

<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	1 November 2022
<b>Subject:</b> Cripplegate House 1 Golden Lane London EC1Y 0RR Alteration and extension of the existing office building (Class Eg(i)) incorporating a local community/cultural space (Class Eg(i)/F2) at ground floor; to include additional floorspace through upward and infill extensions (+2485sq.m GIA uplift); altered and additional entrances; creation of office amenity terraces and plant enclosures; facade alterations including urban greening; new landscaping; and associated works.	<b>Public</b>
<b>Ward:</b> Cripplegate	<b>For Decision</b>
<b>Registered No:</b> 22/00202/FULMAJ	<b>Registered on:</b> 28 March 2022
<b>Conservation Area:</b> N/A	<b>Listed Building:</b> Grade II

### Summary

Planning permission is sought for the refurbishment and extension of the site for 'Alteration and extension of the existing office building (Class Eg(i)) incorporating a local community/cultural space (Class Eg(i)/F2) at ground floor; to include additional floorspace through upward and infill extensions; altered and additional entrances; creation of office amenity terraces and plant enclosures; facade alterations including urban greening; new landscaping; and associated works'.

The proposals include the partial demolition of the west façade, demolition of the north and south facades, a small amount of superstructure, and the roof of 1 Golden Lane, former Cripplegate Institute, to facilitate the comprehensive refurbishment of the Grade II Listed Building. The proposed upwards extension would take the building from 9 storeys to ground plus 12 storeys with lift overrun/plant box. The infill extensions to the north and south elevations would step out the building line. Also proposed are public realm works around the site, in particular to the Golden Lane frontage and Cripplegate Street; terraces at levels 8, 10 and 12 for office amenity; alterations to the Golden Lane façade to introduce level access; and

associated enabling works. The building is currently in use as office (Class E), and proposed is mixed Class E(g) (office) and Class F2 use for cultural and community space.

A total of 331 representations have been received across the two rounds of consultations objecting to the application, including from the Victorian Society and a critique of the design by LB Islington. The grounds of objection relate primarily to the daylight, sunlight and overshadowing impact of the development; impact on residential amenity in terms of overlooking, dominance and loss of outlook; the works to the trees to Golden Lane and Cripplegate Street, design and heritage matters, noise nuisance from the amenity terraces, and the demand for office floorspace. The objections are summarised in a table in the body of the report with responses provided in respect of the various issues raised. 1 representation has been received in support of the application.

The scheme would deliver high quality, flexible, refurbished (Class E) office space (15,471sq.m GIA) and associated ancillary space across all above ground floor levels, which would meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses. The scheme makes optimal use of the site and provides an uplift of approx. 2485sq.m (GIA) of floorspace comprising 2414sq.m of Class E floorspace and 71sq.m of cultural/community Class F2 floorspace. The development has been designed to accommodate new ways of working reflected in flexible and adaptable floorplates which supports post-Covid recovery as identified in the 'London Recharged: Our Vision for London in 2025' report.

The proposed extension, amended throughout the course of the application because of the impact of the originally proposed massing on daylight and sunlight levels to neighbours, would result in a stepped building form that successfully reduces the visual impact of the building mass within the townscape. Overall, it is considered that the proposed development would be an appropriate and sympathetic neighbour not only to the buildings immediately adjacent but also to the wider streetscape.

It is considered the scheme would represent 'Good Growth' by-design, in accordance with the London Plan Good Growth objectives GG1-6, that is growth which is socially, economically, and environmentally inclusive. The proposed development would create a sustainable building with refreshed surrounding streets and spaces. The sustainable retention of the building structure, the quality of the proposed elevations and adaptation of the internal and external spaces at ground floor level are positive and improve the existing

site condition. The proposals seek to break up the block by separating the historic Cripplegate Institute from the modern extension, through a revised architectural approach which allows the historic elevation to remain distinct, whilst delivering new, green, articulated and attractive elevations which respond to the neighbouring buildings on Brackley Street and Viscount Street. The proposals make an effective use of limited land resource and enhance the buildings relationship with the adjacent public realm.

