	28,976 tCO₂e	29,343 tCO₂e

15. TARGET BREEAM RATING	• **Excellent** (policy target Excellent or Outstanding) G | VG | **EXC** | OUT
16. URBAN GREENING FACTOR	• **0.32** (policy target 0.3) • 45 trees proposed (all at roof level). Street trees to be agreed via s278 agreement.
17. DAYLIGHT & SUNLIGHT	• All permanent residential properties near to the site meet the target values set out within the BRE Guidelines for daylight and sunlight. • Impacts to student residential at the Urbanest development and the education use at 31 Jewry Street range from either meeting the BRE Guidelines or experiencing minor to major adverse impacts.
18. AIR QUALITY	• Air Quality Neutral for building emissions. Does not meet Air Quality Neutral target for transport emissions however mitigation measures provided.

Main Report

Site

1. The site area is 977 sqm and comprises Boundary House, an occupied 1950s office building (5,821 sqm) located on Jewry Street at the junction of Rangoon Street and Crutched Friars which includes a basement, ground and up to seven upper storeys. It is within Tower Ward.

2. The surrounding area includes a mix of uses including commercial, permanent residential, student accommodation and educational.

3. This application includes works to Rangoon Street, the location of existing servicing access, and Jewry Street and Carlisle Avenue including areas outside the red line boundary which are therefore proposed through a separate Section 278 agreement.

4. The site does not fall within any conservation area nor is it a listed building however to the east lie sections of the Roman Wall along Jewry Street and 31 Jewry Street (Grade II), and to the north lies the Aldgate School (Grade II*). The Lloyds Avenue and Fenchurch Street conservation areas fall to the south-west and include various listed buildings.

5. The site is not within any Protected Vistas in the London View Management Framework (LVMF) however the proposed building would be visible from the Queen's Walk Townscape View (25A).

6. The site is within the Aldgate Connect Business Improvement District.

7. There is a recently completed development to the southeast ('Urbanest', ref. 17/00239/FULMAJ) granted in 2017 for a mixed used development including student residential and public access to roman wall remains. To the northwest lies ('80 Fen', ref. 15/00702/FULMAJ) granted in 2014 for an office building up to 16 storeys.

Planning History

8. The site has not been subject to relevant planning history in recent years.

Proposal

9. Planning permission is sought for the demolition of the existing office building and the erection of ground plus part seven and part 14 storey

hotel (plus plant above) at up to 64 metres AOD. This would comprise a 311 bedroom hotel (Use Class C1) with ancillary ground floor café/bar and roof top restaurant; and 456 sqm of commercial floorspace (Use Class E) at part ground and part first floor with ancillary community uses.

10. It is proposed to retain part of existing basement and ground floor levels including partial reuse of floor slab, columns and foundations. This is described in detail in the whole life-cycle carbon section of the report. The majority of the building would be demolished.

11. The proposed floorspace areas are set out in Table 2 below:

Table 1: Existing floorspace areas.

Use Class	GEA sqm	GIA sqm
Office (E)	6,310	5,821

Table 2: Proposed floorspace areas.

Use Class	GEA sqm	GIA sqm
Hotel (C1)	11,914	10,745
Office (E)	456	410
Total	**12,370**	**11,158**

12. In addition to hotel accommodation, the Proposed Development would provide coworking space which would provide ancillary community uses through the following offer (to be secured through a Section 106 agreement):

- 10 hours a month of free community use of meeting rooms;
- 10 hours a month free meeting room hire for nearby education uses (daytime);
- 10 hours a month of 50% discount rate to hire the podcast studio for local community groups;
- Podcast studio rental at £35 per hour (RPI);
- One free hire per month of event space for community groups.

13. The proposed loading bay would be located on Carlisle Avenue, and deliveries would be capped at 12 per day to take place at off-peak times, with a consolidation strategy sought through the Section 106.

14. A total of 21 long stay cycle parking spaces would be provided at basement level, and eight short stay spaces provided externally on Carlisle Avenue.

15. There is no new vehicle parking proposed within the Development Site with the exception of one disabled parking space on street.

16. The proposed development would include an extensive range of soft landscaping features to enhance urban greening and biodiversity, including at roof level, Jewry Street and Rangoon Street. The roof spaces which would not be accessible would also include greening where possible.

Consultation

17. The Applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders. This included engagement with Ward Members, the David Game College, staff at the Urbanest Student accommodation development, the Aldgate Connect BID, and letter distribution to 2,057 residential and business properties near to the Site. The proposals were advertised on social media and through a dedicated website.

18. Following receipt of the application, the application has been advertised and consulted on. Nearby residents were included in the consultations. Copies of relevant letters and emails received are attached in Appendix A.

19. In 2022, three additional consultation periods took place in April and June following the receipt of amended and additional information including as a result of reducing the massing to the south of the building to reduce impact to daylight received by the nearby student residential, relocation of the servicing from Rangoon Street to Carlisle Avenue, and design changes.

20. Views of other City of London Corporation departments have been taken into account in the preparation of this scheme and some detailed matters are addressed by the proposed conditions and the terms of the Section 106 agreement.

21. A summary of the external consultation responses is provided in the table below and responses are available to view on the public website and are listed in the background papers list at the end of this report.

22. Nearby residents, the student residential and the educational uses were consulted and two objections and one neutral comment have been received from the public.

23. The Health and Safety Executive confirmed that the development did not meet the requirements for consultation regarding Fire Safety. The submitted Fire Statement has been reviewed by the District Surveyors.

Table 3: Consultation responses

Consultee	**Summary of comments**
City Police	Confirmed that Hostile Vehicle Management not required. Raised concerns regarding theft for proposed cycle parking on Carlisle Avenue. **Officer response** The Applicant confirmed that CCTV would be utilised where considered necessary. A hotel security management plan is recommended via condition.
Historic England	Responded with no comments.
Historic Royal Palaces	No response received.
Lead Local Flood Authority	Responded and recommended conditions. **Officer response:** Recommended conditions.
London Borough of Southwark	Responded with no comments.
London Borough of Tower Hamlets	Responded with no objections.
Thames Water	Responded and recommended a condition. **Officer response:** Recommended as a condition.
Transport for London	Initial comments addressed by applicant, and confirmed no objections.
Neighbour responses	
Gilbert House, Pimlico, London SW1V 3HW	Object to the demolition of this building both on aesthetic grounds and on environmental grounds. A modernist post-war building should have protection.

(objection)	Environmental impacts of demolishing existing large buildings and replacing with newly created materials; concrete, glass metal etc.; refitting buildings creates as much work for the labour force, and not at the expense of the environment. Resources should not be wasted. **Officer response:** Addressed in 'Design and Heritage' section and 'Sustainability' section.
Submitted on behalf of 27 Minories, EC3N 1DE – submitted from Stockport, SK6 5PQ **(neutral)**	Queried why only consulted in the re-consultation; the residents at 27 Minories would have appreciated more notice and would like to know what impact this development will have to the sewers in the vicinity. **Officer response:** The Addresses were included in the two consultation periods. Regarding sewer impact, the Applicant has confirmed that a pre-planning enquiry was submitted to Thames Water regarding the impact of the development on the sewers in the vicinity and Thames Water have confirmed there is sufficient capacity in the combined sewer network. The Applicant confirmed that, in regards to the surface water discharge, Thames Water require that flows are restricted to a total of 2.0l/s. The proposed design limits the discharge rates for surface water flows to 2.0l/s (including the 1 in 100-year return +40% climate change allowance) using blue roofs for attenuation. The resident has been forwarded the Applicant's response. Officers consulted Thames Water and a response was received which included confirmation that there was no objection in regard to the combined waste water network.
The Portal Trust, 31 Jewry Street **(objection)**	Development would adversely affect our rights of light owing to the proposed height of the new building. **Officer Response:** Please review the 'Daylight, sunlight and overshadowing' section of the report.

Policy Context

24. The development plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

25. 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.

26. 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.

27. 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.

28. The Corporation recently adopted the 'Preventing Suicide in High Rise Buildings and Structures' Planning Advice Note (2022) which requires safety measures to be considered and incorporated where necessary.

Considerations

Relevant Statutory Duties

29. 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); and
    - 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).

30. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features

of special architectural or historic interest which it possesses (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

National Planning Policy Framework (NPPF 2021)

31. The 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".

32. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.

33. Paragraph 10 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:

- approving development proposals that accord with an up-to-date development plan without delay; or
- 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.

34. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
- 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
- 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).

35. 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.”

36. Paragraph 111 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”.

37. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 126 advises that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

38. Paragraph 130 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and create places that are safe, inclusive and accessible and which promote health and wellbeing.

39. Paragraph 134 sets out that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

40. Chapter 14 of the NPPF relates to climate change, flooding and coastal change. Paragraph 152 identifies that the planning system should support the transition to a low carbon future. 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 the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

41. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. 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. Paragraph 197of the NPPF advises, "In determining applications, local planning authorities should take account of:

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

42. 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."

43. Paragraph 200 of the NPPF states "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:

- grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- 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."

44. 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.

45. Paragraph 203 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

46. In considering this planning application, account has been taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.

47. The principal over-arching issues in considering this application are:
    - the extent to which the proposals comply with the relevant policies of the Development Plan; and
    - the extent to which the proposals comply with Government guidance (NPPF).

48. The principal site specific issues in considering this application (in accordance with the over-arching issues above) are:

    - Loss of office floorspace;
    - Principle of development;
    - Economic considerations;
    - Design and heritage;
    - Public Realm and Trees;
    - Archaeological impacts;
    - Access and Inclusive Design;
    - Transportation and highway impacts;
    - Waste collection arrangements;
    - Environmental sustainability;
    - Environmental Impact of Proposals on Surrounding Area (daylight, sunlight, overshadowing and solar glare; light pollution; wind; thermal comfort; contaminated land; noise; and air quality);
    - Fire safety;
    - Suicide prevention measures;

- Health Impact Assessment;
- Public Sector Equalities Duty;
- Human Rights Act 1998;
- The requirement for financial contributions.

Loss of Office Floorspace

49. London Plan Policy E1 supports increases in the current office stock. Likewise, Core Strategic Policy CS1 of the Local Plan and Strategic Policy S4 of the draft City Plan seek to ensure that the City provides additional office accommodation to meet demand from long term employment growth.

50. This application would result in the loss of 5,821sqm (GIA) of existing Class E(g) office floorspace. The Proposed Development would provide 410sqm (GIA) of new Class E office floorspace.

51. Local Plan Policy DM1.1 and draft City Plan Policy OF2 seek to protect office accommodation. Policy DM1.1 seeks to prevent the loss of existing office accommodation where the building is considered suitable for long term viable office use and there are strong economic reasons why the loss would be inappropriate to include prejudicing the primary business function of the City; jeopardising the future assembly and delivery of large office development sites; removing existing stock for which there is demand in the office market or long term viable need or introducing uses that adversely affect the existing beneficial mix of commercial uses.

52. The supporting text (paragraph 3.1.8) to Local Plan Policy DM1.1 and the Office Use SPD indicate that proposals for the change from offices will normally be refused if the building or site is considered suitable for long-term viable office use. The Local Plan indicates that, exceptionally, the loss of an individual office development to other commercial uses may be acceptable where the proposed alternative use meets the wider objectives of the Local Plan.

53. Local Plan Policy DM1.2 seeks to promote the assembly and protection of large office development sites and it is considered the Proposed Development would not jeopardise the operation of nearby development.

54. Local Plan Policy DM1.3 promotes small and medium sized business units and the proposed coworking space aspires to provide floorspace for smaller businesses.

55. Local Plan Policy DM1.5 encourages a mix of commercial uses within office development which contribute to the City's economy and character and provide support services to its businesses, workers and residents. Paragraph 3.1.20 indicates that such complementary uses include retail, leisure, education and health facilities.

56. The applicant has submitted a Viability Assessment with the application.

57. The viability report has considered the potential viability of an office refurbishment, a redevelopment for offices, and a redevelopment for a mixed hotel and office scheme. The viability has been undertaken with developer profit as a fixed cost, with the viability outturn being the residual land value. This is then expressed as a residual land value per square foot of net internal area. The viability assumes a level of profit for office refurbishment at 7.5% of costs, for office redevelopment at 15% of costs and for the mixed hotel/office scheme at 10% of costs. This level of profit is considered to be reasonable for the development types considered. In terms of viability output, expressing residual land value on a per square foot basis, the office refurbishment would deliver a value of £139 per sq ft, the office redevelopment £26 per sq ft and the mixed hotel/office development £410 per sq ft. The viability report then compares these values to residual land values in comparable office schemes in and around the City, which suggest alternative office schemes being available in a range of £280 per sq ft to over £600 per sq ft. This demonstrates that refurbishment or redevelopment for office use would not generate a sufficient residual land value to incentivise the landowner to bring the site forward for continued office use; sensitivity analysis within the viability study confirms these findings.

58. The viability report demonstrates that there is alternative office space available locally at a higher specification. While it can be important to ensure office stock is maintained during periods of downturn to enable long-term growth, the viability report indicates that there is 11.5m sqft (of which 8.2m sqft is secondary) of vacant stock on the market and the vacancy rate is 12.7% which is higher than average. The viability report indicates that there is ample stock completed and in the pipeline for office developments. At the end of Q2 2021 570,200 sq ft was completed of which 151,100 sq ft was already pre-let. An additional 7.7m sq ft of proposed space has the potential to complete before the end of 2025. The viability report argues that it is unlikely that the loss of this floorspace at Boundary House would prejudice the primary business function of the city.

59. Change from offices will normally be refused if the building or site is considered to be suitable for long-term viable office use. Accompanying reports indicate that the building is currently unattractive for long term office use and does not meet current BCO standards due to low floor to ceiling heights, numerous columns within a narrow floorplate area which restrict useability, raised ground levels which do not meet accessibility requirements, an inaccessible seventh floor with no WCs, and no cycle storage or shower facilities. Following the global pandemic there is greater demand for cycling facilities and buildings with good air circulation which may decrease desirability of the building. It is stated that a sole office scheme would be a poor competitor to other buildings in better locations.

60. The loss of office floorspace on this site is considered to be minimal when considered against the existing and pipeline floorspace in the City of London, including those schemes which this Committee has resolved to permit but which have not progressed yet to full permission. Whilst the Local Plan resists the loss of office floorspace, the scale of the loss on this site would not prejudice the overall supply of office space in the City, nor prejudice the potential for future site amalgamation or result in the loss of existing stock for which there is demand or longer-term viable need.

61. To conclude, although continued office use might be feasible in the short term, the viability assessment demonstrates that in the longer term this is unlikely to be a viable proposition and that alternative uses should be considered.

62. On balance, therefore, whilst there would be a loss of existing office floorspace, this would not have an adverse impact on the overall stock of floorspace in the City or prejudice the City's role as an international business and professional centre. The high quality hotel accommodation and community spaces will contribute towards diversifying the City's building stock and land uses, adding vibrancy and activity for seven days per week and contribute to the achievement of the City Corporation's Destination City ambitions and align with the City Corporation's wider ambitions for a post-Covid City.

63. The loss of office accommodation is therefore considered to be acceptable within the provisions of Local Plan policies CS1 and DM1.1 and emerging policy in the draft City Plan.

Principle of Development

64. The application aims to provide a mix of uses including hospitality, office, cultural and community facilities and the demolition of the existing office building.

Hotel use

65. The site is within the Central Activities Zone (CAZ). London Plan Policy SD4 states that the strategic functions of the CAZ includes tourism and hotels.

66. London Plan Policy E10 states that London's visitor economy should be enhanced thorough visitor experience and supporting infrastructure, and that a sufficient supply and range of serviced accommodation should be maintained. The Policy states that smaller scale provision should be promoted in the CAZ except wholly residential streets or predominantly residential neighbourhoods and subject to impact on office space and other strategic functions. It states that the intensification of the provision of serviced accommodation should be resisted where this compromises local amenity or the balance of local land uses. The policy also requires accessible bedroom provision. The supporting text of Policy E10 states that it is estimated that 58,000 additional bedrooms will be required in London by 2041.

67. The Site is within a Business Improvement district (Aldgate Connect) which is a defined area in which a levy is charged to all business rate payers in addition to the business rates to develop projects that will benefit businesses in the local area.

68. Local Plan Policy CS11 seeks to promote the City's cultural, and visitor offer by allowing hotels where they support the primary business or cultural role of the City and refusing new hotels where they compromise the City's business function or the potential for future business growth. Local Plan Policy DM 11.3 states that new hotel and apart-hotel accommodation will be permitted if it does not prejudice the primary business function of the City; would contribute to the balance and mix of uses in the immediate locality; does not result in adverse impacts on the amenity of neighbouring occupiers; provides at least 10% wheelchair-accessible hotel rooms; and ensures satisfactory arrangements for pick-up/drop-off and servicing.

69. Similarly, Draft Policy S6 of the emerging City plan states that hotel development which supports but does not compromise the primary business or cultural role of the City will be permitted. Draft City Plan

Policy CV3 further states that proposals for hotels and other visitor accommodation will be permitted where they do not result in the loss of viable office space; do not result in adverse impacts on the amenity of neighbouring occupiers; would include a range of complimentary facilities; would provide satisfactory pick-up and drop-off services; would be accessible; would ensure a continuing beneficial use for historic buildings; and would address sustainability challenges in line with the BREEAM guidance.

70. The proposed hotel is designed to provide 10% wheelchair accessible rooms in line with policy requirements and step-free access throughout. The accompanying Transport Statement indicates that satisfactory arrangements for pick-up/drop-off and service delivery vehicles have been made and the proposed development would not adversely impact the nearby street network, which is addressed in detail in the 'Transport' section of the report. In addition, it has been established through accompanying reports that the proposed hotel will not cause any unacceptable adverse impacts to the amenity of the neighbouring occupiers, although there would be an impact on the existing levels of daylight and sunlight available to some nearby properties which is addressed further below.

71. Furthermore, the proposal would support the primary business function and cultural role of the City, and would not compromise the potential for future business growth. As set out in the text above, it is not considered that the hotel will result in the loss of viable office space. The hotel will provide a range of complimentary facilities including an ancillary ground floor café area and a rooftop restaurant, in addition to a small provision of office space, and would contribute to the City's ambitions for Destination City and post-Covid recovery.

72. Finally, the proposed hotel will contribute to the balance and mix of uses in the immediate locality, which is comprised of commercial, educational, residential and student residential uses.

73. A condition is recommended for the provision of a final Operational Management Plan to minimise impacts to amenities of neighbouring uses.

74. Therefore the proposals are considered to comply with London Plan policies SD4 and E10, Local Plan policies CS11 and DM11.3, and draft City Plan policies S6 and CV3.

Office floorspace with ancillary community and cultural uses

75. The applicant is proposing 456 sqm (GEA) of office floorspace (Use Class E) with 330sqm usable workspace on part ground and part first floors which is presented as a bespoke co-working and "multi-modal space" which would include: meeting rooms and breakout spaces, podcast studios, and event and studio spaces. The Applicant is proposing a unique boutique offer for co-working and cultural activities as opposed to a typical co-working space.

76. As outlined in the text above, office floorspace is supported by Policy.

77. In terms of community facilities, Local Plan Policy CS22 seeks to maximise opportunities for local communities within the City. Policy S1 of the emerging City plan seeks to protect and enhance community facilities whilst Draft Policy HL5 seeks to deliver flexible multi-use spaces within the City. All the above-mentioned policies recognise the need to provide community facilities to complement the City's commercial offer and support the wider objectives of the plan.

78. Local Plan policies CS11 and draft City Plan Policy S6 encourages new cultural experiences in accordance with the City Corporation's Visitor Strategy. A Cultural and Community Strategy has been submitted in accordance with draft Policy S6.

79. The Cultural and Community Strategy outlines the proposal for a cultural and community hub with an event space on the ground floor and studio space on the first floor which could be used for a wide range of uses. In addition, the proposed scheme would make provision for a publicly accessible café/bar and a rooftop restaurant along with public realm areas around the building by creating a 'social edge' through active frontage to Jewry Street and Carlisle Avenue and enhancement of Rangoon Street.

80. The Applicant aims to support local groups and culture by proposing the following uses for the office space, to be secured via Section 106 Agreement:
    - 10 hours a month of free community use of meeting rooms;
    - 10 hours a month free meeting room hire for nearby education uses (daytime);
    - 10 hours a month of 50% discount rate to hire the podcast studio for local community groups;
    - Podcast studio rental at £35 per hour (RPI);

- One free hire per month of event space for community groups.

81. The proposed development will deliver co-working, cultural and community facilities alongside a hotel. This means that there is not a complete loss of office space, and the proposed scheme partially compensates by re-providing new flexible and adaptable co-working space. Though the proposal offsets the loss of office floorspace to some extent, the quantum of space is not considered large enough to function as a typical co-working space.