The proposals have been assessed against Local Plan Policies CS 12, DM 12.1 and DM12.3, emerging City Plan policies S11 and HE1, London Plan Policy HC1, S16 (2), S66 (1), and S72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant NPPF paragraphs 199-208. There would be no harm to the setting of the Barbican as a Grade II listed building, nor to the Golden Lane Estate as a Grade II (or II\* in the case of Crescent House) asset. No harm would also be caused to the significance of the Barbican as a Grade II\* Registered Park and Garden, nor to the significance of the Golden Lane Grade II Registered Park and Garden. Likewise, there would be no harm to the Barbican and Golden Lane Estates Conservation Area and its significance. It is considered that the proposal would preserve the settings and heritage significance of these designated heritage assets in line with Local Plan Policies CS 12, DM 12.1, emerging City Plan policies, S11 and, London Plan Policy HC1.

Your officers have concluded that a negligible level of less than substantial harm would be caused to the significance of 1 Golden Lane as a Grade II Listed Building through the interventions to introduce level access into the historic eastern elevation. The NPPF, paragraph 202, requires less than substantial harm to a designated heritage asset be balanced against the public benefits of the development proposal. That balancing exercise is set out in this report. It is the view of Officers that giving great weight to the conservation of this heritage asset, that this harm would be outweighed by the public benefits provided by the scheme including but not limited to the provision of level, inclusive access into the primary building entrance, the provision of high quality, flexible office floorspace, the improvement to the buildings' active frontages, and the public realm enhancement works.

Paragraph 203 of the NPPF provides that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the planning application and that in weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Here, there is no harm to the significance or setting of the Jewin Chapel as a non-designated heritage asset, considering that the setting of the asset is, as existing, primarily that of modern and unassuming buildings. The proposed development would be visible in views of the Chapel looking south from the Golden Lane Estate; however, the proposals would continue to form part of the modern, unassuming backdrop to the Church.

The scheme would deliver public realm enhancements around the island site including introducing an integrated approach to the areas of public highway and private land along Cripplegate Street through the 'filling in' of the service ramp and including integrated artwork along the underside of the Barbican ramp. Subtle lighting to Cripplegate Street in particular would improve the safety and security of this public route which currently feels unsafe and underutilised.

These public spaces would achieve overarching compliance with the Mayor's 'Public London Charter and 'Expanding London's Public Realm: Design Guide' and the City's Public Realm SPD and associated Technical Guidance, secured through the Section 106 and Section 278 agreements. The proposals encourage pedestrian movement, active travel and support health and wellbeing.

A total of 222 long stay (233 including 11 folding bike lockers) and 14 new short stay cycle parking spaces (in addition to the existing 5 Sheffield stands to Golden Lane that would be re-provided) are proposed. The long stay cycle parking would be provided at basement level, along with associated cycling facilities including lockers and showers. The short stay cycle parking would be located within a privately maintained area of public realm on Cripplegate Street. The provision of cycle parking spaces and end of trip facilities would meet the requirements of the London Plan.

Servicing of the building would take place on-street via Brackley and Viscount Streets, as per the existing situation. However, there would be a cap on the numbers of vehicles per day of 17, with deliveries undertaken outside of peak hours and only during the day, and would make use of an off-site consolidation centre. Although the proposals are in non-compliance with policy DM16.5 given that servicing is to be undertaken on-street, it constitutes a significant improvement over the existing situation, where servicing is unregulated and unmanaged.

The building would be designed to high sustainability standards, incorporating a significant element of integrated urban greening, climate resilience, energy efficiency, targeting BREEAM 'Outstanding' and adopting Circular Economy principles.

The development would achieve an overall Urban Greening Factor (UGF) score of 0.301 based on the City of London methodology, meeting the minimum requirements.

A Wind and Microclimate assessment was undertaken on four different scenarios - existing, proposed without landscaping, proposed with landscaping, and proposed cumulative, using Computational Fluid Dynamics (CFD). The results show that conditions following the development would remain both safe and suitable for the intended activities in line with the City of London Comfort Criteria. This is with the exception of the roof terraces at levels 8, 10 and 12 of the Site, where mitigation would be required to ensure that it is suitable for its intended purpose.

A daylight, sunlight and overshadowing assessment, and supplementary radiance assessment have been undertaken to assess the impact on the daylight and sunlight received by neighbouring properties and the direct sunlight received by surrounding external amenity areas. The assessments have been independently reviewed by the BRE; this is included as Appendix D to this report. Whilst there would be some impact on the daylight and sunlight received by neighbouring properties, including within the Barbican complex and Golden Lane Estate, the impacts would generally be in accordance with the BRE guidelines, negligible or minor in nature and acceptable given the densely developed urban nature of the site and surroundings.

There would be some minor and moderate impacts to the recently completed residential properties at The Denizen, which is directly to the north of the application site. The vast majority of these impacts would be to bedrooms, which are generally considered to be less sensitive in this regard. There would be a moderate impact to the daylight received by one living room on the seventh floor of The Denizen. The supplementary radiance-based assessment demonstrates that the appearance of daylight within this living room would remain the same in the existing and proposed scenarios. The surrounding external amenity areas assessed would experience fully BRE compliant alterations in the direct sunlight that they receive. The results of the Light Pollution report show the development would meet the ILP Guidance on obtrusive light.

The building has been designed to take account of its impact on neighbouring residential properties in relation to overlooking through overall reduced glazing ratios (including as a result of the proposed fritted glass) and stepped back terraces with edge planting; the dominance of the building has been reduced through the setback extensions, and overall, any perceived increase in enclosure and loss of outlook is considered acceptable.

Negative impacts during construction would be controlled as far as possible by the implementation of a robust Construction Environmental Management Plan and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment and alongside residential neighbouring properties. Post construction, compliance with planning conditions would minimise any adverse impacts including with restricted hours of use for the terraces.

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

In this case, the proposal is finely balanced and complies with a number of Development Plan policies, including those which relate to the provision of office development in the City, high quality accessible public realm, community facilities and sustainable development. However, it is not compliant with elements of certain Development Plan policies regarding servicing and refuse collection/storage, the impact on the host building as a designated heritage asset, and would cause instances of worsening to daylight and sunlight to neighbouring occupiers to the north. National Planning Practice Guidance advises that conflicts between Development Plan policies adopted at the same time must be considered in the light of all material considerations including local priorities and needs, as guided by the NPPF. Officers consider that overall, the proposal accords with the Development Plan when read as a whole.

It is the view of officers that the proposal complies with the Development Plan when considered as a whole and that other material considerations also indicate that planning permission should be granted as set out in the recommendation and the schedules attached. Subject to the recommendations of this report it is recommended that planning permission and listed building consent be granted.



## **Recommendation**

(1) That planning permission and listed building consent 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 and 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.

(2) 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.

(3) That you agree in principle that the land affected by the building which is currently public highway and land over which the public have right of access may be stopped up to enable the development to proceed and, upon receipt of the formal application, officers be instructed to proceed with arrangements for advertising and (subject to consideration of consultation responses) making of a Stopping-up Order for the area shown marked on the Stopping-up Plan annexed to this report under the delegation arrangements approved by the Court of Common Council.

TOPIC	INFORMATION			
1. SITE PHOTOS / VISUALS			 <p><i>* a proposed CGI</i></p>	
2. HEIGHT	EXISTING		PROPOSED	
	54.830m AOD		67.300m AOD	
3. FLOORSPACE GIA (SQM)	USES		EXISTING	PROPOSED
	Class E (g) (i) Office		13,067sqm	15,471sqm
	Sui Generis Local Community / Cultural		0sqm	71sqm
	TOTAL		13,067sqm	15,542sqm
	TOTAL UPLIFT: 18.3%			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	<ul style="list-style-type: none"> <li>0 (hypothetical approx. 790FTE)</li> </ul>		<ul style="list-style-type: none"> <li>Approx. 1,150FTE</li> </ul>	
5. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	3	Car parking spaces	0
	Accessible car parking	0	Accessible car parking	0
	Cycle long stay	22	Cycle long stay	233 (222 plus 11 folding bike lockers)
	Cycle short stay	0	Cycle short stay	14
	Lockers	0	Lockers	23
	Showers	0	Showers	23
6. HIGHWAY LOSS / GAIN	4.414sq m proposed to be stopped up  LOSS 4.414sqm			