82. Officers have raised concerns that the co-working space is small when compared with similar co-working space offers and the applicant has provided supplementary responses to support the functionality and viability of the space.

83. In addition, the Applicant has proposed that the community offer will be managed by the hotel manager and workspace operator. Further information provided by the Applicant outlines the process of setting up a management agreement with an operator responsible for staffing, managing and marketing the space along with a rate card for potential hiring options.

84. An obligation is recommended for the submission of a Cultural Implementation Strategy which details the dedicated occupier and management plan for the co-working, community and cultural spaces, prior to the occupation of the hotel. This would include details of operator(s), management, final spatial layouts, the activation of windows at ground floor and final programme to be shaped by future needs, users and the market. In addition, annual reporting for the cultural and community space would be required.

85. In addition, to ensure this space is protected, a planning obligation is recommended for the space to be provided as affordable workspace or community space if an occupier for the co-working space is not confirmed.

86. The proposal would enable the City's communities to access a range of experiences, in accordance with the City Corporation's Visitor Strategy. Subject to planning obligations, the co-working, community and cultural provision complies with Local Plan Policy CS22, CS11, and draft City Plan policies S1, S6 and HL5.

Economic Considerations

87. In addition to the attraction of visitors to the City and complementary facilities for the non-hotel guests to access, the Applicant estimates 90 full-time roles will be created for the development. The co-working space will also maintain a mix of economic growth at the site.

88. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.

89. 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 pre-Covid.

90. 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.

91. 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.

92. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. 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.

93. 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 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.

Design and Heritage

The existing site

94. The Boundary House site has an 'L'- shape corner plan which is bound by Carlisle Avenue, Jewry Street and Rangoon Street. Ground floor is raised above pavement level on a sloping site north to south.

95. The site was bomb damaged and rebuilt after the Second World War in its current form which consists of a series of blocks of varying heights where massing steps down from eight storeys (41m) on Carlisle Avenue to six storeys on Jewry Street (31m). The building is not considered to be of significant architectural or historic interest and it is not considered to contribute to the character of the street. The inactive ground floor frontages, large spandrel and glass cladding are not considered to positively contribute to the local townscape views. Overall, the building's contribution to the townscape is considered to be at best neutral.

Height, Form, Massing and Bulk

96. The majority of buildings in the surrounding area are between 6 – 15 storeys in height, reflecting the mixed character of this area which is in a transition zone between the tall buildings of the City Cluster and the City fringe to the east. The surrounding context includes the following buildings of comparable height with 80 Fenchurch Street to the north-west measuring 77.7m and 35-37 Vine Street measures 60m (14 storeys). The application proposes a 14-storey building measuring

64m. By definition in the extant and emerging Development Plan, the proposal is not a tall building.

97. The surrounding streets of Crutched Friars, Northumberland Alley, Carlisle Avenue, Lloyds Avenue and Vine Street are distinctly quieter and more intimate, generally consisting of a denser collection of and smaller urban grain of buildings, narrow alleyways and streets which are less trafficked compared to the busier main streets of Minories and Fenchurch Street with their larger building plots and higher footfall. The proposed development would increase the massing on Jewry street to become commensurate with the buildings in the 'foothills' of the Eastern cluster; 80 Fenchurch Street and Jardine house. The proposal would embolden its presence on Jewry with a sweeping curved façade which follows the curve of the street. The massing would step down at the rear of the site, creating a more human scale building, appropriate to the quieter character of Carlisle Avenue.

98. The two parts of the 'L'- shape plan of the existing Boundary House site have been developed to different heights and with different characters which also reflect the different uses proposed within. The north-south block onto Jewry Street would comprise the main elevation with architectural arched colonnade, main entrances and active frontages expressed on the elevation. By comparison the east-west block would be more domestic in scale, plainer but brighter in materiality and present itself as a secondary elevation. The two characters would be distinct enough to appear as two separate buildings, thus giving the impression of a finer urban grain.

99. The north-south block would house the majority of the hotel bedrooms on which the primary elevation would front Jewry Street. This would increase the massing on to Jewry Street by eight storeys effecting the local townscape. In views looking north up Jewry Street, the roof line would step up steeply behind Friary Court to reveal the defining corner pivot of the whole ensemble, appropriately defining the junction of Jewry and Rangoon Street. However, the architectural detailing, the planting on the roof terrace and the chamfered corner will make a distinctive and visually interesting roof line in long views. Moving up Jewry Street towards Aldgate, the curvature of the façade would emphasise the curving nature of the street. From India Street the proposed development would terminate the view; the proposed height of the building would completely obscure 80 Fenchurch and would create an imposing presence. However, the proposed seating and greening at the base would create an inviting vista and would enhance the townscape. In views looking south from Jewry Street towards

Crutched Friars, the proposed massing would be seen to sharply rise above the roofline of 5 Jewry Street revealing a blind façade and a small roof terrace. However, the scooped-out arches and cornice at ground level would continue the horizontal banding of 5 Jewry Street and the upper cornice would visually connect with the building height datum. The massing of the upper levels would be slightly set back from the front elevation and the chamfered corner would create a vertical marker on the skyline and would mimic and complement the rounded corner of 35-37 Vine Street which serves as an architectural feature. In views further north from Aldgate Square, the proposed development would be visible in long views rising behind 1 Aldgate in the background and narrow the sky gap of Jewry Street. The proposed development would be commensurate with the height of 1 Aldgate and the shallow stepped profile would be architecturally coherent with the stepped profile of the upper storeys of 1 Aldgate in the view.

100. The massing of the East-West block, which would contain the co-working space, would be distinctly lower on Carlisle Avenue, rising to eight storeys at 39.39m. This would be visible in views looking East along Carlisle Avenue and would be considered a positive contextual response to the lower height of neighbouring building, Friary court, which rises to six storeys. The lower height would maintain the building roof line and contribute to maintaining good levels of daylight amenity to the public realm and neighbouring buildings on Carlisle Avenue which has pedestrian links to Fenchurch Street and Lloyds Avenue

Building Design, Materials and lighting

101. The North-South block is designed to traditional proportions of base, body and attic storeys similar to that of the historic buildings at the North end of Jewry Street. The use of double height GRC (Glass reinforced concrete) arching bays would create a sense of weight and solidity, grounding the building to the street. The proposed building would be well detailed, adding to the richness of architectural variety along Jewry street and the neighbouring character of Lloyds Avenue Conservation Area. The body of the proposed building would be made up of two storey sections of recessed windows, framed with dark bronze metal and matching spandrel panels separated by horizontal light-coloured brick banding. Light-coloured brick columns would vertically define the windows bays and the contrasting metallic chestnut-brown glazed brick reveals would create a strong vertical emphasis in oblique views in the Townscape. The column reveals would evolve to 'fins' which would rise to form a crown at attic and roof levels and become a defining architectural feature of the building. The upper cornice would delineate the body from the attic storeys and

where the building line would step back. There would be several layers of 'fins' at the upper levels and integrate into the design of roof-level balustrades, which would protrude and cast shadows on the light brick columns and repeat at recessed roof levels. The attic stories would be finished in a dark metal and would appear recessive. The darker colours, the shadows and finer detailing at these upper levels would give the illusion of tapering columns widths and diminishing proportions thus reinforcing the sense of hierarchy of the building. The rooftop plant and balustrade are integrated into the design of the roof and the greenery visible at roof and ground level would soften the edges of the building and add visual interest.

102. At ground on Jewry Street, the proposed series of grand GRC fluted arches would frame glazed bays of the upper ground floor, also finished in dark metal. Below the arches, the building line would carve out under the building to increase the size of the pavement and reveal a curved soffit. The retention of the existing ground and basement structure would maintain the floor slab level which is higher than pavement grade and would result in the need for a stepped entrance. The proposed steps, accessible lift, bleacher seating and planters would wrap round the base of the building and nestle underneath the arches and is designed as a coherent set piece. This would create a high quality and tactile ground floor experience where it would be possible to appreciate tactility and planting up close and which would encourage building users and passers-by to enjoy the public realm and activate the street. The northern entrance would be made up of large glazed walls which would increase the visibility, animation and interest on Jewry Street and Carlisle Avenue.

103. The East-west block would use the same brick finishes but inverse the application with the light-coloured brick in the window reveals and the chestnut brown glazed brick to face the elevation. The glazed brick would be brought right to ground on the elevation along Carlisle Avenue and would be used to frame the square bays of the ground floor in lieu of the GRC arches. The glazed brick would be repeated on the blind wall of the arched entrance into Carlisle Avenue to draw people through the arch. This would create an altogether different character to the North South block, which would be bolder, more modern and industrial in style. The brickwork curved corners, grout colour and finishing of the glazed brick detailing would be secured via condition but is considered vital to the overall quality of this elevation.

104. The ratio of window to solid surfaces would sit well within the context of historic buildings and would also improve the activation at street

level. The expressed hierarchy of the base body and attic would help to break up the massing of the proposed development and would integrate with existing building datums. The predominate use of masonry and warm tones of the proposed materials on the elevations and roof is considered sensitive to the setting of the listed building and a positive contextual response to the materiality of the buildings on Jewry Street.

105. A lighting design strategy for the roof terraces and ground floor entrances will be agreed with Officers and secured by condition and submitted prior to occupation in order to avoid glare and light spill.

Public Realm and Trees

106. The existing public realm surrounding the site is void of greenery but has a distinctly quieter and intimate character which contrasts to the busy roads of Fenchurch to the south-west, Aldgate High Street to the north and Minories to the east. Carlisle Avenue is a narrow road with narrow footways and connects into two pedestrian alleyways into the Lloyds Avenue Conservation Area at the junction with Northumberland Alley. Rangoon street borders the south of the site and exists as a short dead end servicing road serving both Boundary House and Friary Court buildings. The front elevation fronts on to Jewry Street where building line steps in awkwardly and does not align with the curvature of the street. The current massing of Boundary House straddles over Carlisle Avenue at the junction with Jewry Street and creates a dark and uninviting gateway experience into Carlisle Avenue.

107. The proposals seek to improve the buildings relationship with the public realm on with Jewry Street, Carlisle Avenue and Rangoon Street. On Jewry Street, the building line would be reformed to follow the curvature of the street. The ground floor would be set back farther than the existing building line and public seating and planted pockets of greenery would face outwards to Jewry Street, creating an inviting space to sit and add to the animation of the street. This would be complemented by the northern entrance to the building and dining facilitates proposed on the upper ground floor where tables and chairs would look out of large glazed bays which improve the potential for natural surveillance onto the public realm.

108. At the south pinnacle of the building on the corner of Jewry Street and Rangoon Street, the proposed raised entrance would combine a sweep of steps and public bleacher seating interspersed with more greenery to create a south-facing dwell space which would benefit from lunchtime sunshine. The proposals to relocate the servicing bay to

Carlisle Avenue would reduce the amount of traffic in this location, making it safer to be used for building users and passers-by to enjoy. The new planters which have recently been installed outside the Urbanest building are in close proximity to the Rangoon Street entrance. The bleacher steps would improve the sense of place and arrival at this location but it would also create the opportunity for Rangoon Street to improve further and become a dwell space for the public.

Design Conclusion

109. The proposal would respond to the contextual height and massing of the site, is well designed and would use materials which would be coherent with the Townscape and which would be high quality. The proposed public seating proposed at entrances and in the façade treatment would enhance the quality of the pedestrian experience of the public realm, creating a space for enjoyment which is inclusive. The pavements in the public would become more generous and the materials would match exiting, would be durable and easy to maintain. A planning obligation would be sought for the developer to contribute to tree planting in the local area which would consider urban greening proposals in the vicinity of the development.

110. The creation of active frontages along both Jewry Street and Carlisle Avenue are welcome as this area of the City currently has limited activation at street level. If planning permission is granted, it is recommended that a condition be imposed to maximise and retain active frontages at ground floor level, especially due to the lack of level access.

111. The final details of the development including greening, external seating and planters, window and door details, lighting, soffits, fins, entrances, and materials proposed for elevations would be secured via condition to ensure a high-quality appearance and finish in the final construction.

112. The final details of the public realm including planting, materials, lighting, and management would be subject to conditions, planning obligations and the Section 278 agreement. The improvements to the public realm represent good place making and there would be gains quantitively and qualitatively compliant with the NPPF design policies, London Plan policies, Local Plan policies, Draft City Plan policies, and the City Public Realm SPD.

113. The proposals comply Local Plan Policies CS10 and DM10.1, DM19.1 emerging City Plan Policy S8, DE2, HL1, DE3, and London Plan Policy D3 and D8, paragraphs 130 and 132 of the NPPF and the City Public Realm SPD.

Strategic views – London View Management Framework

114. Local Plan 2015 Policy CS13 seeks to protect and enhance significant City and London views of important buildings, townscape and skylines. It seeks to implement the Mayor's LVMF SPG, protect and enhance views of historic City landmarks and secure an appropriate setting and backdrop to the Tower of London. Policy S13 of draft City Plan 2036 seeks similar and takes into account of the Tower of London World Heritage Site Management Plan (2016).

115. A Townscape, Visual and Built Heritage Assessment has been prepared and submitted as part of the application.

Indirect impacts on the setting of designated heritage assets
OUV and Relationship to Setting

116. The seven overarching attributes of Outstanding Universal Value which are contained in the Statement of Outstanding Universal Value, itself contained in the World Heritage Site (WHS) Management Plan, have underpinned this assessment, alongside the components contributing to each attribute. It is considered that three attributes are of particular relevance to assessing the impact of the proposal: i.) an internationally famous monument ii.) landmark siting and iii.) physical dominance of the White Tower.

117. The WHS Management Plan establishes a 'local setting area', an 'immediate setting' and a non-spatially defined 'wider setting'. The proposal is not in the designated local setting (as identified in Figure 4 of the WHS Management Plan) but is in the wider setting. The Local Setting Study (section 7) identifies the main views and/or viewpoints to and from the Tower of London (ToL) which are deemed to exemplify the OUV and the components, with management guidance providing a baseline for assessing change. The representative views/viewpoints include a number of LVMF viewing locations.

- Whilst being proportionate, the assessment uses the assessment framework in the Mayor's 'London's World Heritage Sites: Guidance on setting' SPG, which is based on the relevant ICOMOS guidance, including the impact tables at Appendix 3 and 4, in conclusion.

- The proposal would have an in-direct impact, via change in the wider setting of the WHS. Change is not necessarily harmful. That change will be apparent in a number of views including those from the Queen's Walk, around City Hall and Potters Field.

Impact on OUV/Significance:

118. The proposed development would not be visible in Local Setting Study Representative Views from within the Tower of London or from outside looking towards the World Heritage Site (WHS). The impact on the OUV is undertaken in the assessment under consideration of the impact of the LVMF view below

LVMF View 25A.1-3 – Townscape - Queen's Walk to the Tower of London

119. The site lies within the Townscape view from Queens walk and is visible and between Assessment Points 25A.1-3. This view is identified in the Tower of London WHS Management Plan (7.3.22) as the most iconic view of the Tower. The focus of this view is the Tower, the identified Strategically Important Landmark, in this 'iconic' view, deemed to best represent its Outstanding Universal Value (OUV). The view includes other identified landmarks the Monument, visible upstream and Tower Bridge, visible downstream. The silhouette of the Port of London Authority is distinctive and marks an important transition between the City and the Liberties, the defensive open space around the Tower. The juxtaposition of the modern cluster of towers including Tower 42, the Heron Tower and 30 St Mary Axe (aka the Gherkin), which are other landmarks identified in the LVMF, reflect the 900 years of history and this is considered a central characteristic of this view.

120. 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.

121. The visual management guidance also states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (paragraph 186). The visual management guidance anticipates the consolidation of the Cluster which it is deemed will add considerably to the character and stature of the view, and that any new skyline buildings must account for how they relate to skyline features (paragraph 187).

122. The site is located 350m north west of the Tower of London World Heritage and would maintain t Site and would not impact on the

Protected Vista from 25A.1 or the dynamic Protected Silhouette between Assessment Points 25A.1-3.

123. The rooftop of southern façade of the proposed development would be visible west of and below 1 America square and in the setting of the Port of London Authority (PLA) (Grade II* listed). The southern end of the façade is one of the development's narrow elevations and the proposed building's orientation would minimise the scale of change the building would make in this view. The dark metal and warm tones of the proposed materials would appear recessive and this would be further softened by the greenery proposed at terrace and roof level. The height of the proposed development would be significantly lower than the former PLA building, maintaining the sky gap around the building and thus preserving silhouette of the landmark on the skyline. Most of the proposed building would be obscured by other middle ground buildings of similar building height as well as the tree canopy in the foreground.

124. The limited extent of proposed building which would be perceived and at that distance away from the viewing assessment point would mean the proposed building would be barely visible. The height and massing would sit in line with the layers of buildings in the 'foothills' of the City cluster, the proposed dark and muted colours of the proposed materials would appear recessive, further dissolving the buildings presence in the wider setting of the ToL. The juxtaposed character and separate nature of the City Cluster and the Tower would be maintained, as would the prominence of the White Tower in the view and the river in the foreground. The he viewer's ability to appreciate the Outstanding Universal would be preserved as would the ability to appreciate and recognise the landmarks identified in the view in the LVMF.

125. The proposed development would not harm the characteristics and composition of strategic view or its landmark elements, preserving the ability of the observer to recognise and appreciate the Strategically Important Landmark, the Tower of London, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LMVF SPG and Protected Views SPD

<u>Conclusion – Impact on Tower of London World Heritage Site</u>

126. The proposal would preserve the ability to recognise and appreciate the ToL as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF as it relates

to OUV. The extent of change the proposed development would have on the wider setting would be negligible, the impact on the ability to appreciate the site's OUV would be neutral and it would not harm the significance of the Tower of London whether in relation to the WHS, the individual listed buildings, or the Scheduled Monument. The proposals would accord with Local Plan policies CS13, emerging Local Plan policies S11, London Plan Policies HC2, HC3, HC4

Impact on Listed buildings
David Game College (Grade II Listed)

Significance and Contribution of Setting:

127. The building's architectural and historic significance can be summarised by its association with the Sir John Cass foundation, founded in 1748 by politician and businessman Sir John Cass, now known as the Portal Trust whose purpose was to provide educational opportunities for disadvantaged young people in London and is one of the most recognised and prestigious educational foundations in the UK. The building was opened in 1902 as the Sir John Cass Institute by Architect A.W. Cooksey as a handsome red brick and portland stone, three storey building with an arched entrance and a domed square turret and glazed brown bricks at the base.

128. The elements of of setting which contribute to the significance of the David Game College are the group value with the historic buildings on the east side at the north end of Jewry Street which can be seen in conjunction with the principle façade of the listed building. These are also rich in elegant ornamentation, window openings and have a historic small historic urban grain which makes up a historic townscape and gives the listed building prominence as an important philanthropic institution in local views. The low rise of buildings at the north end of Jewry street give visual prominence to the varied attic storeys and roof line including the domed tower of the David Game College and also affords good daylight into the classrooms and leisure spaces via its lightwells large windows.

Impact:

129. In the view from Crutched Friars looking north, the proposed development would rise substantially higher than the listed building and the historic buildings to the north which would slightly obscure the view of the David Game college and erode the listed building's presence in the street by a small degree but would not impact on the historic character of the buildings on the east side which contribute to the significance of the listed building.

130. The materials and colour palette proposed on the Jewry street elevation would be coherent the warm terracotta tones of the proposed matte and glazed brick which would enhance the materiality of the listed building in the Townscape. Overall the proposed development would not impact the historic significance or harm the architectural significance and setting of the listed building.

St Botolph's Church (Grade I Listed)

131. Re-built by renowned period architect George Dance the Elder, 1741-44, on the site of an important earlier Medieval church, it is strategically located outside the Roman/Medieval wall on a principal arrival to the City from the east. Of patinated stock brick with red brick trimmings and spartan Portland Stone dressings it displays a polite, severe Palladian classical style which is orientated, contrary to the Medieval manner, on a north-south axis terminating the view from Minories. A galleried nave with aisles sits either side the principal composition addressing Aldgate High Street/Minories, comprising a tall square pedimented tower with quoins, octagonal clock stage and lead-clad spire conspiring to create a prominent local landmark. It is of high architectural, artistic, historic and archaeological significance as an important work of a noted architect with (principally internal) features of artistic interest and some archaeological interest in those surviving parts of the earlier Medieval church

132. The setting of the Church contributes less to an appreciation of significance, which is more derived from tangible historic fabric and physical integrity. The setting of the Church has changed substantially over time, particularly in the later 20th Century. Once 'hemmed in' and enclosed as part of a finer grain by development on Houndsditch/Aldgate High Street, it was until recently rather exposed adrift a traffic gyratory. It now has an broader, open setting, backdropped by much taller and larger late 20th Century commercial blocks, with the emerging City Cluster of tall buildings to the west. The churchyard contains a greener and more intimate and quieter character which is distinct from the open public nature of Aldgate Square and creates a buffer from the heavily trafficked Aldgate Highstreet and St Botolph's street. The primary elevation faces south and the low level of the buildings on Minories and the width of the street give the setting for the Church to terminate the view looking north on Minories Overall, the openness and prominence of the Church, in particular on its original north-south axis when viewed from Minories, and to a lesser degree Aldgate High Street, make a moderate contribution to significance and an appreciation of significance.

Impact Assessment:

133. The main contributor to significance, the approach along Minories which allows an appreciation of the principal composition, would remain, unaffected. In views looking south from the junction of Houndsditch and St Botolph street, the northern corner, blind flank wall attic storeys and roof of the proposed development would be seen in the background with the rear of the church in the foreground. The background in this view is comprised of a variety of taller buildings increasing in height towards the Eastern Cluster, including 80 Fenchurch Street. The massing would appear to the same height as of One Aldgate and the warm tones of the proposed brick and metal finishes would be visually coherent with the pink/brown granite cladding of One Aldgate. This would not enhance the setting of the Church but it would not impact on the contributions made by the positive attributes of the setting of the listed building outlined above

10 Trinity Square (former Port of London Authority Headquarters) (grade II*)
Special Interest / Significance, including contribution of Setting:

134. The historic and architectural significance of the building can be summarised by:
    - Its' design by noted architect Sir Edwin Cooper as the HQ of the Port of London Authority (PLA) in Portland Stone comprising a whole urban block completed in 1922. It was opened by Prime Minster David Lloyd-George, reflecting the strategic importance to the Nation of the PLA, who oversaw then the world's busiest port. The architecture comprises a monumental Beaux Arts classical idiom with maritime allegorical sculpture, including the centre-piece landmark tower with giant niche containing a representation of Father Thames triumphant, symbolically pointing towards the mouth of the River. It has a rich interior and hierarchy of spaces including original panelled corridors, board and chairmen's offices, amongst others.
    - It has group value with Trinity House (grade I) located opposite, the HQ of the authority (by the same name) for lighthouses and navigation at sea, in a complementary Portland Stone Neo-Classical guise. Both enclose and define the semi-formal Trinity Square Gardens, laid out originally in 1795, symbolically containing the Mercantile Marine WWI Memorial by Sir Edwin Lutyens (grade I) and the post-WWII Merchant Seamen Memorial by Edward Maufe (grade II*). All together, these form a harmonious composition, of shared architectural language, comprising a dedicated mercantile ensemble or group of semi-formal character in the English

Picturesque tradition, of which 10 Trinity Square is the defining centrepiece. This immediate setting is the principal element of setting which contributes to its significance. The tower element, when built one of the tallest in London, has a wider riparian setting where it is prominent alongside a series of monuments when viewed from the south bank (Queen's Walk) and the Upper Pool of London. This also makes an important, but secondary contribution to significance and an appreciation of significance.

Impact:

135. The impact of the proposed development would be to the tower element which can be identified on the skyline from Queens Walk on the Southbank. The small portion of the upper storeys of the proposed development would be barely visible in the sky gap between the tower of the PLA and 1 America Square owing to the muted tones and slender profile of the proposed development. The height of proposed development would be consistent with the descending roofline which to the East of the PLA and therefore would preserve the prominence of the PLA's tower and the ability to view it in conjunction with other landmarks in Riparian Views. The proposals would not harm the historic or architectural significance of the building.

Setting of Conservation Areas

136. Policy CS12 of the Local Plan seeks to preserve and enhance the character and appearance of the City's Conservation Areas. The Lloyd's Avenue and Fenchurch Street Station Conservation Areas are located to the southwest of the development site. The proposed development does not adjoin or lie within a Conservation Area boundary nor does it appear in any of the identified views within the Conservation Area appraisals. The proposal is not visible from the Fenchurch Street Station Conservation Area and therefore has no impact on the character and appearance. The proposals would just be visible in the background from the south east end of the Conservation area at the junction of Lloyds Avenue and Crutched Friars in a view looking north. The Conservation Area buildings in the foreground of this view make a neutral contribution to the character and appearance and their contribution is not diminished by the part of the proposed building which would be seen here and therefore the impact is acceptable.

Heritage Conclusion

137. The proposals are considered to accord with Local Plan Policies CS 12 and DM 12.1, emerging City Plan policies S11 and HE1, London Plan Policy HC1, S66 (1) Planning (Listed Buildings and Conservation

Areas) Act 1990 and the relevant NPPF paragraphs 194-208. It is considered that the proposal would preserve the special architectural and historic interest and heritage significance and contribution made by the setting of: Church of St Botolph or the David Game College. There would be no harm to the significance of the Lloyds Avenue Conservation Area. Overall, the proposal would comply with Local Plan Policies CS 12, DM 12.1, emerging City Plan policies S11 and, London Plan Policy HC1.

Archaeology

138. Policy DM12.4 of the Local Plan 2015 and policy HE2 of the draft City Plan 2036 outline the requirements with regards archaeology, outlining that the City will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking inclusive access to, public display and interpretation where appropriate.

139. The site is in an area of archaeological potential situated to the west of the Roman and medieval City Wall. There is high potential for Roman remains such as deep cut ditches and pits, medium potential for post-medieval remains such as pits and earlier building foundations to survive. An Archaeological Desk Based Assessment and Written Scheme of Investigation for Archaeological Evaluation have been submitted with the application.

140. The extent of archaeological survival is considered to have been affected by the construction of the existing building basement which covers the site with the exception of an area on the south side, and foundations. The areas of potential survival are below the basement and an area outside the basement footprint. Archaeological evaluation is appropriate to provide additional information on the presence, depth and character of archaeological remains and to inform an appropriate mitigation strategy.

141. The proposed development would include extension of the basement beneath the building and, on the south side, outside the existing basement, lowering of the southern and central part of the basement, strengthening of the basement floor to accommodate new structural columns and new piled foundations. There is potential for remains from all periods to survive below, and outside the existing basement, which would be affected by construction of the proposed basement extension and new foundations.

142. The proposals are acceptable in archaeological terms subject to conditions to cover archaeological evaluation, a programme of archaeological work and foundation design.

143. The application therefore complies with Local Plan Policy DM12.4 and draft City Plan Policy HE2.

Access and Inclusive Design

144. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan and Policy D5 of the London Plan. In addition, the Local Plan Policy DM11.3, draft City Plan Policy CV3 and Policy E10 of the London Plan require hotels to deliver high accessibility standards.

145. The application is supported by a Design and Access Statement and supplementary material. Detailed consideration has been given to access issues in the design of the scheme. In line with policy, 10% of bedrooms are proposed as wheelchair-accessible, and step-free access would be provided throughout the building.

146. The existing ground level is approximately 1.5 metres above street level and due to the proposed part retention of the existing basement and ground floor, this will remain the same in the proposed scheme. Although there would not be level access from street level, this has been balanced with the need to meet wider sustainability aims therefore is considered acceptable in this case. Platform lifts are proposed next to both of the entrance stairs therefore step-free access would be achieved.

147. The City's Access Officer has reviewed the proposals. Further details would be required through recommended conditions to ensure the facilities meet the accessibility requirements.

148. Therefore, subject to conditions, the development complies with policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2036 and Policy D5 of the London Plan. In addition, the proposals comply with the relevant parts (accessibility) of Local Plan Policy DM11.3, draft City Plan Policy CV3 and Policy E10 of the London Plan.

Transportation and Highways

Public Transport and principle of development

149. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B. The site is located within short walking distance of Fenchurch Street rail Station and within a 10 minute walk of Liverpool Street Station rail and underground services. Tower Hill and Aldgate underground stations are also within close proximity to the site. A number of bus routes run close by on Fenchurch Street and Aldgate High Street. Accordingly, the site is considered suitable in principle for the proposed type and scale of development.

Cycle parking

150. London Plan Policy T5 (Cycling) requires cycle parking be provided at least in accordance with the minimum requirements set out within the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.

151. The level of cycle parking proposed as part of the development is compliant with the London Plan requirement, shown in the table below.

Table 5: Cycle Parking standards

London Plan long stay cycle parking requirements	Proposed long stay cycle parking	London Plan short stay cycle parking requirements	Proposed short stay cycle parking
20	21	8	8

152. The long stay cycle parking is proposed at basement level with access available via a lift from the staff entrance lobby on Carlisle Avenue. The lift is sufficient in size to accommodate more than one bike without the need for them to be lifted up and down. Twenty spaces would be provided in the form of Sheffield stands which would be easily accessible and would ensure the storage is attractive and easy to use for all potential users of this facility.

153. One adapted cycle space is proposed which would be located within the basement cycle storage area (in line with the London Plan Policy T5 (Cycling), London Cycling Design Standards 8.2.1, and the draft City Plan 2036 6.3.24). The proposed adapted cycle space is shown to be positioned opposite the entrance door to the adjacent shower facilities and this appears overly constrained. A condition is recommended to secure a revised cycle parking layout which ensures

that improved circulation and access for users is achieved within this area.

154. The proposals include five showers, and 42 lockers, which complement the cycle parking provision and would be directly accessible from the cycle storage area. London Plan Policy 10.5.7 recommends a minimum of 2 lockers per 3 long-stay spaces, and at least 1 shower per 10 long-stay spaces. Accordingly, the proposals are in compliance with these recommendations.

155. Eight short-stay spaces (four Sheffield Stands) are proposed within newly recessed areas on the Carlisle Avenue frontage of the site. These will be positioned away from the existing areas of Public Highway on this frontage and would ensure compliance with London Plan standards for the levels of floorspace proposed.

156. The applicant would be responsible for promoting the use of the cycle parking spaces and as such will be required through a Section 106 obligation 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 the London Plan Policy T4.

Servicing and deliveries

157. Policy DM16.5 of the Local Plan states developments should be designed to allow for on-site servicing. London Plan Policy T7 G and draft City Plan 2036 Policy VT2 – 1 requires development proposals to provide adequate space off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.

158. As existing, all servicing for the site takes place from the Rangoon Street carriageway, which is a short cul-de sac accessed from Crutched Friars. The geometry of Rangoon Street is such that that there is insufficient space for larger vehicles (greater than 8m in length) to safely turn within this area in order to access from and egress onto Crutched Friars in a forward gear. The impact of this is that larger servicing vehicles are currently required to reverse into Rangoon Street from Crutched Friars for a distance of circa 20 metres. This arrangement is highly undesirable and considered to present an undue risk to the safety of cyclists and pedestrians moving along Crutched Friars and to highway safety in general.

159. The proposals seek to provide a new on-site servicing area to the rear of the site accessed from Carlisle Avenue which is a one-way street (westbound) servicing local traffic only. The servicing area would be

sufficient in size to accommodate one servicing vehicle up to 8m in length (7.5t) entirely off-street with sufficient space for this to be comfortably loaded and unloaded. Within the Transport Assessment the applicant has estimated that the proposed development will have a requirement of 11-12 daily deliveries which will be commensurate to the existing use on site, and this would be capped accordingly in the Section 106 agreement.

160. The proposed servicing area would not facilitate vehicles turning within the site and all servicing vehicles would be required to reverse into the off-street area in order to exit in a forward gear. This falls short of the requirements laid out in Policy DM16.5 which require servicing areas to facilitate both access and egress in a forward gear. The reversing manoeuvre would however be significantly shorter and safer than the existing situation on Rangoon Street. All movements would be suitably overseen by a trained member of the facilities management team and this would be secured through the Delivery and Servicing Management Plan. Vehicular traffic along Carlisle Avenue is low and whilst forming part of a cycle route levels of cycling activity are not significant. It is not considered that this arrangement would pose any undue risk to highway safety as a result.

161. The application proposes changes to the undercroft leading into Carlisle Avenue to increase the height clearance of the existing oversail from 4.11m in height to 5.7m. This would ensure compliance with CoL minimum height requirements for projections over the highway and would ensure there was no undue risk from collisions with servicing vehicles accessing Carlyle Avenue.

162. The draft City Plan 2036 Policy VT2 requires delivery to and servicing of new developments to take place outside peak hours (0700-1000, 1200-1400, and 1600-1900 on weekdays) and requires justification where deliveries within peak hours are considered necessary. The applicant has agreed to no servicing at peak times 0700-1000, 1200-1400, and 1600-1900, in line with the City of London Transport Strategy. Cargo bikes would be permitted to access the proposed internal off-street servicing area during these times.

163. The development will be required to produce a delivery and servicing plan (DSP) which will secured by Section 106 obligation. This will be required to include a suitable consolidation strategy to reduce overall servicing trips to and from the site and the Applicant has agreed to this requirement.

Car parking

164. London Plan Policy T6 (Car parking), Local Plan 2015 Policy DM16.5 and the draft City Plan 2036 Policy VT3 require developments in the City to be car-free except for designated Blue Badge spaces.

165. The development is proposed as car free with no parking to be provided on-site. The applicant has investigated options to include a Blue badge bay on-site. It is acknowledged that providing an on-site space would have material implications for the wider layout of the site ground floor and it is agreed that the provision of a bay on site would not be practicable. The proposals seek to provide one new blue badge bay on-street adjacent to the site which would be delivered as part of the wider Section 278 works and parking changes for the site (discussed further below). This would ensure compliance with London Plan policy requirements for blue badge provision which require a minimum provision of one blue badge bay in instances where no other on-site parking is to be provided. Officers are satisfied that a new blue badge bay could be suitably accommodated on-street without any net loss of existing bays and without being prejudicial to the wider highway operation.

Trip Generation

166. A trip generation assessment has been conducted for the site. The assessment has been carried out using TRICS data for a similar sized hotel development in inner London within a PTAL 6B area. It is predicted that the total number of two-way trips generated by the development would be 1962 per day, which is an increase of 602 daily movements when compared to the existing office use. It is however predicted that the proposed uses would generate a modest reduction of overall trips during the AM peak hour (0800-0900) and PM peak hour (1700-1800) when compared to the existing with the vast majority undertaken by sustainable modes. This is typical of hotel uses which generate a more even spread of trips across the day at lower intensities when compared to an office use.

167. The Trip generation assessment predicts that the hotel element of the development would generate 80 daily taxi trips (160 two-way movements) which equates to circa 8% of total trips generated for this use. The assessment also identifies that an additional 99 vehicular trips (excluding servicing) would be generated however these are discounted due to the site not providing any on-site car parking opportunities. Based upon similar hotel uses across the City, Officers would consider a figure of 15% of hotel trips by taxi and private hire vehicle (i.e. 141 daily trips) to represent a robust worst-case scenario

and the assessment figure of 8% is therefore considered to underrepresent the likely levels of taxi/private hire activity.

168. It is however the case that the proposals include a change to the on-street parking layout to provide increased opportunities for safe and convenient pick-ups and drop-offs adjacent to the site entrance on Jewry Street. Picking up and dropping off could also safely take place from within the on-street parking bays adjacent to the site when these are unoccupied as well as from a stretch of single yellow line on the northern side of the Rangoon Street junction. Accordingly, even when applying a higher figure of 15% of trips, when distributed across the day, it is not considered that this level of activity would unduly impact upon the function or safety of the local highway and could safely be accommodated on-street.

169. A Section 106 obligation requiring the submission of a Guest Travel plan would be secured. This would outline a clear package of measures the scheme will implement in order to encourage visitors to undertake trips via sustainable modes or use existing taxi ranks within the vicinity of the site to reduce overall taxi activity generated on the local highway surrounding the site.

170. The application identifies that it is not expected that the hotel would generate any demand for coach parking given the nature of the proposed hotel. Notwithstanding, given the scale of the hotel proposed and constrained highway network in the vicinity, an obligation is proposed restricting any coaches associated with the hotel waiting or parking on the local highway at any time unless otherwise agreed in writing with the Highway Authority.

<u>Stopping Up/ Adoption</u>

171. As the highway authority for Rangoon Street we have a duty, set out under section 130 of the Highways Act 1980, to “assert and protect the rights of the public to the use and enjoyment of any highway for which they are the highway authority, including any roadside waste that forms part of it”, and “to prevent, as far as possible, the stopping up or obstruction of the highways”.

172. The application proposes to stop up a total of 22.78sqm on the eastern side of Rangoon Street to facilitate new entrance steps leading up to the southern entrance of the site. Rangoon Street is not a through route, so there would be no implications for pedestrian movement, however servicing will continue to take place on this street for the existing adjacent site on Crutched Friars. The applicant has provided

swept path diagrams which suitably demonstrate that the proposed stopping up of the Highway would not prejudice the ability of this adjacent development to continue servicing their site from Rangoon Street nor would it result in any displacement of this servicing activity elsewhere on the local highway network.

173. The proposed development includes alterations to the building line on the Crutched Friars/Jewry Street elevation and this includes this frontage being set back from its existing line at various locations. The applicant proposes to offer up these newly recessed area of privately maintained land for adoption as Public Highway. Two newly recessed areas are also proposed for adoption as Public Highway on the Carlisle Avenue frontage. As a result the Jewry Street footway would be consistent in width along its full length and these areas are considered appropriate for the Highway Authority to adopt under S72 of the Highways Act (1980).

174. Overall, the proposals would result in a net increase of 15.5sqm of Public Highway.

On-Street layout

175. The proposals would require changes to the existing on-street parking designations surrounding the site to accommodate a new servicing access and disabled bay on Carlisle Avenue and a new length of single yellow line on Jewry Street to accommodate the expected level of taxi activity. Officers are satisfied that the proposed on-street changes could be accommodated with no net loss to existing visitor bays and without any undue impact to the wider function of the highway in general. The applicant would be responsible for paying for the promotion of all required changes to the Traffic Management Order and this should be secured within the S106.

Oversailing

176. The proposal includes new areas of oversail on the upper floor levels of the site on Jewry Street, Rangoon Street and Carlyle Avenue. The areas of oversailing would not impact the current access or movement along the street and all areas of proposed oversail are at a minimum height of 5.7m, which meets our minimum oversailing requirements. Technical approval and a licence pursuant to Section 177 of the Highways Act 1980 would be required for oversailing of the highway.

Public Realm and S278/S72 Agreement

177. Although not limited to, the following works shall be included within a Section 278/S72 Agreement:

- Realignment and improvement of footways on Rangoon Street and wider public realm opportunities;
- Dedication of land on Jewry Street;
- Alterations to Rangoon Street and Carlisle Avenue junctions to facilitate safer and easier pedestrian movement e.g. raised tables
- Relaying of all footways adjacent to site in York Stone;
- Change to Traffic Management orders on Carlisle Avenue, Jewry Street and Crosswall;
- New servicing Crossover on Carlisle Avenue;
- Contribution to tree planting in the vicinity of the site.

Transportation Conclusion

178. Subject to conditions and planning obligations, the proposal would accord with transportation policies including London Plan policies T5 cycle parking, T6 car parking. It accords with the Local Plan 2015 Policy DM3.2, and the draft City Plan 2036 Policies AT1, AT2, AT3, and VT3. The proposals are not in line with Policy DM16.5 of the Local Plan, or draft City Plan Policy VT2 relating to deliveries and servicing however, the proposals are considered acceptable.

179. Overall, the proposal is considered acceptable in transport terms and would deliver public realm improvements particularly through the introduction of footway widening on Jewry Street and improvements to Rangoon Street.

Waste Collection arrangements

180. Local Plan policies CS17 and DM17.1 require sustainable choices for waste and for facilities to be integrated into building design. Draft City Plan policies S16 and CE1 requires developments to consider circular economy principles.

181. The submitted Waste Management Plan estimates one waste collection per day. The proposed waste storage is located at basement level which includes recycling facilities for at least 50% of capacity, which would be accessed by a lift from ground floor which is accessed from the loading bay facing Carlisle Avenue.

182. The Cleansing Team have reviewed the waste collection arrangements and confirmed this is considered acceptable.

183. The waste storage is considered to comply with Local Plan policies CS17 and DM17.1 and draft City Plan policies S16 and CE1.

The impact of the proposal in terms of environmental sustainability

184. The Applicant has provided assessments regarding: circular economy; operational energy and carbon emissions; BREEAM; whole life-cycle carbon emissions; urban greening and biodiversity; and climate resilience, which are discussed further below.

Circular Economy

185. London Plan Policy SI7 sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM17.2, draft City Plan Policies S16 and CE1 set out the City's support for circular economy principles.

186. The submitted Circular Economy Statement describes the strategic approach to incorporating circularity principles and actions according to the GLA Circular Economy Guidance. The applicant submitted supplementary information to support the circular economy principles as requested.

187. The applicant has considered three development options, all of which would achieve approximately the same overall floorspace figures (the maximum retention option would achieve 232sqm less floorspace compared to the other 2 options). The options differ in the quantity of retained structure, looking at:
    1. "maximum retention" (63% retention of fabric by volume excluding facade),
    2. "new superstructure" (5% retention) and
    3. "all new structure" (0% retention).