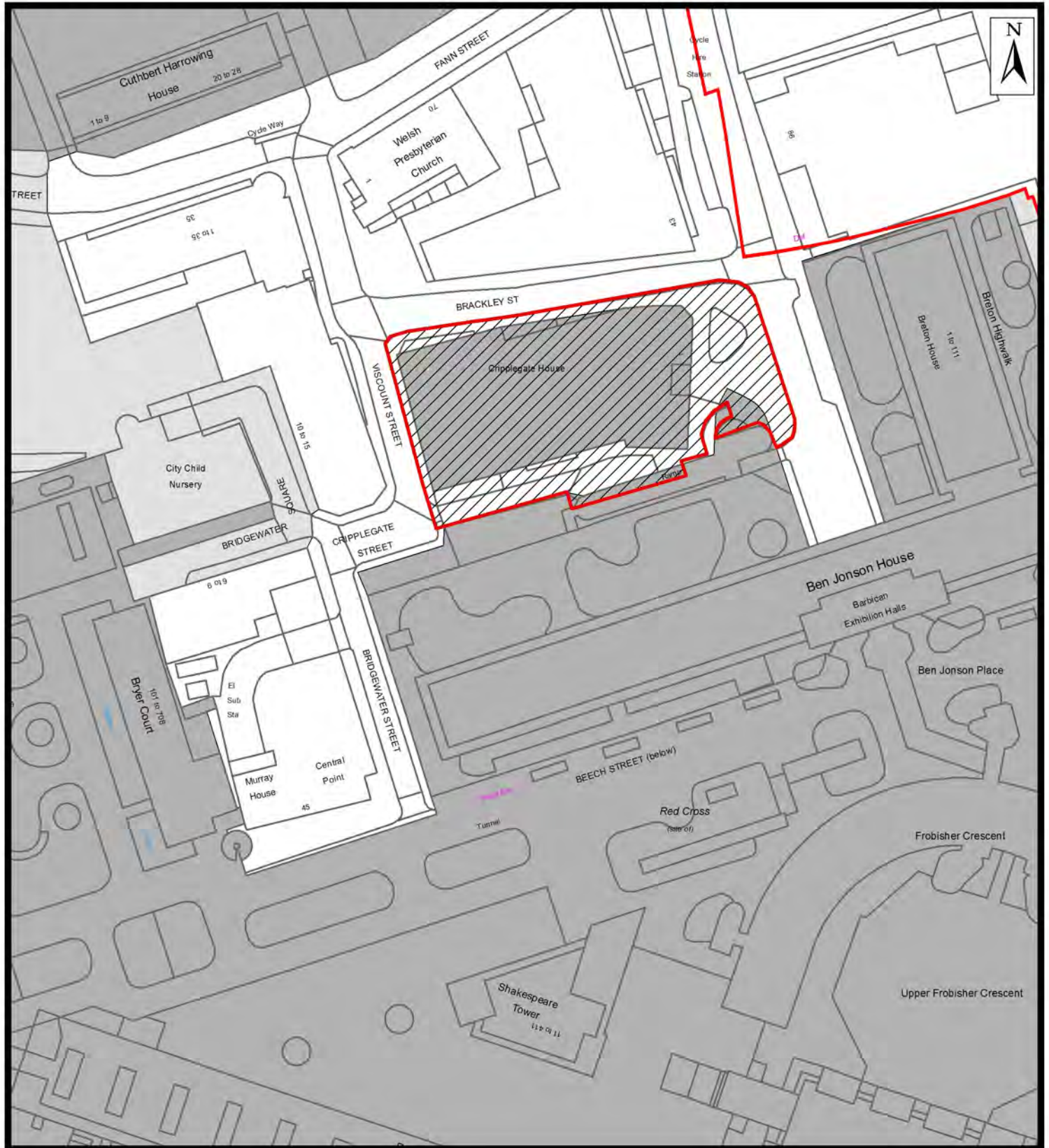
7. PUBLIC REALM GAIN	1.Improvements to Cripplegate Street 2. Improvements to 1 Golden Lane 3. Footway improvements to Brackley Street / Viscount Street.	
8. STREET TREES	EXISTING	PROPOSED
	2no. existing trees to Golden Lane be retained (Lime Street, Hazel Tree). Both to be subject to routine maintenance.  1no Category C Elder tree to be removed.	1no street tree (Silver birch) to be planted.
9. SERVICING VEHICLE TRIPS	EXISTING	PROPOSED
	Estimated 31	Maximum 17 with consolidation
10. VOLUME OF RETAINED FABRIC	<ul style="list-style-type: none"> <li>Structure (substructure and superstructure): 95%</li> <li>Fabric (external envelope inc. walls and roof): 77%</li> <li>Internal assemblies (all internal materials inc. non-load bearing walls, ceilings etc): 40%.</li> </ul>	
11. OPERATIONAL CARBON EMISSION SAVINGS	<ul style="list-style-type: none"> <li>45% improvement against Part L 2013 using SAP 10 carbon factors (policy target 35% improvement) – offset to net zero carbon.</li> </ul> <div>  45% </div>	
12. OPERATIONAL CARBON EMISSIONS	124,733 kgCO2e/annum 8.0 kgCO2e/m2/annum 480 kgCO2e/m2 over 60 years  (covers Module B6 only and includes the decarbonisation of the grid)	
13. EMBODIED CARBON EMISSIONS	PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS	