    The assessment of the options in whole life-cycle carbon terms indicates that option 2 would result in 16% higher whole life-cycle carbon emissions (life-cycle modules A-C, excluding operational carbon emissions) compared to option 1, due to necessary structural alterations and strengthening works. The applicants consider that the circularity benefits of option 2 would offset the higher carbon emissions through incorporating flexibility, adaptability as well as material efficiency in the fit-out to a hotel, Option 3 would result in 26% higher carbon emissions compared to option 1 and is not considered to add significant value over option 2. Therefore options (1) and (3) have been discounted, as set out in more detail in the Whole Life-Cycle carbon emissions section.

188. The option "new superstructure" subject to this planning application is based on the retention of 5% of fabric by volume, including part retention of ground floor slab, part retention of basement floor slab of

retaining wall, part retention of foundations and retention of some existing columns, but excluding the facades.

189. The new development will encompass a wide range of circularity principles:

- Consideration of Design for Manufacture and Assembly (DfMA) and offsite fabrication where possible.
- Materials to be responsibly sourced, locally where possible, and maximising of recycled content and use of FSC timber.
- Steel frame proposed as demountable and potential use of recycled steel.
- Designing spaces for flexibility whilst enabling access to all elements that could be reused or need more frequent replacement.
- Designing for adaptable ground floor space.
- Designing out waste through modular design.
- Aiming to achieve GLA target for 95% of non-hazardous demolition waste to be diverted from landfill.
- Aiming to achieve GLA target for 95% of non-hazardous construction waste to be diverted from landfill.
- Incorporating appropriate refuse storage to enable recycling and best practice waste management.
- Aiming to achieve 65% municipal waste recycling London Plan target.

190. Further details that address all aspects of circular economy would be confirmed after the detailed design phase. A Detailed Circular Economy Assessment and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm that high aspirations can be achieved have been requested by conditions. The detailed assessment will be expected to demonstrate that the relevant targets set out in the GLA Circular Economy Guidance can be and have been met.

191. Subject to conditions, the development is considered to comply with London Plan Policy SI7, Local Plan Policies CS15 and DM17.2, and draft City Plan Policies S16 and CE1.

Operational energy strategy and carbon emissions

192. The London Plan states that major development should be net zero-carbon (Policy SI 2) with a minimum on-site reduction of at least 35% beyond Building Regulations.

193. Local Plan policies CS15 and DM15.2 requires development to minimise carbon emissions and reduce energy consumption and Policy DM15.3 promotes use of low and zero carbon technologies. Policy DM15.4 requires offsetting of carbon emissions.

194. The Energy Statement accompanying the planning application demonstrates that the development has been designed to achieve an overall 54% reduction in regulated carbon emissions compared with a Building Regulations compliant building. This exceeds the London Plan target of 35%. To account for shortfall to 'zero carbon' of 46%, the applicant will provide a carbon offsetting contribution to 100% (currently estimated at £786,654).

195. The proposed energy demand reduction strategy includes a comprehensive package of energy efficiency measures (listed below), however only 1% in carbon emissions reduction can be achieved at planning stage due to the high energy demand for hot water in a hotel. The proposed energy efficiency measures that include:
    - 'Fabric first' approach for façade design to achieve optimum balance between natural light to reduce artificial light while minimising solar gain through adjusting glazing specifications to orientation, and façade shading depths, and internal blinds;
    - Water-efficient fixtures and fittings;
    - Mechanical Ventilation with Heat Recovery (MVHR);
    - Low-energy, efficient light fittings (such as LED or CFL) and lighting control systems;
    - insulation of heating and hot water pipework;
    - energy efficient white goods with low heat output.

196. A condition is recommended for the Applicant to provide an assessment of opportunities to improve the energy efficiency from the GLA 'Be Lean' Stage.

197. The Applicant has discounted the following efficiency measures:
    - Openable elements to drive the potential for passive ventilation and night cooling, reducing the potential for overheating and reliance on mechanical cooling;
    - Waste water heat recovery due to space, access and maintenance limitations to each hotel bedroom, as well as considerations of its operational and embodied carbon impact.

198. A condition is recommended for the applicant to provide details of opportunities to provide passive ventilation for hotel bedrooms in the detailed design phase.

199. There is currently no available district heating network close enough to the site, however, the opportunity to connect to a future district heating network would be incorporated into the proposed development as shown in the proposed basement plan.

200. Air Source Heat Pumps (ASHPs) combined with variable refrigerant flow (VRF) systems and a PV panel installation of 35sqm would result in a reduction of regulated CO2 emissions of 53%.

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

202. Subject to conditions, the development is considered to comply with London Plan Policy SI 2, Local Plan Policies CS15, DM15.2, DM15.3 and DM15.4, and draft City Plan Policy DE1.

BREEAM

203. Local Plan Policy CS15 and requires major development to achieve "excellent" or "outstanding", with draft City Plan Policy DE1 requiring development to aim for "outstanding" with "excellent" as a minimum and requires maximum credits for the City's priorities (energy, water, pollution, materials and climate resilience).

204. A BREEAM New Construction 2018 pre-assessment has been prepared, targeting an "excellent" rating with an aspiration for "Outstanding".

205. The assumptions made as part of the preliminary pre-assessment indicate that the proposals can meet all the mandatory level requirements for the targeted rating including a score of at least 75.7%. The pre-assessment is on track to achieve a high number of credits in the CoL's priority categories of Energy, Water, Pollution and Materials, as well as the climate resilience credit in the Waste category,

with the exception of the Water category due to the high water demand of a hotel. Details of potable water saving features are recommended to be requested by condition to ensure that water use is minimised and measures to reduce water demand in line with policy and to improve bream credits in water category.

206. 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

207. London Plan Policy SI2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle (WLC) 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 WLC Carbon emissions of the building. The WLC Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.

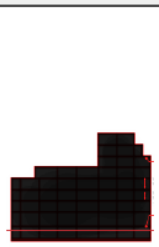
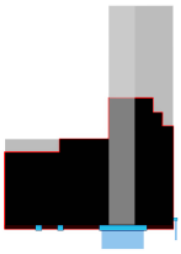
208. Local Plan CS15 requires the highest feasible sustainability standards in the design, construction, operation and 'end of life' phase of development. Policy DM15.2 requires development to reduce likely energy consumption. In addition draft City Policy DE1 requires major development to demonstrate retention of embodied carbon within building structures where feasible.

209. The proposed strategy is underpinned by a quantitative assessment of whole life-cycle carbon emissions of the proposed "new superstructure" option compared to a "maximum retention" option and a "all new structure" option. The applicants have confirmed that this assessment is principally in line with the method set out in the draft Whole Lifecycle Optioneering Planning Advice Note that was not available at the time the planning application was submitted. The options are designed to achieve comparable levels of floorspace. The

calculations only relate to the upfront carbon as the assessment assumes the same new façade system to improve energy efficiency and to suit the new use, as well as interior and building services fit-out would be the same for all options. These comprise:

1. Maximum Retention: Reusing much of the existing structure, new cores and columns repositioning and strengthening works required along with some new foundations
2. New Superstructure: Retention of most of the substructure and some ground floor structure with new lightweight superstructure above along with some new foundations and strengthening works
3. All New Structure: full redevelopment.

Table 4: Whole life-cycle carbon options

Applicable	Existing building	Maximum retention	New superstructure	All new
Images New Existing				
Gross Internal Area (GIA)	5,770m²	10,889m²	11,121m²	11,121m²
Increase in GIA	-	5,119m²	5,351m²	5,351m²
Embodied carbon (A1-A5)	409 kgCO₂e/m² GIA	627 kgCO₂e/m² GIA	681 kgCO₂e/m² GIA	714 kgCO₂e/m² GIA
% structural material retained relative to existing volume (excluding façade)	100%	63%	5%	0%
Embodied carbon (A1-A5, B1-B5, C1-C4)	1,108 kgCO₂e/m² GIA	1,326 kgCO₂e/m² GIA	1,380 kgCO₂e/m² GIA	1,413 kgCO₂e/m² GIA
Operational energy (B6)	5,466 kgCO₂e/m² GIA	1,607 kgCO₂e/m² GIA	1,607 kgCO₂e/m² GIA	1,607 kgCO₂e/m² GIA
Fuel source	Gas	Electricity	Electricity	Electricity
Total WLCA (A1-A5, B1-B6, C1-C4, D)	6,192 kgCO₂e/m² GIA	2,552 kgCO₂e/m² GIA	2,606 kgCO₂e/m² GIA	2,639 kgCO₂e/m² GIA
Total WLCA (A1-A5, B1-B6, C1-C4, D)	35,731 tCO₂e	27,783 tCO₂e	28,976 tCO₂e	29,343 tCO₂e

210. The assessment concludes that option 2 would result in a 16% increase of whole life-cycle carbon emissions compared to option 1, and 26% less carbon emissions compared to option 3, as demonstrated by the graph below that indicates the carbon emissions from modules A1-A5 (for product and construction process stages at practical completion) and from modules A-C (product, construction process, use and end of life stages), expressed in tonnes for the whole development. The decision was made in favour of option 2 – new superstructure, due to:

- the opportunities linked to the flexibility that a new superstructure would provide in terms of future adaptability, longevity, disassembly, building services replacement and optimisation of material use for the fit-out;
- and in particular the existing head height constraint of the deep reinforced concrete frame that would restrict an efficient building services layout;
- limitations to the enhancement of the public realm including moving the servicing of the building to Carlisle Avenue.

211. In addition, the Applicant has confirmed that the Proposed Development would result in 17% retention of existing embodied carbon from structure, compared to 3% of an all new development.

212. The assessment demonstrates that the typical floors of the Proposed Development could accommodate residential, student residential and co-living models, and alterations would be feasible to incorporate office uses into the ground and first floor.

213. The submitted Whole Life-Cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table below. Further improvements are sought during the forthcoming detailed design stage to reach the GLA's Aspirational Benchmark, in particular with regard to material selection – maximising recycled contents, influence product specifications – as well as using refrigerants with low global warming potential.

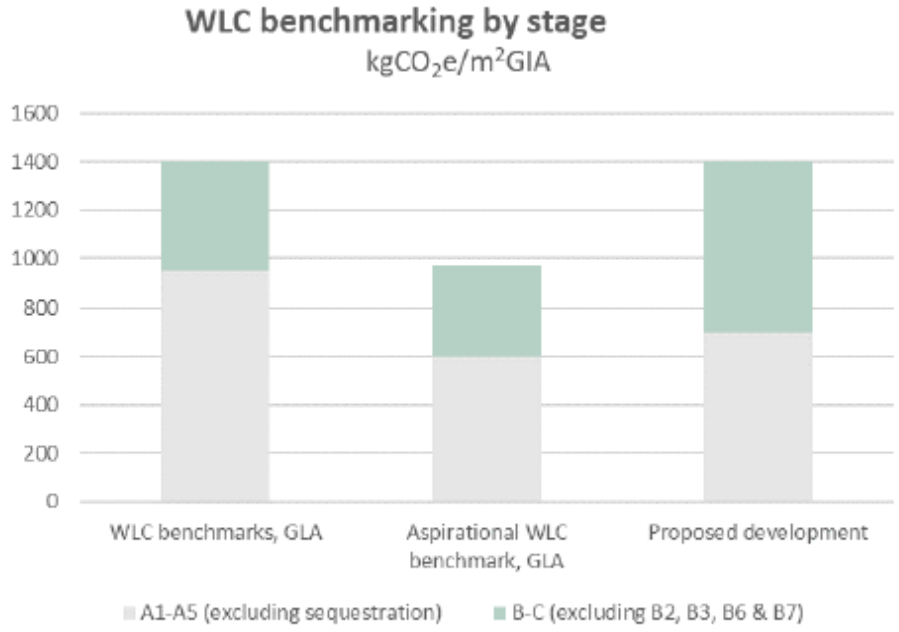


Figure 14: Comparison of the WLCA (Modules A1-A5, B1-B5, C1-C4) to published GLA standard and aspirational benchmarks.

214. These figures would result in overall (including B6 and B7) whole life-cycle carbon emissions of 22,132,700 kg CO2e being emitted over a 60-year period. The decarbonisation of the grid would result in reducing the operational carbon emissions as part of the whole life-cycle carbon emissions from 56% to 31%.

215. This graph shows that, over the proposed building's whole life-cycle, the embodied carbon emissions calculations at planning stage demonstrate a reduced amount of carbon emissions compared to the GLA's standard benchmark emissions target. It is anticipated that during the detailed design stage further improvements can be achieved, in particular in the product stages A1 – A3 of the building's life-cycle, by careful choice of materials and structural optimisation. 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.

216. Therefore the development is considered to comply with London Plan Policy SI2, and Local Plan policies CS15 and DM15.2, and Draft City Plan policies DE1 and S8.

Urban Greening and Biodiversity

217. Local Plan Policy DM19.2 promotes Urban Greening and Biodiversity, and Local Plan policies DM10.2 and DM10.3 and draft City Plan

policies OS2 and OS3 encourage high quality roof gardens and terraces and green walls, and promotes biodiversity. Biodiversity measures are promoted through the City of London Biodiversity Action Plan 2021-2026.

218. The existing site is hardscaped with no planting. The proposed development would include green walls, green roofs, roof terraces, planting and public realm improvements. Green walls through climber plants are proposed to the columnar arches of the facade adding a further layer of greening.

219. An Urban Greening Factor (UGF) calculation based on the London Plan has been submitted. The UGF for this application has been calculated as 0.32 based on the information provided which exceeds the target in the London Plan of 0.3. it would include 45 trees (birch, pine and cherry trees) across the different roof levels.

220. A Biodiversity Enhancement and Management Plan has been submitted and, in addition to habitat creation through greening, the applicant proposes log piles, bat boxes and bird boxes. This would result in a net gain in biodiversity to the site.

221. The green roofs, green walls and planting proposed would enhance biodiversity and encourage the use of outdoor spaces improving well-being. The green roof would include a blue roof, with a potential area of 635 sqm. The urban greening elements would enhance the environment as this area of the city is lacking in green features.

222. Details of the quality and maintenance of the proposed urban greening including blue roof are required by condition.

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

Contaminated Land

224. Local Plan Policy DM15.8 and draft City Plan Policy HL4 expects development to carry out detailed ground investigation to establish whether the site is contaminated. The Applicant has submitted a Ground Investigation Report with the application.

225. The Proposed Development includes basement works. The results of the chemical analyses have indicated the samples tested to be free from elevated concentrations of contaminants. The Report states that consideration should be given to a ground movement assessment

once the proposals have been finalised in order to determine movements to be expected as a result of development.

226. Conditions are recommended to require reporting on any identified contaminated land.

227. Subject to conditions, the development is considered to comply with Local Plan Policy DM15.8 and draft City Plan Policy HL4.

Climate Change Resilience

Water resources

228. The Applicant is proposing water efficiency measures to encourage efficient water use through fixtures, fittings and appliances including a leak detection system to help reduce the internal water consumption of the proposed development. The Development is targeting as a minimum, 1 credit out of 5 towards achieving BREEAM Excellent, which is the equivalent to a 12.5% reduction in water consumption over a baseline building. Further opportunities for reduction would be explored as the design develops.

229. The Applicant is not proposing the incorporation of a rainwater and greywater collection system for irrigation of landscaping and other water uses, as requested by Officers. This would reduce potable water demand of the development minimising use of water resources.

230. Therefore a condition is recommended which would require the Applicant to provide details for greywater and rainwater recycling at the detailed design stage.

Heat Stress

231. The sustainability statement outlines measures to prevent overheating through passive design measures including shading, reduced glazing areas and insulation have been incorporated into the design. Air conditioning through high efficiency VRF systems and ASHPs would be provided.

232. In addition, landscaping within the public realm at ground level and at roof levels would contribute to reducing the urban heat island effect.

233. The applicant is not proposing natural ventilation despite Officer requests. This would minimise summer heat gain and would reduce the need for carbon intensive air conditioning for the majority of the development making the building resilient to higher temperatures and

urban heat island effects. The Applicant has said the openable windows are not provided as the performance of the building fabric has been maximised to ensure heating and cooling loads are minimised and that openable window would degrade the acoustic performance of the façade.

234. Officers have raised concerns regarding the absence of openable windows as this would reduce overheating through passive measures and would increase the flexibility of the building for future uses in line with circular economy aims.

235. Therefore a condition is recommended which requires the Applicant to explore opportunities for openable windows at the detailed design stage.

Natural Capital and Pest & Diseases

236. The proposed development will incorporate urban greening and enhance ecological value of the site that would improve significantly on the existing quantity and quality of urban greening in the area, both as public realm enhancement and biodiversity gain overall. This will help to enhance biodiversity providing green routes and small habitats. The details of the landscape planting will be important in ensuring that the plants and habitats created are resilient to hotter dryer summers, warmer wetter winters, more extreme weather events and pests and diseases.

237. 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.

Flood Risk and Sustainable Urban Drainage

238. London Plan Policy GG6 requires development to be designed to adapt to changing climate and Policy SI requires flood risk management including natural flood management methods, and Policy SI13 require sustainable drainage.

239. Local Plan Policy CS18 seeks to ensure the City remains at low risk of all flooding. The use of Sustainable Drainage Systems (SuDS) is supported by policy CR3 of the draft City Plan.

240. The Applicant has submitted a Flood Risk Assessment and a Sustainable Drainage Strategy which confirms the site is within Flood Zone 1 which has the lowest probability of flooding.

241. The surface water drainage system will be designed for all storms up to and including the 1 in 100 year + 40% climate change event. The expected percentage reduction of surface water discharge (for a 1 in 100 year rainfall event) is 89%.

242. To protect the basement level from the risk of surcharging public sewers, a submersible packaged pumping station (with dual pumps and alarms) would be incorporated into the design to pump any drainage requirements from basement level.

243. Thames Water have been consulted and recommended a condition.

244. The Lead Local Flood Authority have reviewed the details and recommended two conditions for details to be submitted prior to construction, and prior to completion of shell and core.

245. The proposed Flood Risk and SUDS strategy would accord with Local Plan Policy CS18 of the Local Plan, S15, CR2 and CR3 of the draft City Plan and policies GG6, SI12 and SI13 of the London Plan.

Sustainability Conclusion

246. 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.

247. The proposed development, by way of its central location within London, its opportunities for providing a positive and healthy living environment, and its environmental credentials, would positively contribute to the economic, social and environmental sustainability of the City of London. The proposed sustainability strategy meets, and in some aspects, exceeds current London Plan policies as well as Local Plan policies, and it targets an “excellent” BREEAM assessment rating.

248. 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, providing various opportunities for urban greening and biodiversity, and low energy technologies would be employed to significantly reduce operational carbon emissions beyond London Plan requirements.

Environmental Impact of Proposals on Surrounding Area

249. 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. Draft City Plan Strategic Policy S8 and Policy DE2 requires developments to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

Daylight and Sunlight and Overshadowing

Policy and Guidance Context

250. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context.

251. Local Plan Policy DM10.7 seeks to resist development that would result in unacceptable daylight and sunlight levels to nearby dwellings and open spaces taking account of the BRE guidelines.

252. Draft City Plan Policy DE8 requires development proposals to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards taking account of the Building Research Establishment's guidelines.

253. Both policies recognise that it may not always be practicable to enable ideal daylight and sunlight conditions in densely developed city-centre locations. Paragraph 3.10.41 of the Local Plan and Policy HS3 of draft City Plan state that the City will take into account the cumulative effect of development proposals.

254. Local Plan Policy DM21.3 seeks to protect the residential environment including daylight and sunlight to adjacent residential accommodation.

255. The BRE guidelines present the following methodologies for measuring the impact of development on the daylight and sunlight

received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light (such as schools, hotels and hostels) (a full explanation of the methodologies is provided in Appendix C):

Daylight

256. Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. 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. The BRE Guide recommends compliance with both the VSC and daylight distribution (NSL) guidelines.

Sunlight

257. Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south.

Interpreting results

258. 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 as 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.

Overshadowing

259. Overshadowing is measured using Sunlight Hours on the Ground (SHOG) and BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces.

Setting Alternative Target Values (including Mirror Massing)

260. BRE guidelines notes that the numerical target values are purely advisory and different targets may be used based on the characteristics of the proposed development and/or its location. Therefore, a mirror massing study can be undertaken to set an alternative target generated from the scale/layout of existing development within the surrounding context or be based on an extant planning permission. This could be set to a ‘mirror-image’ building of

the same height and size, an equal distance away on the other side of the boundary. In this case, the student accommodation building was used.

Assessment

261. A comprehensive daylight, sunlight, overshadowing and solar glare assessment has been provided having regard to the BRE guidance (2011). Since the Assessment was undertaken, updated BRE guidance (2022) has been published; the Consultant has confirmed that this does not affect the calculations or conclusions in the report as the guidance for considering the effect on neighbouring properties and open spaces remains consistent with the previous version of the BRE Guidelines, which is accepted by Officers.

262. It should be noted that the proposals have been revised in response to Officer requests and include a reduction to the massing at the southern prow of the proposed development on Jewry Street, to help mitigate the impact on the daylight and sunlight received by the student accommodation opposite. The reduction in massing has been offset by an increase in massing on Carlisle Avenue from five to seven storeys.

263. In addition to the standard methods of assessment for daylight recommended by the BRE (VSC and NSL), the updated Assessment includes a supplementary radiance-based assessment of the internal daylight levels within the student accommodation at Emperor House and Roman Wall House, which takes account of internal and externally reflected light in the existing and proposed scenarios and a mirror massing assessment, which has adopted the profile of the existing development at Roman Wall House for setting alternative target values for daylight for the Proposed Development (if it mirrored the massing of the recently completed Urbanest scheme opposite).

264. The updated daylight and sunlight report has been independently reviewed by chartered surveyors, Delva Patman Redler.

265. The assessment considers three neighbouring receptors listed below:
    1. Flats 1-19, 8 India Street;
    2. Flats 1-14 Fenchurch House, 136-138 Minories;
    3. Roman Wall House/Emperor House: student accommodation.

Residential properties

266. The neighbouring properties assessed for the potential impact on daylight and sunlight levels were at 8 India Street and Flats 1-14 Fenchurch House, 136-138 Minories.

267. Reductions in sunlight and daylight in all rooms at 8 India Street and 136-138 Minories would be within BRE guidelines and are considered to be negligible.

Roman Wall House and Emperor House: Student accommodation

268. Student housing is considered to be a more sensitive use than offices in terms of reductions in daylight and sunlight, but less sensitive than permanent residential housing.

269. The student accommodation includes two linked buildings: Emperor House a larger building partially screened behind Roman Wall House and set back from Jewry Street, and Roman Wall House fronting Jewry Street. A total of 266 windows serving 158 bedrooms and studio rooms were assessed.

Sunlight

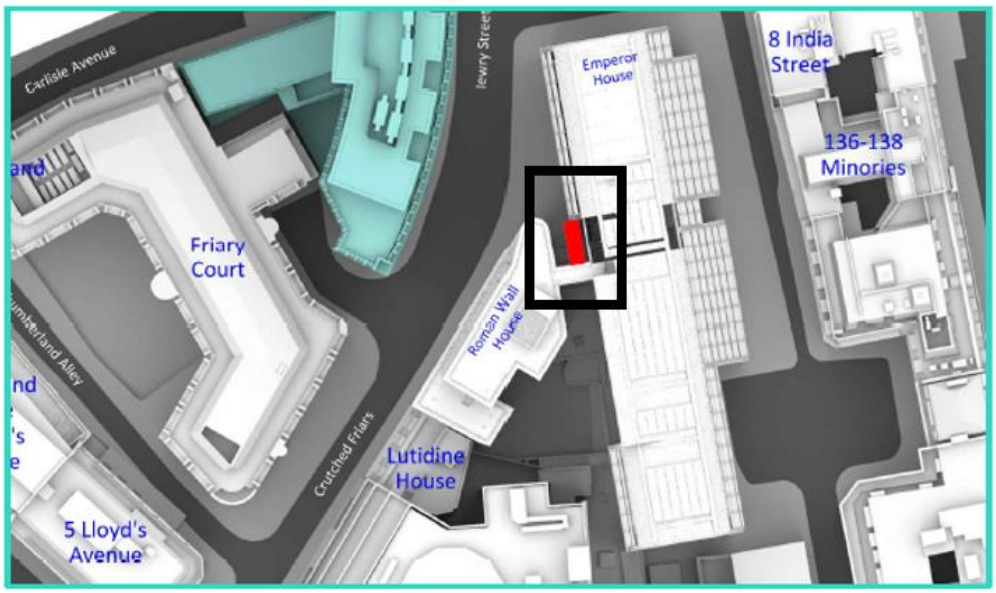
270. There are 33 rooms within Emperor House which contain a window facing within 90 degrees of due south. The sunlight assessment concludes that all rooms would experience reductions that would be within the BRE guidelines and therefore would not be adversely affected.

Daylight: Vertical Sky Component

271. The VSC daylight results demonstrate that 118 windows (44%) would experience a small loss of light that would not be considered noticeable (i.e. within 20% of the existing baseline), in accordance with the BRE guidelines.

272. Of the remaining 148 windows, 52 would experience minor adverse reductions of between 21% - 30%; 33 would experience moderate adverse reductions between 31% - 40%); and 63 would experience major adverse reductions which are greater than 40%.

273. The windows that would experience the greatest percentage reductions in daylight are located between the two building elements of Emperor House and Roman Wall House (highlighted in red below). These receive very low levels of daylight in the existing scenario due to location between buildings, and whilst the percentage reductions in VSC would be high, the actual reduction in the amount of daylight received would be low (below 2% VSC).



Daylight: No-Sky Line

274. The NSL daylight results demonstrate that 108 of the 158 rooms (68%) would experience small reductions in daylight distribution, which would be within the BRE guidelines (within 20% of the existing baseline) therefore not considered noticeable.

275. Of the remaining 50 rooms, 15 would experience minor adverse reductions in NSL of between 21 and 30%, 11 would experience moderate adverse reductions of between 31 and 40%, and 24 would experience reductions greater than 40% (a major adverse impact).

Daylight – Radiance and Mirror Massing

276. The Radiance Assessment undertaken is not meant to replace the submitted daylight and sunlight assessments, but to provide a further way to illustrate daylight changes within habitable rooms in the neighbouring properties.

277. The radiance-based assessment demonstrates that 124 of the 125 rooms within Roman Wall House would retain a radiance based ADF value of 1%, which is typically adopted as a minimum target for bedrooms. The remaining room (R4/2021) would retain a radiance based ADF of 0.88%, falling below 1% as a result of the Proposed Development. A total of 15 of the rooms within Roman Wall House are classified as studios, which are typically considered against a 1.5% ADF minimum target value within residential accommodation, given the presence of a kitchen within the space. When assessed against this value, 8 of the 15 studios (at first to fourth floor levels) would fall below the minimum target.

278. Student accommodation is not explicitly assigned a target Daylight Factor value within the BRE Guidelines, but it is understood that it is common practice is to assign a minimum target of 1% ADF to student rooms. Taking this approach, the radiance-based assessment demonstrates that, except for one room at first floor level (R4/2021), the student accommodation within Roman Wall House would retain ADF values that meet and exceed this minimum target.

279. At Emperor House, 30 of the 33 bedrooms assessed would not meet the 1% ADF target value in the existing or proposed scenario. This is because they are positioned behind Roman Wall House and have limited access to daylight in the existing built context. The mirror massing assessment, which has been conducted by plotting a mirrored building profile of Roman Wall House on the development site, demonstrates that a number of rooms and windows within Emperor House / Roman Wall House would experience slight gains in VSC and NSL as a result of the proposed development (when assessed against the hypothetical mirror massing baseline). The largest reduction in daylight when assessed against a mirror massing baseline would be 18.27%, which would not be noticeable. Overall, the proposed scheme would be considered to have a similar effect as mirror massing, which can be considered to be acceptable.

280. The radiance assessment demonstrates that with the exception of one room, all rooms within Roman Wall House would meet and exceed the minimum 1% ADF target that is generally assigned to student accommodation. The mirror massing assessment demonstrates that the proposed development would have a similar impact to a hypothetical mirror massing of the development at Roman Wall House, and that a number of rooms and windows would experience slight gains in daylight. Taking these factors into consideration, the impacts of the proposed development on the student accommodation is considered to be acceptable.

281. In addition, the Assessment highlights that the approved plans for the student accommodation show the area immediately in front of the windows for the location of the desk where higher levels of daylight would be experienced (than the ADF figure provided for the entire room) which would retain adequate light given the city centre location.

Non-domestic nearby uses

31 Jewry Street

282. City records show that the address directly to the northeast includes educational and religious uses at 31 Jewry Street. Whilst it is noted that development plan policy explicitly focuses on the impact on neighbouring housing / dwellings (and open spaces), a supplementary daylight (VSC, NSL and radiance) and sunlight (APSH) assessment has been provided for 31 Jewry Street, who have objected that the proposed development would adversely impact their rights to light. Whilst rights to light is not technically a material consideration in the determination of planning applications (unlike daylight and sunlight impacts), the building is, in part, in educational use, which, as per the BRE guidelines, may be considered to have a reasonable expectation of daylight.

283. The daylight consultants have obtained floor plans for 31 Jewry Street, which indicate that the windows to the southern end of the building typically serve classrooms. The rooms to the central part of the building along Jewry Street typically serve office areas and whilst the windows to the northern end of the building serve more classrooms, they are too far from the proposals to be notably affected. Detailed calculations have therefore been undertaken to the classrooms to south end of the building only.

284. The Vertical Sky Component, No-Sky Line and Annual Probable Sunlight Hours results indicate that the existing levels of daylight and sunlight are relatively low. Whilst the percentage reductions from the existing conditions are beyond the BRE guidance the actual reductions are relatively small, especially on the lower floors. The highest percentage reductions occur to the windows on the southern corner of the building, but these rooms are typically dual aspect which reduces the overall significance of the overall impact on the availability of light to these rooms.

285. It is noted that the top floor rooms have lantern lights and will therefore enjoy good levels of daylight in the existing and proposed conditions. In order to understand the likely actual effect on the building in greater detail the consultants have provided radiance-based results on a floor-by-floor basis in both the existing and proposed conditions.

286. When running Radiance based Average Daylight Factor (ADF) tests, British Standard 8206-2:2008 tells us that to have a predominantly daylit appearance a room should achieve an ADF between 2% to 5%.

287. When above 5% ADF, a room is unlikely to require electric lighting during the daytime. When below 2% ADF electric lighting is likely to be require for most, if not all of the time.

288. Starting at basement level, the Radiance results show that the existing ADF levels are very low and well below 2%. It is therefore clear that electric lighting will be required whenever the rooms are in use. In the proposed condition the radiance assessments show relatively little change and it is considered therefore that the proposed development will not materially affect the use nor enjoyment of these spaces.

289. At ground, first and second floor levels, the existing ADF levels are again all below 2%. The highest ADF recorded is 1.39% and all but 3 rooms are below 1% ADF in the exiting condition. It is therefore again clear that in order to use the rooms as classrooms (which would require a similar light level as an office space), electric lighting will most likely be required whenever the rooms are in use. Whilst there is a more noticeable difference between the existing and proposed results on the upper floors, the reduction of light in each case is a relatively small area close to the window. In addition, with the electric lights on, it is anticipated that this reduction of light is unlikely to be noticeable. It is therefore considered that the proposed development would not materially affect the use or enjoyment of these spaces.

290. At third floor level the rooms have the benefit of lantern lights and enjoy an existing ADF between 2% and 5%. This continues to the be case in the proposed condition so it is not anticipated that the way in which the rooms are used (i.e. whether they use supplementary electric lighting or not) will not materially change. In addition, the reductions of natural light in each room are relatively small and therefore the proposed development would not materially affect the use or the enjoyment of these spaces.

291. In summary the standard VSC, NSL and APSH results indicate that reductions beyond the BRE guidelines are likely to occur. However, the radiance-based results show that the existing levels of daylight are relatively low, and electric lighting is likely to be required to all rooms in the existing condition, except those on the top floor. This position does not change as a result of the proposed development so the way in which the rooms are used is unlikely to be materially affected. At third floor level the existing natural light levels are much higher, and they will remain high in the proposed condition due to the presence of the rooflights. Again therefore, the way in which the rooms are used are unlikely to be materially affected.

Offices on Carlisle Avenue

292. A comparative sectional study has been provided whereby the consultant has compared a typical section of the relationship between Friary Court and the consented 80 Fenchurch Street with a section through the proposed building and 88-90 Fenchurch Street. The study demonstrates that the proposed development could be considered comparable with the immediate surrounding buildings and therefore considered to be acceptable.

293. The consultant concludes that the affected Carlisle Avenue offices can therefore be considered to retain acceptable levels of daylight and sunlight. Whilst the height of the scheme could be considered comparable by way of the sectional study, daylight and sunlight levels have not been fully assessed as the properties are commercial offices, which is considered to be acceptable in a scenario where comparable sections have been demonstrated.

Overshadowing

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

295. The Applicant has assessed Aldgate Square and Aldgate Primary School, located to the north of the Site. The results demonstrate that these spaces would not be shaded by the Proposed Development and the effects can therefore be considered to be negligible.

296. In addition, the Assessment included a review of overshadowing to surrounding streets. The results demonstrate that on 21st June, a small amount of additional overshadowing will occur to the north of Jewry Street however overall, the streetscapes would continue to be able to enjoy a good level of sunlight.

297. Overall, the likely overshadowing the effects are not considered material and within what is expected in a dense urban environment.

Solar Glare

298. Three viewpoints were assessed and two of these would experience no solar glare. In a viewpoint looking west at the Proposed Development from India Street, the report identifies minor solar glare occurrences which would occur for a maximum of 15 minutes between 06:45 am and 07:00am on the 23rd May – 7th June and again from 7th-21st July.

299. This would be for approximately four weeks during the year where minor solar glare occurrences may occur. These occurrences can be mitigated through drivers using their visors if solar glare issues are experienced during the limited periods identified. In addition, the façade incudes a significant element of solid materials (vs. glazing) and therefore impacts are considered acceptable.

Daylight, Sunlight, Overshadowing and Solar Glare Conclusion

300. Taking into account the BRE Guidance and the site's location within a dense urban environment, it is considered that the proposal would not result in an unacceptable impact on the existing properties, would not noticeably reduce the daylight and sunlight to nearby dwellings or open spaces to unacceptable levels or result in unacceptable solar glare.

301. The assessment results demonstrate that the student accommodation in Emperor House and Roman Wall house would experience some adverse effects to the daylight received. The significance of these effects can be considered within the context of the relative transient nature of student accommodation when compared to permanent residential, and in that sense the BRE guidelines can be applied with a degree of flexibility.

302. The reductions in daylight that would be experienced as a result of the revised proposals represent an improvement on the original scheme. This can be attributed to the reduced massing at the southern prow of the building to Jewry Street.

303. The assessment results show that any daylight or sunlight reductions to the surrounding residential properties would continue to be within the BRE Guidelines and are unlikely to be noticeable to the occupants.

304. Overall, the impacts to the surrounding properties for daylight, sunlight, solar glare and overshadowing are considered to be acceptable.

305. As such, the impacts as a result of the proposed development is considered to be in accordance with Local Plan Policies DM10.7 and

DM21.3, Policy DE8 of the draft City Plan 2036 and London Plan policy D6(d).

Light pollution

306. Local Plan policies DM10.1 and DM15.7 and Draft City Plan policies HL3 and DE9 states developers must consider lighting impacts of development and reduce light pollution and light spillage from internal and external lighting.

307. The Applicant has provided a high-level Lighting Strategy. The report prepared by the daylight and sunlight consultant states that the potential for unwanted light pollution to occur onto the nearby residential buildings is very low due to the proposed use as a hotel as occupants are likely to draw curtains at night preventing light spillage.

308. The Applicant states that all external lighting provided as part of the Proposed Development will be designed in compliance the ILP Guidance notes for the reduction of obtrusive light (2011) and will be automatically switched off between 23:00 and 07:00.

309. A Lighting Strategy is recommended as a condition to reduce negative impacts of artificial light, particularly to student housing opposite. Subject to reserved details, the potential impacts are not considered to be material.

310. Therefore, subject to condition, the Officers consider the development complies with Local Plan policies DM10.1 and DM15.7, and Draft City Plan policies HL3 and DE9.

Wind assessment

311. London Plan Policy D8, Local Plan Policy DM10.1 and Draft City Plan Policy S8 require developments to optimise micro-climatic conditions and not to result in unacceptable wind impacts.

312. Computational Fluid testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site.

313. Wind conditions are compared with the intended pedestrian use of the various locations including carriageways, footways, bus stops and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Wind Microclimate Guidelines, consisting of five Comfort Categories defining conditions

suitable for: frequent sitting /occasional sitting /standing /walking /uncomfortable.

314. Table 6 outlines the various criteria for wind microclimate assessment. Assessments have been carried out for both the Windiest Season and the Summer Season and with surrounding buildings within a 400m radius of the site.

Table 6: City of London criteria included in assessment (and taken from the City's Microclimate Guidelines, 2019).

Key	Comfort Category	Threshold	Description
	Frequent Sitting	<2.5 m/s	Acceptable for frequent outdoor sitting use, e.g. restaurant, café.
	Occasional Sitting	2.5-4 m/s	Acceptable for occasional outdoor seating, e.g. general public outdoor spaces, balconies and terraces intended for occasional use, etc.
	Standing	4-6 m/s	Acceptable for entrances, bus stops, covered walkways or passageways beneath buildings.
	Walking	6-8 m/s	Acceptable for external pavements, walkways.
	Uncomfortable/unsafe	>8 m/s	Not comfortable for regular pedestrian access.

315. In addition to the baseline scenario In the Assessment, the following scenarios were tested:
    - Proposed Development with Existing Surrounding Buildings;
    - Proposed Development with Consented Cumulative Surrounding Buildings; and
    - Proposed Development with Consented Cumulative Surrounding Buildings and In-planning Schemes.

316. No soft landscaping has been included in the configurations tested, providing a worst-case scenario.

317. The City of London criteria for wind safety and comfort specifies a lower limit strong wind threshold when winds exceed 15m/s for more than 0.022% of the time (approximately 1.9 hours per year). These winds would present a safety risk for cyclists and pedestrians, particularly the elderly or very young and as such remedial measures would be required to reduce the occurrence of these winds.

318. Wind conditions were not assessed at the roof terraces of 80 Fenchurch Street. However the consultant has confirmed that due to the positioning of Boundary House, the proposed development is

expected to result in no impacts to wind conditions at 80 Fenchurch Street.

Existing Baseline Scenario

319. Wind conditions for the baseline scenario, all thoroughfares, pedestrian crossings, building entrances, bus stops and amenity spaces, are suitable for the intended use.

320. There are small areas of standing conditions locally around building corners and beneath existing buildings. Strong wind exceedances of 15m/s for more than 1.9 hours annually are not expected to occur.

Proposed Scenario

Proposed building with existing buildings

321. With the Proposed Development in place, conditions would be suitable for frequent sitting and occasional sitting use during the windiest season, with isolated areas of standing conditions, notably underneath the Proposed Development, consistent with the baseline conditions. Wind conditions during the summer season would overall become one category calmer.

322. There would be improvements to the north of Jewry Street, and windier areas immediately north, east and south of the Proposed Development.

323. All thoroughfares, entrances, bus stops, pedestrian crossings and ground level amenity would have suitable wind conditions for their intended uses.

324. The Level 14 terrace would range from frequent sitting to walking use during the summer and the south part would have walking and standing conditions. There is potential for strong wind exceedances to occur. Therefore, the terrace would have windier conditions than suitable, requiring mitigation measures to make the conditions suitable for its intended use, and it is expected that the mitigation would resolve strong wind exceedances.

325. The assessment states that with the implementation of these measures, the conditions would be acceptable for the intended use. Further details for the wind mitigation measures would be required to be submitted and approved prior to implementation and would be secured via condition.

326. Seating provisions off-site (Aldgate Square) would have the same conditions as reported in the baseline scenario, suitable for their intended use.

Cumulative scenarios

327. In the cumulative scenario including the consented schemes, wind conditions would remain suitable for standing use or calmer at ground level during the windiest season. Wind conditions at all thoroughfares, entrances, bus stops, crossing and ground floor amenity would remain suitable for intended usages.

328. The level 14 terrace would experience standing and walking conditions which would include uncomfortable conditions at the southern corner where there is potential for strong wind exceedances to occur, therefore mitigation measures (as identified above) would be required.

329. In the cumulative scenario with the in-planning schemes (not consented), wind conditions would remain suitable for standing use or calmer at ground level during the windiest season. When compared to the cumulative scenario (not including unconsented schemes), there would be an overall improvement in conditions with more areas of frequent sitting conditions around surrounding buildings.

330. Wind conditions at all thoroughfares, entrances, bus stops, crossings and ground floor amenity would remain suitable for the intended usages.

331. Standing and walking conditions on the proposed terrace at level 14 would remain and include uncomfortable conditions at the southern corner where there is potential for strong wind exceedances to occur therefore would require mitigation measures to improve conditions.

332. In all scenarios, no strong wind exceedances of 15m/s for more than 1.9 hours annually are expected to occur apart from the southern corner of the terrace in the absence of mitigation measures.

Mitigation measures

333. Mitigation measures are required for the terrace and the assessment recommends additional landscaping elements including:
    - 3 metre trees;
    - porous screens;
    - shrubs in planters;
    - balustrade height of at least 1.5metres.