	<div><div>PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS</div><div><div>WLC Benchmarking by stage (offices)</div><div>kgCO2e/m² GIA</div><table><thead><tr><th>Category</th><th>A1-A5 (exc. Sequestration)</th><th>B-C (excluding B6&amp;B7)</th></tr></thead><tbody><tr><td>WLC benchmark, GLA</td><td>950</td><td>450</td></tr><tr><td>Aspirational WLC Benchmark, GLA</td><td>600</td><td>370</td></tr><tr><td>Proposed development</td><td>487</td><td>313</td></tr></tbody></table></div><div>TOTAL: 12, 661 kgCO2e/60 years</div></div>	Category	A1-A5 (exc. Sequestration)	B-C (excluding B6&B7)	WLC benchmark, GLA	950	450	Aspirational WLC Benchmark, GLA	600	370	Proposed development	487	313
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WLC benchmark, GLA	950	450											
Aspirational WLC Benchmark, GLA	600	370											
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14. WHOLE LIFE CYCLE CARBON EMISSIONS (kgCo2e/m2 GIA)	<div><div>WLC by stage</div><div>kgCO2e/m² GIA</div><table><thead><tr><th>Stage</th><th>Value (kgCO2e/m² GIA)</th></tr></thead><tbody><tr><td>Product and construction A1-A5</td><td>487</td></tr><tr><td>Use B1 - B5</td><td>237</td></tr><tr><td>Op. energy and water B6-B7</td><td>103</td></tr><tr><td>End of Life C1-C4</td><td>76</td></tr></tbody></table></div> <div>TOTAL: 14,275 tonnesCO2eq/60 years</div> <div>(Accounting for decarbonisation of the grid)</div> <div><ul style="list-style-type: none"><li>Outstanding, minimum capability of Excellent (policy target Excellent or Outstanding)</li></ul></div>	Stage	Value (kgCO2e/m² GIA)	Product and construction A1-A5	487	Use B1 - B5	237	Op. energy and water B6-B7	103	End of Life C1-C4	76		
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Product and construction A1-A5	487												
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Op. energy and water B6-B7	103												
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15. TARGET BREEAM RATING	<div><div>G</div><div>VG</div><div>EXC</div><div>OUT</div></div>												
16. URBAN GREENING FACTOR	<div><ul style="list-style-type: none"><li>0.301 (policy target 0.3)</li></ul></div>												
17. DAYLIGHT & SUNLIGHT	<div>BRE Compliance to Ben Jonson House and Breton House, minor adverse impacts to properties in Cobalt Building, Tudor Rose Court, Prior Weston Primary School, Cuthbert Harrowing House, Bowater House and Jewin Chapel that are considered negligible overall. Minor adverse impact to daylight to the Denizen but acceptable in context.</div>												

18. AIR  
QUALITY

- Air Quality Neutral for building emissions. All-electric building in day-to-day operation.

# Site Location Plan



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ADDRESS:  
1 Golden Lane

CASE No.  
22/00202/FULMAJ

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



ENVIRONMENT DEPARTMENT



## Photographs



Image 1: View of existing building from north-east - corner of Golden Lane and Brackley Street





Image 2: View of rear of existing building from north-west – corner of Brackley Street and Viscount Street



Image 3: View of existing building from south-west – taken from Bridgehouse Street showing corner of Viscount Street and Cripplegate Street





Image 4: rear of site from north-west – taken from Fann Street looking towards junction of Brackley and Viscount Streets with Jewin Chapel to left foreground and Tudor Rose Court to right foreground. Barbican at rear.





Image 5: corner of Brackley St and Viscount Street showing 'Denizen' development to north of the Site and Jewin Chapel to far left



Image 6: the Denizen

## **Main Report**

### **Site and Surroundings**

1. The application site is a large island site that sits between Golden Lane (east), Brackley Street (north), Viscount Street (west), and Cripplegate Street (south), in the northern extent of the City, close to the boundary with London Borough of Islington. The site area is approximately 0.24 hectares.
2. The area of the building and immediate land within the ownership boundary is 1593sqm. The building comprises 13,057sq.m (GIA) of office floorspace, and the total existing GEA for the site is 14,148sq.m.
3. The existing building on site comprises basement, ground, and 8 upper storeys plus roof space. It is partially composed of retained elements of Cripplegate House (former Cripplegate Institute) (eastern facade) and a modern extension built in the late 1980s/early 1990s.
4. The site is statutorily listed at Grade II and is surrounded by the Grade II listed Barbican and Golden Lane Estates (n.b. Crescent House within the Golden Lane Estate is Grade II\*). The site is not within a conservation area; however, the Barbican and Golden Lane Estates Conservation Area surrounds the site in all four directions, and in the case of the south, is directly adjacent. The Barbican is also a Grade II\* Registered Park and Garden, with the Barbican Podium behind Ben Jonson and Breton Houses being the closest the registered park and garden gets to the application site. The Golden Lane Estate, slightly further afield, is a Grade II Registered Park and Garden. The Jewin Welsh Presbyterian Chapel (Capeli Cymraeg Llundain) to the north of the site is a non-designated heritage asset.
5. The main entrance to the site is to Golden Lane, through the historic frontage, with a secondary accessible entrance to Brackley Street and a ramp to the basement from Viscount Street. Car parking spaces are provided at basement level accessed via this ramp, but due to restricted head room, servicing (deliveries and refuse collection) for the building is currently undertaken on street.
6. The site is situated within a predominantly residential area with the Barbican Estate to the south and east (Ben Jonson House, circa 34m separation distance from site; Breton House, circa 38m separation distance), Cobalt Building (circa 9m separation) and Tudor Rose Court

(circa 10m separation) to the west, the Denizen (circa 10m separation) to the north. The Golden Lane Estate is to the north-west, a significant distance away. The site is in between/within the rough 'Identified Residential Areas' of the Barbican and Golden Lane within the Local Plan.

7. There are a number of non-residential uses in the area including Bridgewater House (Class E office, south-west), Barbican Exhibition Halls (south), Prior Weston Primary School (north-east), Welsh Presbyterian Church (Jewin Chapel, north) and Bright Horizons Nursery (north-west).
8. Important local green spaces include the Barbican Wildlife Garden and Beech Gardens (north-west, west) that form part of the Barbican and St Alphage Garden SINC (Site of Importance for Nature Conservation, and Fortune Street Park (within LB Islington, north-east). There is also a small pocket park to the north, part of the Denizen.
9. The site has an excellent PTAL rating of 6b, given its proximity to Barbican London Underground Station and Moorgate National Rail and London Underground Station, as well as numerous bus links within the local area.
10. The surrounding highway is all public highway, maintained by the CoL. A small portion of Cripplegate Street is within private ownership.
11. To the front (east) of the site, there are two street trees, one Silver Lime and one Turkish Hazel, managed by City Gardens. There are planters to Golden Lane and Cripplegate Street, the latter includes an Elder tree.
12. The site is within the Culture Mile, which is known for cultural activities and institutions such as the Museum of London, Barbican Centre, and Barbican Exhibition Halls. Policies S23, S24 and SB1 of the draft City Plan 2036 relate.
13. The site is within the North of the City Key Place Area as defined in the Local Plan 2015 and is within the Smithfield and Barbican Key Area of Change as defined by the Draft City Plan 2036.
14. The site does not lay within any LVMF views, nor any views as outlined within the Protected Views SPD 2012.
15. The existing site has an AOD of +57.445m to its highest point.
16. The existing ground level AOD is circa 18m.