334. Details of the mitigation measures would be required to be submitted and approved via condition.

Wind Microclimate Conclusion

335. A comprehensive pedestrian level wind assessment including an assessment of the level 14 roof terrace has been undertaken.

336. The assessment states the Proposed Development is not significantly taller than the surrounding buildings and therefore does not significantly change the local aerodynamics.

337. In conclusion, with the proposed development in place, where wind conditions become windier at ground level they remain suitable for the intended uses in the proposed and cumulative scenarios therefore no additional mitigation above that proposed is required.

338. There are unacceptable conditions at the proposed level 14 terrace to the south. Mitigation measures would be required in the form of trees, screens, planters and balustrades to make the wind conditions suitable for the intended use. The Details of the proposed mitigation measures will be secured by condition and will be required to be maintained throughout the life of the building.

339. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the Wind Assessment, to identify if the completed development has any material adverse effects not identified in the submitted CFD Wind Assessment and if any material adverse impacts are realised, mitigation measures would need to be explored and implemented.

340. Therefore, subject to mitigation measures, the development is considered to comply with London Plan Policy D8, Local Plan Policy DM10.1, and Draft City Plan 2036 Policy S8.

Thermal Comfort

341. London Plan Policy D8 and D9 and Draft City Plan Policy S8 states that development proposals should ensure that microclimatic considerations should be taken into account in order to encourage people to spend time in a place and that the environmental impacts - wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood - must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and

sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Draft City Plan Strategic Policy S12 requires developers to take account of the potential microclimate and thermal comfort impacts from tall building development at an early stage in the design process. Draft City Plan 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.

342. Although not considered a tall building in local policy, the assessment has been undertaken in this case.

343. The Thermal Comfort Guidelines for Developments in the City of London (2020) sets out how the thermal comfort assessment should be carried out. 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.

344. The Universal Thermal Climate Index (UTCI) metric will be utilised for predicting thermal comfort. The usage categories for thermal comfort is set out below and is used to define the categorisation of a given location.

Table 7. Thermal comfort categorisation for usage.

Usage Category	% of hours with Acceptable UTCI	Description
All Season	≥90% in each season	Appropriate for use all year round (e.g. parks)
Seasonal	≥90% spring-autumn AND ≥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	≥50% spring-autumn	Appropriate for short duration

		and/or infrequent sedentary uses during most of the year.
Transient	Transient <25% in winter OR <50% in any other season	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).

345. In accordance with the City of London Thermal Comfort Guidelines an outdoor thermal comfort assessment has been prepared. The proposals introduce sensitive receptors including new entrances at ground, public realm works and the roof level terrace.

346. Sensitive receptors within a 200m radius of the existing site have been considered in the assessment. At ground level, all entrances have been considered and would require short-term thermal comfort conditions or better to be considered acceptable for their intended use.

347. Four configurations have been assessed including:
    - the existing site with existing surrounding buildings;
    - the proposed development with the existing surrounding buildings;
    - the proposed development with consented cumulative surrounding buildings; and
    - the proposed development with consented and unconsented cumulative surrounding buildings.

348. At ground level, all entrances would require short-term thermal comfort conditions or better for the intended uses. For existing ground and terrace level amenity areas, these would require short-term or better thermal comfort conditions with small areas of short-term seasonal thermal comfort conditions considered acceptable for their intended use.

349. A public space proposed at Rangoon Street and the proposed terraces at level 14 would require all season or season thermal comfort conditions due to seating requirements. For bus stops, all-season short-term conditions are targeted.

350. The following ground and terrace level amenity spaces within the local area have been assessed:
    - The playground of the Aldgate School Primary School;
    - Aldgate Square;
    - The amenity space in front of 65 Crutched Friars;
    - Portsoken Street Garden;
    - The roof terrace of Saint Claire House;
    - The roof terrace at the south-west of One Creechurch Lane; and
    - The roof terrace of One America Square.

351. Thermal comfort conditions were not assessed at the roof terraces of 80 Fenchurch Street. Based on the results of this assessment and RWDI's professional judgement, it is not expected that the introduction of the Proposed Development would have a material effect on the thermal comfort conditions at the terraces of 80 Fenchurch, as the Proposed Development is considerably shorter and in an upwind location relative to 80 Fenchurch Street.

352. The wind mitigation measures were not considered during the wind microclimate assessments therefore have not been included in the study.

Existing Baseline Condition

353. Current public realm conditions are suitable for all season or seasonal thermal comfort aside from the roof terrace on north-west corner of One America Square which has short term thermal comfort conditions along the northern edges and the north west corner.

354. Immediately around the site, all areas are suitable for all season use apart from an area of Jewry Street to the north east which is suitable for seasonal use.

355. As conditions are suitable for seasonal use (at worst) along all pavements, all bus stops (which are required to be suitable for short term use) are suitable for the intended use.

Proposed development with existing surrounding buildings

Jewry Street:

356. The introduction of the proposed development would increase the amount of time that part of Jewry Street to the north would have all season thermal comfort conditions as it would improve thermal comfort during the winter season (from thermally comfortable 80-85% of time to 95-100%).

Carlisle Avenue:

357. The junction at Carlisle Avenue and Jewry Street would experience more seasonal conditions and would introduce additional short-term conditions than shown in the existing scenario due to the wind being squeezed through the narrower entrance beneath the overhang. However, conditions would be suitable for intended use (walking and cycling) for short duration and/or infrequent sedentary uses during most of the year.

Rangoon Street:

358. The proposed amenity space in Rangoon Street as well as the dedicated seating locations along the eastern façade would have all season or seasonal thermal comfort conditions, suitable the intended usage for short duration and/or infrequent sedentary uses during most of the year.

Entrances at site:

359. The ground floor level entrances to the Proposed Development would have all season thermal comfort, the best possible conditions.

Terraces at site:

360. There are two proposed terraces at level 14; the northern terrace would have all season and seasonal thermal comfort suitable for long-term dining use, however the southern terrace is predicted to have short term thermal comfort which would not be comfortable for long term dining use without any landscape features and mitigation measures. With the proposed mitigation measures, the terrace is expected to have suitable thermal comfort conditions for the intended long term dining use.

Wider surrounding area:

361. In the surrounding area, at ground level including bus stops and amenity spaces, there would be all season and seasonal comfort conditions which would be suitable for their intended use for short duration and/or infrequent sedentary uses.

362. The surrounding podium and roof level areas would experience no material difference to thermal comfort from the existing scenario.

Proposed development with consented surrounding buildings

363. The introduction of consented developments in this cumulative scenario results in the following changes:

Jewry Street

364. The introduction of the consented applications would result in slight increases to seasonal conditions towards the entrance of Carlisle Avenue and to the south of the site, however the areas are suitable for the intended use.

Carlisle Avenue

365. The entrance to Carlisle Avenue from Jewry Street would experience a slight increase to short term conditions underneath the overhang however the conditions are suitable for the intended use.

Rangoon Street

366. There would be no changes to the conditions, which are suitable for intended use.

Entrances at site

367. There would be no changes to the conditions, which are suitable for intended use.

Terraces at site

368. There would be no changes to the conditions from the previous scenario (with no cumulative development), and the terrace would require wind mitigation measures.

Wider surrounding area

369. In the surrounding area, at ground level including bus stops and amenity spaces, there would be all season and seasonal comfort conditions which would be suitable for their intended use.

370. The assessment demonstrates that the roof terrace at 120 Fenchurch would receive more all season conditions in the cumulative scenario therefore represents an improvement.

Proposed development with consented and unconsented surrounding buildings

371. The introduction of unconsented (submitted but not approved) and consented developments in this cumulative scenario results in the following changes.

Jewry Street

372. The introduction of unconsented schemes does not result in much change to previous proposed scenarios and the conditions are considered to be suitable for intended uses.

Carlisle Avenue

373. The entrance to Carlisle Avenue from Jewry Street would experience slightly less seasonal and short term conditions than Configuration '3' (consented only) and the conditions are considered to be suitable for intended uses.

Rangoon Street

374. There would be no changes to the conditions than in previous proposed scenarios, which are suitable for intended use.

Entrances at site

375. There would be no changes to the conditions in existing scenario, which are suitable for intended use.

Terraces at site

376. There would be no changes to the conditions to the previous proposed configurations, which require wind mitigation measures.

Wider surrounding area:

377. In the surrounding area, at ground level including bus stops and amenity spaces, there would be all season and seasonal comfort conditions which would be suitable for their intended use and the unconsented schemes would have little effect on conditions.

378. There would be no material impacts as a result of unconsented schemes to roof and podium level for surrounding areas.

379. The terrace at One America Square experiences some short-term conditions however the existing site (without the Proposed Development) experiences small areas of short term conditions which are not materially different in any of the configurations therefore are not considered to result from the Proposed Development.

Thermal Comfort & Climate Change Effects

380. This analysis was conducted based on the guidelines from the City of London, and is based on recent historic data rather than data that has been adjusted based on forecasted changes to the world's climate. The Assessment states that the localised effects of climate change at the scale around an individual building are challenging to quantify and come with significant uncertainty even within an assumed emissions scenario. Nonetheless, the Assessment has considered climate change effects.

381. At ground level, for the winds predicted to ‘squeeze’ through the overhang to Carlisle Avenue would result in the area would be too cold for a small amount of time during the winter. Therefore although not directly forecast, in the event of ambient wind speed increase, this area may be perceived as too cold more often during the winter, and potentially during the seasons either side. However the assessment notes this may be countered by an increase in temperatures and wind mitigation measures could be employed.

382. For the terraces at Level 14, it has been predicted to be too hot during a small percentage of the summer in the proposed scenario and in the event that ambient temperatures increase, this would occur more frequently. This effect could be countered by stronger winds and/or increases in cloud cover. The proposed landscaping includes a number of trees which would provide shade to occupants and also act to slow wind speeds passing through.

383. A robust maintenance program for the trees would help reduce climate change induced health risks and adjustable shading devices and/or wind screens would also help provide adaptability depending on the changes to the local climate.

Mitigation measures

384. The Assessment recommends mitigation measures for the Level 14 terrace as the area would not be considered thermally comfortable for occupants expected to be spending long periods of time in this area, due to the exposure to south-westerly winds during the windiest season. Therefore wind mitigation measures are recommended including landscaping with trees of at least 3metres and a 1.5metre balustrade.

385. With the proposed mitigation measures, the terrace is expected to have suitable thermal comfort conditions for the intended long term dining use.

Thermal Comfort Conclusion

386. In the proposed and cumulative scenarios, all ground level conditions are suitable for the intended use, and no adverse impacts due to thermal comfort are expected, although there is an increase of seasonal conditions and the introduction of short-term conditions as a result of the development. This applies to all roadways, bus-stops, thoroughfares, building entrances (both existing and proposed), covered walkways and seating areas. For surrounding terrace and

podium level spaces, the majority would experience conditions suitable to their uses.

387. The results demonstrate that all areas except the level 14 terrace would experience thermal comfort conditions suitable for their intended use. Mitigation measures have been recommended to achieve appropriate conditions and a condition is recommended for mitigation measures to be installed on the terrace to ensure safe sitting conditions associated with the hotel restaurant use. All other areas of the 14th floor terrace level of the Proposed Development would have acceptable thermal comfort conditions for the intended long-term dining use.

388. The Assessment has also considered climate change effects and provided details of potential mitigation.

389. Subject to mitigation measures, the development is considered to comply with London Plan Policies D8 and D9 and Draft City Plan 2036 Policy S8.

Noise and Disturbance

390. London Plan Policy D13 requires the proposed development to mitigate noise-generating uses and Policy D14 aims to avoid significant adverse noise impacts on health and quality of life, and Local Plan Policies DM3.5 and DM15.7, seek to ensure that operational noise does not adversely affect neighbours. Policies S1 and HL3 of the Draft City Plan requires that noise does not adversely affect nearby land uses, supporting a healthy and inclusive City.

391. The impact of the proposed development in terms of noise associated with the operational stage would be negligible. The public realm and the roof terrace amenity uses are all appropriate and in keeping with the area. The proposed plant equipment is to be located internally at basement level or on the roof levels located higher on the building.

392. In regard to noise from plant, an acoustic report has been submitted with the application. This indicates that plant could be operated without detrimentally impacting on neighbouring properties in respect of noise and disturbance.

393. The Environmental Health team have been consulted and conditions have been included with the recommendation. This includes a condition to restrict the hours of use for the terrace from 7am – 10pm (Monday to Saturday).

394. The proposed hotel accommodation has the potential to increase pedestrian movements around the site at a range of times and therefore potential for noise and disturbance to neighbouring properties. The applicant has submitted a Hotel Management Plan with the application, the details of which would be secured by the condition. The onsite management, restricting loitering outside the building would ensure any potential disturbance would be mitigated.

395. Overall, subject to conditions, the development should not detrimentally impact on amenity of surrounding properties in respect of noise and disturbance. Therefore, the Proposed Development complies London Plan Policy D13 and D14, Local Plan Policies DM3.5 and DM15.7, and Policies S1 and HL3 of the Draft City Plan.

Air Quality

396. Local Plan Policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan states that London Plan carbon emissions and air quality requirements should be met on sites and Policy HL2 requires all developments to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI1 of the London Plan.

397. The application includes an Air Quality Assessment which includes the likely impact of the proposed development on air quality as a result of the construction and operational phases of the development.

398. The Assessment states the Proposed Development is considered Air Quality Neutral with regards to building emissions, and therefore no mitigation measures are required. However, the proposals are not considered Air Quality Neutral with regards to transport emissions. The development would be car-free and appropriate mitigation measures have been included in the Framework Travel Plan and the development would utilise ASHPs for operation therefore, subject to conditions and obligations, the impacts are considered acceptable.

399. The City's Air Quality Officer has no objections and recommends that a condition is applied requiring the submission and approval of an Air Quality Report to 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 the submitted Air Quality Assessment.

400. Subject to the compliance with conditions, the proposed development would accord with Local Plan Policy CS15, policies HL2 and DE1 of the draft City Plan, policy SI1 of the London Plan which all seek to improve air quality.

Fire Safety

401. Policy D12 of the London Plan seeks to ensure that proposals have been designed to achieve the highest standards of fire safety, embedding these into developments at the earliest possible stage. Policy D5 requires development to incorporate safe and dignified emergency evacuation for all building users with a minimum of one lift per core to be a suitably sized fire evacuation lift.

402. Regulation 7(2) of the Building Regulations (as amended) restricts the use of combustible materials in the external walls of 'relevant buildings' over 18metres, The building is 49metres. At present hotel uses are excluded from the definition of 'relevant buildings'. However, the Government has made changes to the Building Regulations which will come into force on 1st December 2022, and this development would then fall under the definition of a 'relevant building'. This would be relevant for the materials of the external walls of this development. The Applicant has confirmed that the building has been designed to be in accordance with Regulation 7(2) as a 'relevant building'.

403. The application is accompanied by a fire safety statement which demonstrates how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

404. The proposal would provide one evacuation lift as per London Plan Policy.

405. The Health and Safety Executive (HSE) were contacted to ascertain whether formal consultation was required under the Building Safety Bill and it was determined that the application did not fall under the definition of a 'relevant building' for the purposes of Planning Gateway One.

406. The District Surveyors reviewed the submitted Fire Statement and following comments, confirmed there were no objections.

407. A condition is recommended to require the submission of an Accessibility Management Plan which must include details for the evacuation lift, therefore, the proposed development would meet the requirements of Policy D5 and D12 of the London Plan.

Suicide Prevention measures

408. Local Plan policy CS3 requires that security and safety measures are of an appropriate high quality design. Draft City Plan Policy DE5 requires security and safety to be considered. The City recently adopted the 'Preventing Suicide in High Rise Buildings and Structures' Planning Advice Note (2022) which requires suicide prevention and safety measures to be considered and incorporated where necessary.

409. The proposal includes an accessible terrace at Level 14 to the south and north of the roof only, which is associated with the restaurant use.

410. The Applicant has confirmed that the rooftop terrace has been designed in line with the adopted Advice Note. This includes the following suicide prevention measures proposed to be incorporated:

- All balustrading at the roof is 1.5m tall, exceeding the 1.1m required building regulations and the 1.4m suggested by the Planning Advice Note.
- All aspects of the terrace are overlooked by floor-to-ceiling glazing from the restaurant providing clear, unobstructed natural surveillance to all areas. A generous portion of this glazing will also be openable. This would be supplemented by adequate lighting.
- Defensive planting would be located along the majority of the Jewry Street frontage to restrict and deter access and naturally contain publicly accessible areas to the north and south.
- A CCTV system, monitored 24/7 by the operator, will also be in place on the rooftop area.

411. The proposal is considered to comply with Local Plan Policy CS3 and draft City Plan Policy DE5 and the recommendations of the Planning Advice Note.

412. A condition is recommended for details of suicide prevention measures to be submitted and approved by the City prior to occupation of the rooftop restaurant level.

Health Impact Assessment

413. Policy HL9 of the draft 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.

414. The applicants have submitted a Rapid Health Impact Assessment based on the NHS Healthy Urban Development Unit's criteria and toolkit. The proposed development was satisfactorily assessed against 39 criteria relevant to the proposed development and the City of London. The development is expected to result in positive impacts, including through the provision of community uses and public realm improvements. Two categories were assessed as having a potentially negative impact. The remaining are considered to be positive, neutral or impact uncertain.

415. The potential negative impacts identified related to construction impacts such as dust, noise, vibration and odours, and to air pollution caused by traffic (transport emissions will be exceeded). The applicants have outlined mitigation measures to minimise the impacts as much as possible.

416. It is important to note that the proposal includes all-electric strategy and is targeting an air quality neutral benchmark for building emissions.

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

- Implementation of a Delivery and Service Plan (DSP) to ensure sustainable modes and operation of freight;
- Implementation of a Construction Environmental Management Plan (CEMP) including dust, noise and vibration and hours of construction works;
- Implementation of a Construction Logistics Plan (CLP) to minimise the environmental and road traffic related impacts of the demolition and construction;
- Secure local employment and training initiatives via planning obligations;
- An Air Quality and Management Plan to minimise the impact of dust at the construction phase; and

- Requirement for a Hotel Operational Management Plan to minimise noise at the operational stage.

418. Potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and Section 106 obligations.

419. The HIA assessment adequately addresses potential health impacts and therefore the development complies with draft City Plan HL9.

Public Sector Equalities Duty

420. When considering the proposed development, the Public Sector Equality Duty requires City of London to consider how the determination of the application will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.

421. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:-
    - eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under this Act;
    - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
    - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

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

423. 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.

424. The Applicant submitted an Equalities Statement to support the application.

425. This application has been assessed against the Equality Act 2010 and any equality impacts identified.

426. As set out in the submitted Statement of Community Involvement (SCI), the consultation process included a targeted programme, which sought to understand the needs of the local community and identify opportunities for partnership and facilitation particularly in relation to part of the public benefits of the project.

427. The Applicants have held a range of meetings with stakeholders and the following stakeholders are considered to be relevant in the context of the Equalities Act:
    - Local Ward Members and Planning and Transportation Members;
    - Co-Principal at David Game College, Jewry Street;
    - Development Director at Urbanest Student Accommodation, Vine Street;
    - BID Manager at Aldgate Connect BID.

428. Potential impacts of the proposed development on the nearby occupiers identified above have been assessed including the impacts on the uses. Officers do not consider that they would be detrimentally impacted in so far as these spaces become unusable nor would it be considered that there would be disadvantages or material impact on any persons who share a relevant protected characteristic as identified in the Equalities Act 2010.

429. The section on Accessibility and Inclusive Design sets out how the scheme has been designed to be accessible to all. In addition the proposed development has been assessed against Policy GG1 of the London Plan and would be considered to support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.

Human Rights Act 1998

430. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR").

431. Insofar at the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) or right to enjoyment of property (Protocol 1, Article 1) including by causing harm to the amenity of those living in nearby residential properties and

student residential properties, it is the view of officers that such interference is proportionate, in the public interest and strikes a fair balance between the interests of the owner of the site, those living nearby and the community as a whole.

432. As set out above, it is the view of officers that there would be no infringement of Article 8 or Article 1 of Protocol 1 of the ECHR.

CIL and Planning Obligations

433. 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.

434. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City

435. On 1 April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Through MCIL2The Mayor collects funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

436. CIL contributions and City of London Planning obligations are set out below.

Table 8: MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£698,267	£670,337	£27,931

Table 9: City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£397,500	£377,625	£19,875
City Planning Obligations			
Affordable Housing	£265,000	£262,350	£2,650
Local, Training, Skills and Job Brokerage	£159,000	£157,410	£1,590
Carbon Reduction Shortfall (*as designed*) ***Not indexed***	£787,740	£787,740	£0
Section 278 (Evaluation and Design) - *Not indexed*	£50,000	£50,000	£0
S106 Monitoring Charge	£2,500	£0	£2,500
Total liability in accordance with the City of London's policies	**£1,661,740**	**£1,635,125**	**£26,615**

City's Planning Obligations

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

- Highway Reparation and other Highways Obligations (incl. Highways Schedule of Condition Survey, site access, obtaining consents, licences etc.);
- Local Procurement Strategy;
- Local Training, Skills and Job Brokerage Strategy (Demolition & Construction & End Use);
- Delivery and Servicing Management Plan (including Consolidation) including a requirement for reversing servicing

vehicle movements to be overseen by a trained member of the facilities management team;

- Cycling Promotion Plan;
- Construction Monitoring Costs;
- Carbon Offsetting;
- Section S72/278 Agreement (CoL);
- Public Realm (Specification & Management Plan);
- Cultural Implementation Strategy incl. Management and Marketing Plan for the co-working space and a requirement that the co-working space is provided as affordable workspace or community space if an occupier for the co-working space is not confirmed, and confirmation of occupier for coworking space prior to occupation of hotel;
- In respect of the office floorspace obligations to secure that:
    - 10 hours a month of free community use of meeting rooms;
    - 10 hours a month free meeting room hire for nearby education uses (daytime);
    - 10 hours a month of 50% discount rate to hire the podcast studio for local community groups.
    - Podcast studio rental at £35 per hour (RPI);
    - One free hire per month of event space for community groups.
- Television Interference Survey;
- 'Be Seen' Energy Performance Monitoring;
- Wider public realm works to Rangoon Street.

438. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S72/278 agreement.

439. The scope of the s278 agreement may include, but is not limited to, improving crossings and the surrounding footway/carriageway to accommodate increased pedestrian and cyclist movements and the planting of street trees.

<u>Monitoring and Administrative Costs</u>

440. 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.

441. 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

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

Conclusion

443. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan (i.e. the London Plan and 2015 Local Plan) and relevant policies and guidance, SPDs and SPGs, relevant advice including the NPPF, the draft Local Plan and considering all other material considerations.

444. Two objections have been received. An objection from a resident was received on sustainability and aesthetic grounds, and an objection from a nearby educational use has cited rights to light.

445. The scheme would deliver a high-quality development for hotel accommodation with complementary co-working space which would also be utilised for cultural and community uses.

446. The building considers sustainability standards, incorporating climate resilience, targeting BREEAM 'Excellent' and adopting Circular Economy principles and Whole Life Carbon principles. Dedicated areas of planting and greening would be incorporated through urban greening, significantly increasing the biodiversity on site and providing 45 trees at roof level.

447. Whilst there would be a loss of office floorspace on the site, in terms of total permitted floorspace, it would not have an adverse impact on the overall stock of floorspace in the City or prejudice the City's role as an international business and professional centre. The hotel, coworking and community spaces would contribute towards diversifying the City's building stock and land uses, adding vibrancy and activity for seven days per week. This wider range of activity would contribute towards the City Corporation's ambitions for a City of Culture and Commerce and align with the City Corporation's ambitions for a post Covid City. The loss of office accommodation is therefore considered to be acceptable within the provisions of Local Plan policies CS1 and DM1.1 and emerging policy in the draft City Plan.

448. The proposed hotel use would support the primary business function and cultural role of the City and would provide a range of complementary facilities including, an ancillary ground floor café area and a rooftop restaurant, in addition to a small provision of office space. The proposals would contribute to the balance and mix of uses in the immediate locality.

449. In addition, the provision of community and cultural facilities is supported by the Local Plan and would diversify uses in the area.

450. The proposal would result in daylight losses to nearby student residential accommodation beyond that which is recommended by the BRE and therefore is considered to be contrary to part of Local Plan Policy DM11.3 which resists new hotels which result in adverse impacts to amenity of neighbouring occupiers. Losses beyond the BRE guidelines are likely to occur to the education use at 31 Jewry Street, however the existing levels of daylight to the property are relatively low, and electric lighting is likely to be required to all rooms in the existing condition. This proposed development would not be considered to change the way in which the rooms are used as they already rely on electric lighting and so is unlikely to be materially affected.

451. All impacts to permanent residential properties are within BRE guidelines therefore are considered to be negligible.

452. Taking into account the BRE Guidance and the site's location within a dense urban environment, it is considered that the proposal would not result in an unacceptable impact on the existing properties and would not noticeably reduce the daylight and sunlight to nearby dwellings or open spaces to unacceptable levels. As such, the impact on daylight and sunlight as a result of the proposed development is considered to be in accordance with Local Plan Policies DM10.7 and DM21.3, Policy DE8 of the draft City Plan 2036 and London Plan policy D6(d).

453. Overall, it is considered that the proposed hotel use would not prejudice the primary business function of the City; would contribute to the balance and mix of uses in the immediate locality; and would not result in unacceptable adverse impacts on the amenity of neighbouring properties.

454. The design approach to the site would result in a development appropriate in scale, architectural form, innovative use of materials, and quality that would add a level of richness and visual interest to the local townscape, and would contribute to public realm through planters,

seating and footway widening on Jewry Street. The proposals therefore comply Local Plan Policies CS10 and DM10.1, emerging City Plan Policy S8 and DE2, and London Plan D3 and paragraphs 130 and 132 of the NPPF.

455. The proposals have been assessed against Local Plan Policies CS12, DM12.1, draft City Plan 2036 policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs 199-208. There would be no harm to the setting of 31 Jewry Street and the special architectural and historic interest of the building would be preserved. Overall, the proposal would comply with Local Plan Policies listed above.

456. It is considered that the proposal would preserve the special architectural and historic interest and heritage significance and contribution made by the setting of: Church of St Botolph, 10 Trinity Square or the David Game College. There would be no harm to the significance of the Lloyds Avenue Conservation Area.

457. The proposals are considered to accord with S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant NPPF paragraphs 194-208.

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

459. Subject to conditions requiring wind mitigation the proposal would have an acceptable impact on the microclimate on and around the site.

460. The Applicant is proposing on-site servicing with consolidation of deliveries, to be capped at 12 deliveries per day to take place outside of peak times, and would deliver cycle parking in compliance with London Plan standards. All servicing vehicles would be required to reverse into the off-street area in order to exit in a forward gear. This falls short of the requirements in Policy DM16.5 which require servicing areas to facilitate both access and egress in a forward gear. However it is considered that the reversing manoeuvre would however be significantly shorter and safer than the existing situation on Rangoon Street.

461. To facilitate the development, 23 sqm of public highway is proposed to be stopped up. Due to the area of private land proposed to be adopted as highway, there would be a net gain of highway of 15 sqm.

462. The Applicant has revised the original submission following Officer comments which includes changes to design, materiality, massing and an alternative servicing location, and changes have improved the quality of the proposal and reduce environmental impacts to surrounding uses.

463. There are no unacceptable adverse built development, construction or operational impacts anticipated for the proposed development and use, including cumulative impacts, and the recommendation is subject to conditions to mitigate impacts to surrounding uses, including the requirement to provide deconstruction and construction logistics plans, a scheme of protective works, a hotel accommodation management plan, travel management plan and relevant environmental health conditions including relating to noise. It is considered the proposed development complies with Local Plan Policies CS1, DM1.1, DM1.5, DM15.7, DM21.1, DM 21.7, and draft City Plan Policies HL3, S24, and SB1 regarding impact on amenity.

464. It is almost always the case that where major development proposals come forward 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.

465. The Local Planning Authority must determine the application in accordance with the Development Plan unless other material considerations indicate otherwise.

466. The additional material considerations are as follows:
    - Securing a development within the City that would provide land uses which support the diversification, vitality and growth of the City as a world class business destination;
    - Provision of high-quality public realm at ground floor and urban greening at ground and roof level;
    - Securing a development that is environmentally responsible in that it would seek to promote active travel, provide biodiversity and urban greening, target BREEAM ‘Excellent’, reduce carbon emissions and reduce waste;

- The proposed building would result in an aesthetic enhancement to the Jewry Street locality including through the use of high-quality materials and would respond to the contextual height and massing of the site.

467. In this case, the proposals are considered to be in accordance with the development plan as a whole.

468. When taking all matters into consideration, subject to the recommendations of this report it is recommended that planning permission be granted.

APPENDIX A

Background Papers

Application documents

- Existing drawings.
- Application Form completed 23 March 2022.
- CIL form.
- Covering letter prepared by Montagu Evans dated 23.09.2021.
- Outdoor Thermal Comfort Assessment, Rev A dated 16.09.2021.
- MEP Engineering – Ventilation Summary Statement, prepared by Hoare Lea 21/09/2021.
- Boundary House Operator's Management Statement, September 2021.
- Air Quality and Air Quality Neutral Assessment Rev 01, prepared by Hoare Lea dated 16.09.2021
- Statement of Community Involvement, prepared by Field Consulting, September 2021.
- Biodiversity Enhancement and Management Plan Report No: 155671-03 prepared by Middlemarch Environmental, dated September 2021.
- Ground Investigation Report J21197A (Rev 0) prepared by Geotechnical & Environmental Associates Limited dated September 2021.
- Rapid Health Impact Assessment, dated 20 September 2021.
- Sustainable Urban Drainage Statement, Rev P1 prepared by Elliot Wood dated 15.09.2021.
- Flood Risk Assessment, Rev P1 prepared by Elliot Wood dated 15.09.2021.
- Noise Impact Assessment Revision '0' prepared by Scotch Partners, dated 20.08.2021.
- Framework Travel Plan prepared by RGP, September 2021.
- Transport Assessment prepared by RGP, September 2021.
- Heritage, Townscape and Visual Impact Assessment prepared by Montagu Evans, September 2021.
- Carbon Emissions Reporting Spreadsheet submitted 30.09.2021.
- Be Seen Spreadsheet submitted September 2021.
- Appraisals prepared by CBRE, August 2021.
- Equalities Statement prepared Montagu Evans, submitted September 2021.
- Planning Statement prepared by Montagu Evans, September 2021.
- Applicant response to queries prepared by Sheppard Robson, dated 10.12.2021.
- Microclimate Modelling Addendum prepared by RWDI, dated 27.01.2022.

- Transport Assessment Addendum prepared by RGP, January 2022.
- Written Scheme of Investigation for Archaeological Evaluation prepared by MOLA, dated 07.02.2022.
- Applicant response to sustainability queries prepared by Hoare Lea dated 18.02.2022.
- EW Response to Planning comments, prepared by Elliot Wood dated 03.03.2022.
- Addendum Covering Letter prepared by Montagu Evans dated 24.03.2022.
- Design and Access Statement prepared by Sheppard Robson dated 24.03.2022.
- Public realm and landscape Statement prepared by Phil Allen Design dated 22.03.2022.
- Heritage, Townscape and Visual Impact Assessment Addendum prepared by Montagu Evans dated March 2022.
- Archaeological desk-based assessment, prepared by MOLA dated March 2022.
- Transport Assessment Addendum prepared by RGP, dated March 2022.
- Delivering and Servicing Management Plan prepared by RGP, dated March 2022.
- Pedestrian level wind microclimate CFD Assessment prepared by RWDI, dated 18.03.2022.
- Addendum – Thermal Comfort Assessment prepared by RWDI, dated 11.03.2022.
- Daylight, sunlight and overshadowing, light pollution and solar glare report V2 prepared by Point 2, March 2022.
- Sustainability Statement Rev 05 prepared by Hoare Lea dated 18.03.2022.
- Circular Economy Statement Rev 02 prepared by Hoare Lea dated 16.03.2022.
- Second addendum to CBRE report dated August 2021.
- Fire Statement prepared by Trigon dated March 2022.
- Waste Management Plan, RGP, dated March 2022.
- Letter received from Point 2 dated 19.04.2022.
- Construction Management and Logistics Plan prepared by RGP dated May 2022.
- Updated Urban Greening Factor Calculation prepared by Phil Allen Design.
- Letter from Point 2 dated 27.05.2022.
- Embodied carbon option comparison prepared by Elliot Wood, received June 2022.
- Transport Assessment Addendum prepared by RGP, dated May 2022.

- Email from Montagu Evans dated 16.05.2022.
- Email from Montagu Evans dated 15.06.2022.
- Energy Strategy prepared by Hoare Lea dated 01.06.2022.
- Design and access statement addendum prepared by Sheppard Robson dated 06.06.2022.
- Addendum covering letter prepared by Montagu Evans dated 06.06.2022.
- GEA floorspace schedule dated 07.06.2022.
- GIA floorspace schedule dated 14.06.2022.
- Addendum – Wind Microclimate Assessment prepared by RWDI dated 14.06.2022.
- Independent review of daylight, sunlight, overshadowing, solar glare and light pollution assessment, prepared by Delva Patman Redler and dated 16.06.2022.
- Transport Assessment Addendum prepared by RGP, dated June 2022.
- Whole Life Carbon Assessment Rev 03 prepared by Hoare Lea, dated 30.06.2022.
- Commercial, Cultural & Community Strategy, AND, July 2022.
- Updated visuals received 05.07.2022.

Consultation responses

External

- Letter from the London Borough of Southwark dated 17.05.2022.
- Letter from the London Borough of Tower Hamlets dated 25.04.2022 and 22.06.2022.
- Letter from Historic England dated 12.04.2022.
- Emails from Transport for London dated 10.02.2022 and 28.10.2021.
- Emails from Thames Water dated 05.11.2021, 14.04.2022, 14.02.2022 and 24.06.2022.
- Email response from the Health and Safety Executive dated 04.11.2022.
- Letter from Historic England dated 20.10.2021.

Internal

- Memo from Contract and Drainage Service dated 12.10.2022.
- Memos and emails from the Environmental Health team dated 25.10.2022, 05.05.2022, and 31.05.2022.
- Memo from Air Quality Officer dated 01.11.2022, 11.04.2022 and 06.07.2022.
- Memo from Access Adviser dated 11.11.2022, 13.01.2022, 01.04.2022 and 16.06.2022.
- Email from City Public Realm dated 31.01.2022, 15.06.2022 and 17.06.2022.

- Memos from Lead Local Flood Authority dated 27.10.2021, 26.02.2022 and 22.06.2022.
- Memos and emails from District Surveyor dated 09.11.2021, 12.05.2022, 14.06.2022, and 05.07.2022.
- Email from City of London Police dated 12.04.2022, 26.04.2022 and 16.06.2022.
- Email from Cleansing team dated 13.04.2022 and 04.07.2022.
- Transport Planning team comment received 16.06.2022.
- Cleansing team response dated 04.07.2022.

Representations

21.06.2022	Mr Richard Foley
23.04.2022	Mrs Jane Luca
21.04.2022	Mr Leopold Deliss

APPENDIX B

London Plan (2021), Local Plan (2015) and draft City Plan 2036 policies that are most relevant to the consideration of this case are set out below.

London Plan (2021)

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 GG5 (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 GG6 (Increasing efficiency and resilience) states that planning and development must help London to become a more efficient and resilient city.

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 D2 (Infrastructure requirements for sustainable densities) states that the density of development proposals should: 1) consider, and be linked to, the provision of future planned levels of infrastructure rather than existing levels; 2) be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services (including both PTAL and access to local services).

Policy D3 (Optimising site capacity through the design-led approach) states that all development must make the best use of land by following a design-led approach, and proposals should consider form and layout, experience, and quality and character.

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 D13 (Agent of Change) states that development should be manage noise and other potential nuisances.

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 E1 (Offices) explicitly supports increases in the current office stock, noting that "improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development."

Policy E2 (Providing suitable business space) states that Boroughs should seek to "support the provision, and where appropriate, protection of a range of B Use Class business space, in terms of type, use and size, at an appropriate range of rents, to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand." The policy also states that "development proposals for new B Use Class business floorspace greater than 2,500 sqm (gross external area), or a locally determined lower threshold in a local Development Plan Document, should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises."

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

Policy E10 (Visitor Infrastructure) states that “London’s visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure..” and that a “sufficient supply and range of serviced accommodation should be maintained”. It further states: “Within the CAZ, strategically-important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in other parts of the CAZ except wholly residential streets or predominantly residential neighbourhoods (see Policy SD5 Offices, other strategic functions and residential development in the CAZ), and subject to the impact on office space and other strategic functions. Intensification of the provision of serviced accommodation should be resisted where this compromises local amenity or the balance of local land uses.” The Policy states that serviced accommodation should ensure sufficient choice for people who require an accessible bedroom.

Policy E11 (Skills and Opportunities for all) states that “development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate”.

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

Policy HC2 (World Heritage Sites) requires that "development proposals in World Heritage Sites and their settings, including any buffer zones, should

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

Policy HC3 (Strategic and Local Views) states that development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view. Policy HC4 (London View Management Framework) states that "development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places."

Policy 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 HC5 (Supporting London’s culture and creative industries) states that “the continued growth and evolution of London’s diverse cultural facilities and creative industries is supported”.

Policy HC6 (Supporting the night-time economy) states that planning decisions should “promote the night-time economy, where appropriate, particularly in the Central Activities Zone…” and should promote “management of the night-time economy through an integrated approach to planning and licensing, out-of-hours servicing and deliveries, safety and security, and environmental and cleansing services should be supported”.

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 G5 (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 G7 (Trees and woodlands) states that the planting of additional trees should generally be included in new developments.

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 Tl (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 T5 (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) (and T6.2, T6.4, T6.5) 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 Local Plan (2015) 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.

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.

CS2 Facilitate utilities infrastructure

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

DM2.1 Infrastructure provision

1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
b) reasonable gas and water supply considering the need to conserve natural resources;
c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

CS3 Ensure security from crime/terrorism

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

DM3.2 Security measures

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

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

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.

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

a) consulting the City Corporation on all matters relating to servicing;
b) restricting motor vehicle access, where required;
c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

a) the amenity of residents and other noise-sensitive uses;
b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

CS4 Seek planning contributions

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

CS10 Promote high quality environment

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

DM10.1 New development

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

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

DM10.2 Design of green roofs and walls

1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and

their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.

2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

1) To encourage high quality roof gardens and terraces where they do not:

a) immediately overlook residential premises;
b) adversely affect rooflines or roof profiles;
c) result in the loss of historic or locally distinctive roof forms, features or coverings;
d) impact on identified views.

2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

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

a) the predominant use of the space, surrounding buildings and adjacent spaces;
b) connections between spaces and the provision of pleasant walking routes;
c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
j) the use of high quality street furniture to enhance and delineate the public realm;

k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.7 Daylight and sunlight

1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

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

a) inclusive and safe for 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.

CS11 Encourage art, heritage and culture

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

DM11.1 Visitor, Arts and Cultural

1) To resist the loss of existing visitor, arts and cultural facilities unless:

a) replacement facilities are provided on-site or within the vicinity which meet the needs of the City's communities; or
b) they can be delivered from other facilities without leading to or increasing any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on the site; or
c) it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.

2) Proposals resulting in the loss of visitor, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floorspace has been actively marketed as a visitor, arts or cultural facility at reasonable terms.

DM11.3 Hotels

Proposals for new hotel and apart-hotel accommodation will only be permitted where they:

a) do not prejudice the primary business function of the City;
b) are not contrary to policy DM1.1;
c) contribute to the balance and mix of uses in the immediate locality;
d) do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts;
e) provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles and coaches, appropriate to the size and nature of the hotel or apart-hotel;
f) are inclusive, providing at least 10% of hotel rooms to wheelchair-accessible standards;
g) ensure continuing beneficial use for historic buildings, where appropriate.

CS12 Conserve or enhance heritage assets

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

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.

5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.2 Development in conservation areas

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.

2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.

3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.

2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM12.4 Archaeology

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

2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.

3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

CS13 Protect/enhance significant views

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

CS15 Creation of sustainable development

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

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.

2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:

a) BREEAM or Code for Sustainable Homes pre-assessment;
b) an energy statement in line with London Plan requirements;
c) demonstration of climate change resilience measures.

3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

2. For all major development energy assessments must be submitted with the application demonstrating:

a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-

domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;

d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".

2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.

3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

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

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

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.

2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.

3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).

4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.

6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.

2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.

4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM15.8 Contaminated land

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

CS16 Improving transport and travel

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

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:

a) road dangers;
b) pedestrian environment and movement;
c) cycling infrastructure provision;
d) public transport;
e) the street network.

2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

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

a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.

5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

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

2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for

showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.

2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.

2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.

4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

CS17 Minimising and managing waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste

transfer and eliminating reliance on landfill for municipal solid waste (MSW).

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.

2. On-site waste management, through techniques such as recyclate sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

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

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

CS18 Minimise flood risk

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

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

DM18.3 Flood protection and climate

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.

2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

CS19 Improve open space and biodiversity

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

DM19.2 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.

CS21 Protect and provide housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

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.

CS22 Maximise community facilities

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

DM22.1 Social and community facilities

1. To resist the loss of social and community facilities unless:

a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
c) it has been demonstrated that there is no demand for another similar use on site.

2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.

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

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

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

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
HL5 Location and protection of social and community facilities
HL9 Health Impact Assessments
S2 Safe and Secure City
SA1 Crowded Places
SA2 Dispersal Routes
SA3 Designing in security
S3 Housing
HS3 Residential environment
S4 Offices
OF1 Office development
OF2 Protection of Existing Office Floorspace
S6 Culture, Visitors and the Night -time Economy
CV3 Hotels
CV4 Evening and Night-Time Economy
S7 Smart Infrastructure and Utilities
IN1 Infrastructure provision and connection
IN2 Infrastructure Capacity
IN3 Pipe Subways
S8 Design
DE1 Sustainability requirements
DE2 New development
DE3 Public realm
DE4 Pedestrian permeability
DE5 Terraces and Viewing Galleries
DE8 Daylight and sunlight
DE9 Lighting
S9 Vehicular Transport and Servicing
VT1 The impacts of development on transport
VT2 Freight and servicing
VT3 Vehicle Parking
S10 Active travel and healthy streets
AT1 Pedestrian movement
AT2 Active travel including cycling
AT3 Cycle parking
S11 Historic environment
HE1 Managing change to heritage assets
HE2 Ancient monuments and archaeology

HE3 Setting of the Tower of London World Heritage Site
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)
CR4 Flood protection and flood defences
S16 Circular economy and waste
CE1 Zero Waste City
CE2 Sustainable Waste Transport
S27 Planning contributions

APPENDIX C

Methodology for daylight (including radiance), sunlight and overshadowing assessment

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.

Local Plan Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's (BRE) guidelines 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (2022).

Policy DE8: 'Daylight and sunlight' of the Draft City Plan 2036 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards, taking account of the BRE guidelines.

Local Plan Policy DM21.3 seeks to protect the residential environment including daylight and sunlight.

Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations.

Paragraph 3.10.41 of the Local Plan and Policy HS3 of Draft City Plan 2036 states when considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals.

Within the BRE Guidance, it states that the methods of assessment can be applied to non-domestic buildings where the occupants have a reasonable expectation to light. In this case it is Officers' view that the impact to student residential should be considered.

Methods of Assessment

Daylight to Existing Buildings

The BRE guidelines present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing

dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light (such as schools, hotels and hostels):

1. **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.

2. **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.

The BRE Guide recommends compliance with both the VSC and daylight distribution (NSL) guidelines.

<u>Sunlight to Existing Buildings</u>

Sunlight to windows: Annual Probable Sunlight Hours (APSH): 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 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.

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).

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.

Overshadowing

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

Radiance Assessment

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.

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.

Whilst student accommodation is not explicitly discussed within the BRE Guidelines, it is understood that it is common practice is to assign a minimum target of 1% ADF to student rooms (the target for bedrooms), which is considered by officers to be reasonable.

Radiance assessment results are presented as floor plans colour rendered to illustrate the individual daylight factors within room, which range between 0% and 5%. In addition, the average value of the individual daylight factors within a room can be expressed as a 'radiance based' ADF percentage for the room as a whole.

It should be noted that the Radiance Assessment undertaken is not meant to replace the submitted daylight and sunlight assessments, but to provide a further way to illustrate daylight changes within habitable rooms in the neighbouring properties.

Setting Alternative Target Values (including Mirror Massing)

Appendix F of the BRE guidelines provides advice on setting alternative target values for daylight and sunlight. This notes that the numerical target values are purely advisory and different targets may be used based on the characteristics of the proposed development and/or its location.

Alternative targets may be generated from the scale/layout of existing development within the surrounding context or be based on an extant planning permission. The BRE guide provides an example of a narrow mews in an historic city centre where the VSC values derived from the obstruction angle could be used as a target value for development in that street if new development is to match the existing layout.

The guide notes that a similar approach may be adopted in cases where an existing building has windows that are unusually close to the site boundary and taking more than their fair share of light. In that case, to ensure that new development matches the height and proportions of existing buildings, the VSC and APSH targets for the relevant windows could be set to those for a 'mirror-image' building of the same height and size, an equal distance away on the other side of the boundary.

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 as 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. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which is or is not acceptable.

It should be noted that where there are existing low levels of daylight in the baseline figures any change in the measured levels has been generally described in two ways to give a more complete picture. These are:

- Percentage change (10% reduced to 8% = 20% reduction); and
- Actual/Absolute change (10% reduced to 8% = 2% change).

SCHEDULE

APPLICATION: **21/00826/FULMAJ**

Boundary House 7 - 17 Jewry Street London

Demolition of the building and the erection of a basement, ground plus part 14 storey and part six storey building plus plant comprising of a 311 bedroom hotel with a ground floor cafe/bar and roof top restaurant (Use Class C1) and office floorspace (Use Class E) at part ground and part first floor with ancillary community uses, hard and soft landscaping, cycle parking and associated works.

CONDITIONS

1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.

2 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.
REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy T7 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

3 Prior to any stripping-out or demolition of the existing building or building elements, a material audit of the building or elements to be demolished should be submitted to and approved in writing by the Local Planning Authority to understand the value of the building as a material bank, establishing what can be retained and what can be re-used either on-site, in the first instance, re-used off-site or recycled, demonstrating that as little waste as possible is generated. The

development shall be carried out in accordance with the approved details.
REASON: To ensure that the Local Planning Authority can be satisfied that the proposed development will be designed to promote circular economy principles to reduce waste and encourage recycling, reducing impact on virgin resources in accordance with the following policies in the Development Plan and the draft Development Plans: London Plan; GG5, GG6, D3, SI 7, SI 8 - Local Plan; CS17, DM 17.2 - Draft City Plan 2036; S16, CEW 1.These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction start.

4 All Parish Markers and commemorative plaques on the existing building shall be carefully removed prior to demolition commencing, stored for the duration of building works, reinstated and retained for the life of the building on the new building in accordance with detailed specifications including fixing details which shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the works affected thereby.
REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.1.

5 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.

6 Prior to the commencement of development a Demolition and Construction Methodology and Structural Assessment (prepared by a Heritage Accredited Structural Engineer), assessing implications of the demolition and construction phase, as well as any medium and longterm structural and non-structural implications for the London Wall remains at Roman Wall House, including a detailed methodology and specification of works which seek to mitigate any damage, shall be submitted and approved in writing by the Local Planning Authority and

those relevant works carried out in accordance with the approved details.
REASON: In order to safeguard the structure and the special architectural or historic interest of the listed buildings at Roman Wall House in accordance with the following policies of the Local Plan: CS12, DM12.1.

7 Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.
REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

8 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's Standard Benchmark and setting out further opportunities to achieve the GLA's Aspirational Benchmark 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 Page 146 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.

9 Prior to the commencement of development, an assessment of opportunities to improve the energy efficiency from the GLA 'Be Lean' Stage for carbon reduction from the building to futureproof the development for low carbon operation shall is required to be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approve details and the carbon reduction measures outlined shall remain in place for the lifetime of the development.
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. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

10 Prior to the commencement of the development 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.

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

Authority upon request to demonstrate compliance with the 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.

12 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. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme. REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

13 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.

14 Unless otherwise agreed in writing by the Local Planning Authority, archaeological evaluation shall be carried out in accordance with the

'Written Scheme of Investigation', MOLA, dated 07/02/2022, hereby approved, in order to compile archaeological records.
REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.

15 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.

16 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.

17 Prior to the commencement of the development (except demolition), after RIBA Stage 4, a detailed Circular Economy Statement, to include a site waste management plan, 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 end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of the new building elements (and of the interventions in order to distinguish the historic from the new fabric). 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 Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to

construction work commencing in order to establish the extent of recycling and minimised waste from the time that construction start.

18 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.

19 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.

20 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.

21 No development other than demolition shall take place until the detailed design of all wind mitigation measures and a tree planting plan has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species and location, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.
REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

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

REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the 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.

23 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 2 l/s from no more than one outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 84.9m3;
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.

(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.
REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

24 Prior to construction details for water saving features for to reduce water demand, and details for 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.
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

25 Prior to construction, details of opportunities for the provision of openable windows shall be submitted to and approved in writing by the Local Planning Authority. All development pursuant to this permission shall be carried out in accordance with the details approved and retained for the life of the development.
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

26 Prior to construction, an updated Air Quality Neutral Assessment shall be submitted to and approved in writing by the Local Planning

Authority. All development pursuant to this permission shall be carried out in accordance with the details approved and all measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the building.
REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B

27 Prior to commencement of works on the superstructure of the building, revised details of the bicycle storage area shall be submitted to and approved by the Planning Authority. The development shall be carried out in accordance with the approved amended drawings.
REASON: To ensure all cycle parking spaces are fully accessible, in accordance with policies of the development plan in particular policy DM 16.3.

28 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 runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

29 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

a) particulars and samples of the materials to be used on all external faces of the building including GRC columns and soffit, glazed brick tile with grout, finishing corner details, masonry fins, brick columns and spandrel panels, external bleacher steps, benches and planters, window and door frames, upper level surfaces, PCC metal, any tinted glass;
b) details of the proposed new facade(s) including typical details, materiality, dimensions of typical bays, fenestration, rooftop

fenestration and ground floor visitor, cycle, accessible, vehicular entrances;
c) typical details of stonework including expansion joints, fluted column detailing, soffit, 'fins' junctions with the ground and external public seating and planters;
d) details of ground floor elevations including servicing bay door and canopy, back of house UKPN entrance, bleacher steps and planters;
e) details of the flank wall(s) of the proposed new building including lighting, grouting, curved corner details, junction with soffit, pavement and adjoining premises;
f) hand rails and balustrades;
g) details of junctions with adjoining premises, to the public realm pavement;
h) details of the integration of window cleaning and any general equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level;
i) details of plant, ventilation and air-conditioning and ductwork to serve the development;
j) details of all ground level surfaces including materials to be used;
k) details of walkway surfaces including materials to be used;
l) measures to be taken during the period of demolition and construction for the protection of the trees to be retained and details of any pruning of the trees;
m) details of the arrangements for the provision of refuse storage and collection facilities within the curtilage of the site to serve each part of the development.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

30 Before any works thereby affected are begun, details for measures to provide active frontages facing Jewry Street and Carlisle Avenue including window details and for maintaining views into communal and active areas, 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, and shall be maintained for the life of the building.
REASON: To ensure the 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 in accordance with Local Plan Policy DM10.1.

31 All unbuilt surfaces, including amenity terraces, 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, including details of:
(a) Tree planting, public seating and wind mitigation measures;

(b) Irrigation;
(c) Provision for harvesting rainwater run-off from road to supplement irrigation;
(d) Spot heights for ground levels and planters and seating;
(e) Soil;
(f) Planting pit size and construction;
(g) Tree guards;
(h) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development. to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced.
REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

32 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 Prior to the relevant works a final urban greening and biodiversity enhancement strategy shall be submitted to and agreed in writing with 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 Details of the position and size of the green wall(s)/ climber(s), green roof(s) and blue roof(s), the type of planting, the maintenance regime including fire strategy and the contribution of the green roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any such works are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2, and to ensure that the safety of future visitors to the development and surrounding uses through mitigating the risk of fire from the green roof in accordance with draft City Plan Policy S2 and London Plan Policy D12.

35 Notwithstanding the drawings hereby approved, the steps from Rangoon Street to the entrance of the building are hereby not approved, and 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) Full details of the steps from the building entrance from Rangoon Street and corner of Jewry Street including details of the design and layout, tree planting, and the interaction with public highway and building lines; and
b) Full details for accessibility and inclusive design including platform lifts, door furniture, manifestation, handrail design and positioning and contrast nosing for both building entrances.
REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level and highway in accordance with the following policies of the Local Plan: DM10.1, DM10.8, DM16.2.
REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level and highway in accordance with the following policies of the Local Plan: DM10.1, DM10.8, DM16.2.

36 Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semiexternal and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE2 ofthe Draft City Plan 2036.

37 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.

38 Notwithstanding the details shown on the drawings, before any works thereby affected are begun, details of measures to prevent jumping or falling from the development shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be in place prior to occupation and remain in situ for the lifetime of the development.
REASON: In the interests of safety in accordance with the following polices of the draft City Plan 2036: DE2 and DE5.

39 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 food and drinks uses. 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 food and drink 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.

40 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.

41 No cooking shall take place within any hotel uses hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.
REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

42 The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall submitted to and approved in writing by the Local Planning Authority.
REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7

43 (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.

44 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 order to ensure that the generator does not have a detrimental impact on occupiers of residential premises in the area and 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.

45 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.

REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.

46 No later than 3 months after completion of the building and prior to the development being occupied, a post-completion Circular Economy Statement 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 Publication London Plan.

47 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 post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received 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.

48 Within 6 months of completion details of climate change resilience measures 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.

49 A post construction BREEAM assessment demonstrating that a target rating of at least '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.

50 Details of a Hotel Management Plan to ensure the security and safety of visitors and staff at the development, and details for CCTV including for external cycle parking, shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the hotel hereby permitted. The Management Plan must include details for the security arrangements for the publicly accessible spaces. The building facilities shall thereafter be operated in accordance with the approved Security Management Plan (or any amended Security Management Plan as may be varied from time to time by the Local Planning Authority) for the duration of the hotel use.
REASON: To ensure that the development is secure from crime, disorder and terrorism in accordance with the following policy of the Local Plan: CS3.

51 Details of an Operational Management Plan demonstrating the arrangements for management of the building, including food and beverage activities at ground floor and the arrangements for guests that require blue badge car parking spaces and the arrangements for waste collection, shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. The building facilities shall thereafter be operated in accordance with the approved Operational Management Plan (or any amended Management Plan as may be varied from time to time by the Local Planning Authority) for the life of the building.
REASON: To ensure that the development does not have an adverse impact on the amenity of the surrounding uses in accordance with the following policy of the Local Plan: DM11.3

52 No development shall be occupied until confirmation has been provided that either:
-all water network upgrades required to accommodate the additional flows to serve the development have been completed; or
-a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.
REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.

53 Prior to the occupation of any part of the building all exposed flank or party walls must be faced or treated and all surface areas at ground or

upper levels must be laid out, paved, planted, lighted and treated in accordance with details to be approved in writing by the Local Planning Authority before any such works are commenced and all development pursuant to this permission shall be carried out in accordance with the approved details.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

54 Prior to the occupation of any part of the building, the land between the existing building lines and the face of the proposed new building shall be brought up to street level, paved and drained in accordance with details to be submitted to and approved in writing by the Local Planning Authority and shall not be fenced or otherwise enclosed or obstructed.

REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.1, DM10.8, DM16.2.

55 Prior to occupation of the hotel hereby approved an Accessibility Management Plan shall be submitted to and approved by the Local Planning Authority and this should include accessibility details for the publicly accessible spaces and management plan for the evacuation lift. The hotel shall only be operated in accordance with the approved management plan.
REASON: To ensure the hotel provides a fully accessible and inclusive facility in accordance with Policy DM10.8.

56 No live or recorded music that can be heard outside the premises shall be played.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

57 The roof terrace on level 14 hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 07:00 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, DM21.3.

58 No part of the roof areas except those shown as roof terraces on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.
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 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.

60 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

61 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.

62 A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.
REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy T5 cycling, emerging City Plan policy 6.3.24.

63 Unless otherwise agreed in writing by the Local Planning Authority a minimum of 5 showers and 14 lockers shall be provided adjacent to the bicycle parking areas and changing facilities 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 cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.

64 The loading bay doors must be closed at all times when vehicles are loading or unloading.
REASON: To ensure satisfactory arrangements for service delivery vehicles in accordance with the following policies of the Local Plan: DM11.3 and DM16.5.

65 Except as may be approved in writing by the Local Planning Authority the loading and unloading areas at ground floor level must remain ancillary to the use of the building and shall be available at all times for that purpose for the sole use of occupiers thereof and visitors thereto.

REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.

66 Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.

67 Any servicing of the premises during 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 shall only be undertaken within the confines of the dedicated premises loading bay located on Carlisle Avenue. 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.

68 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1

69 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

70 The development must include provision for an evacuation lift.
REASON: To ensure compliance with London Plan Policy D5 regarding accessibility and fire safety.

71 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, as soon as in approved basement plan.

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.

72 Provision shall be made for disabled people to obtain access to the building via the principal entrance without the need to negotiate steps and shall be maintained for the life of the building.
REASON: To ensure that disabled people are able to use the building in accordance with the following policy of the Local Plan: DM10.8

73 A minimum of 10% of the hotel bedrooms within the development shall be wheelchair accessible as set out in the approved details.

REASON: To ensure the hotel provides a fully accessible and inclusive facility in accordance with Policy DM10.8.

74 The areas within the development marked as workspace on the floorplans at ground level hereby approved, shall be used for office purposes within Class E (g) 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 reenacting 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.

75 A further set of doors must be fitted between Jewry Street and the main entrance and this extra set of doors shall be retained for the life of the premises. These doors must not be left open except in an emergency or for maintenance purposes.
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.

76 Unless otherwise approved by the Local Planning Authority, no plant or telecommunications equipment shall be installed on the exterior of the building, including any plan or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1

77 The development shall provide:
456 sq.m (GEA) of office floorspace (Class E).

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

78 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:
6777-SRA-XX-00-DR-A-02001, Rev P04
6777-SRA-XX-00-DR-A-02602, Rev P03
6777-SRA-XX-01-DR-A-02603, Rev P01
6777-SRA-XX-02-DR-A-02604, Rev P01
6777-SRA-XX-02-DR-A-02605, Rev P01
6777-SRA-XX-02-DR-A-02606, Rev P01
6777-SRA-XX-05-DR-A-02607, Rev P01
6777-SRA-XX-05-DR-A-02608, Rev P01
6777-SRA-XX-05-DR-A-02609, Rev P01
6777-SRA-XX-05-DR-A-02601, Rev P01
6777-SRA-XX-05-DR-A-02610, Rev P02
6777-XX-DRZZ-A-02621, Rev P01
6777-XX-DRZZ-A-02622, Rev P01
6777-SRA-XX-00-DR-A-02202, Rev P05
6777-SRA-XX-01-DR-A-02203, Rev P04
6777-SRA-XX-02-DR-A-02204, Rev P04
6777-SRA-XX-02-DR-A-02212, Rev P01
6777-SRA-XX-02-DR-A-02213, Rev P01
6777-SRA-XX-02-DR-A-02213, Rev P04
6777-SRA-XX-02-DR-A-02210, Rev P03
6777-SRA-XX-B1-DR-A-02201, Rev P04
6777-SRA-XX-RF-DR-A-02211, Rev P04
6777-SRA-XX-XX-DR-A-02205, Rev P04
6777-SRA-XX-XX-DR-A-02209, Rev P03
6777-SRA-XX-XX-DR-A-02221, Rev P03
6777-SRA-XX-XX-DR-A-02222, Rev P03
6777-SRA-XX-XX-DR-A-02250, Rev P06
6777-SRA-XX-XX-DR-A-02251, Rev P06
6777-SRA-XX-XX-DR-A-02252, Rev P06
6777-SRA-XX-XX-DR-A-02253, Rev P06
6777-SRA-XX-XX-DR-A-02301, Rev P02
6777-SRA-XX-XX-DR-A-02302, Rev P02
6777-SRA-XX-XX-DR-A-02303, Rev P01
6777-SRA-XX-XX-DR-A-02304, Rev P01.
REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning

INFORMATIVES

1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

-detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

-a full pre application advice service has been offered;

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

2 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.

3 Any building proposal which includes catering facilities will be required to be constructed with adequate grease traps to the satisfaction of Thames Water Utilities Limited or their contractors.

4 The development will require Technical Approval for the extents oversailing the Highway and applicant must agree this with the landowner if not within their site.

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

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:
Office £185 sq.m
Retail £165 sq.m
Hotel £140 sq.m
All other uses £80 per sq.m

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

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

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

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

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

6 Regarding the public realm, the footways should have a footway clear zone of a preferred minimum of 2000mm and an absolute minimum of 1000mm. This is to comply with London Plan's Healthy Streets act.

7 Thames Water advice:

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Thames Water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed online.

There are public sewers crossing or close to your development. If you're planning significant work near Thames Water sewers, it's important that you minimize the risk of damage. Thames Water will need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other

way. The applicant is advised to read the Thames Water guide working near or diverting their pipes.

The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read the Thames Water 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 Thames Water pipes or other structures.

As per Building regulations part H paragraph 2.21, Drainage serving kitchens in commercial hot food premises should be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825-2:2002 or other effective means of grease removal. Thames Water further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Please refer to our website for further information.

There are water mains crossing or close to your development. Please note that Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near Thames Water mains (within 3m), Thames Water will 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 the Thames Water guide working near or diverting their pipes.