## **Proposals**

17. Planning permission is sought for; the removal of the roof of the 1990's extension; removal of majority of the north and south facades (excluding the facades of the historic element); removal of part of the west facade of the 1990's extension and a minor element of the existing superstructure; erection of a 3-storey roof extension; outwards extensions to the north and south; and replacement facade cladding and windows to the west, north, and south. In total, the proposals take the building from 9 storeys to ground plus 12 storeys with lift overrun/plant enclosure. The existing single-storey basement would be retained.
18. The development would provide 15,471sq.m (GIA) of office (Class E(g)) floorspace and associated ancillary office uses, and 71sq.m (GIA) of cultural/community (Class F2) floorspace.
19. The proposals would provide extensive improvements to the public realm, including the 'filling in' of the ramp down to basement level to bring it to grade along Cripplegate Street, and improvements to the public realm around the site including to Golden Lane and Cripplegate Street, and the planting of a new tree and new raised table to the corner of Brackley and Viscount Streets.
20. Works to the heritage facade are also proposed, including replacement windows, introduction of level access into the eastern facade, and general repairs and cleaning.
21. Revisions to the application were submitted in September 2022 following concerns raised by Officers and through the consultation period. The amendments comprised: reduction in overall height of the extension of 930mm, revised massing to the north, revised ground floor design including newly proposed feature window to the north of the heritage facade, the retention of the Turkish Hazel tree to Golden Lane, and further information on suicide prevention and the cultural strategy.
22. The proposals would involve the loss of 1no. Category C Elder tree to Cripplegate Street, the pruning of 1no. Category A Silver Lime tree, and retention of 1no. Category C Turkish Hazel tree to Golden Lane.
23. The height of the proposed development would measure 67.510m AOD to the top of the plant screen.

24. Amenity roof terraces would be provided at levels 8, 10 and 12 for use by the office tenants. The balustrade heights would be at 1100mm with planters added for setbacks. The roof terraces would incorporate significant greening and other landscaping features.
25. The servicing for the development is proposed to be retained on street, as per the existing situation. However, the existing servicing strategy has no controls of hours, numbers or general management of the deliveries and refuse collection. The proposed servicing strategy, on the other hand, would feature use of an off-site consolidation centre, a cap on numbers to 17 deliveries per day, and controlled hours. Servicing would take place on Brackley and Viscount Streets, with the bins stored within the building and brought up for collection through the bin lifts to Viscount Street.
26. Dedicated areas of planting and greening would be incorporated in the development through a combination of soft landscaping, public realm works, and vertical greening through winter gardens.

### **Consultation**

27. The applicants have submitted a Statement of Community Involvement which outlines their engagement with stakeholders. Prior to the application being submitted, between September 2021 and February 2022, the applicant sought to engage with elected Members from the City's Cripplegate Ward, as well as from Aldersgate Ward (City of London) and Bunhill Ward (LB Islington). The applicant also held 17 separate briefings to amenity societies, resident groups, residents in neighbouring buildings, schools, and other local stakeholders. They also dispatched a briefing letter to 1151 homes and businesses, set up a consultation website which has been live since 7<sup>th</sup> December 2021, run a social media advert which had a reach of 9526 people.
28. The response to the pre-application consultation can be summarised as: concerns around the height and massing from a design and heritage and daylight and sunlight impact perspective; the introduction of terraces and the potential for overlooking and noise nuisance; option of refurbishment; servicing strategy; protection of the heritage facade; and construction management, amongst others. There was also concern raised that the questions were leading.
29. Following receipt of the application it has been advertised on site and in the press, with letters sent to neighbouring residential occupiers and neighbouring schools.

30. The application was readvertised using the above methods in September 2022 following receipt of amendments to the scheme.
31. In total, 331 objections were received across the planning and listed building consent applications. 1 letter of support was received.
32. Copies of all received letters and emails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the tables below.
33. The views of other City of London departments have been taken into account in the preparation of this report and some detailed matters remain to be dealt with under conditions and the Section 106 agreement.

<b>Consultation Responses</b>	
Thames Water	No objection with regards foul or surface water, or to water network infrastructure capacity. Condition requested with regards piling method statement related to a strategic sewer.
Officer Response to Comments	The requested condition relating to piling method statement is not recommended; no piling works are to take place as part of the proposed development so the condition would fail to meet the statutory tests.
LB Islington	Due to the excessive height and mass in relation to the site's tertiary position within the urban structure, and its relationship to the host building and multiple adjacent heritage assets, the proposal would harm their settings, their legibility, and the rationale of the urban structure. The proposal is therefore not supported.
Officer Response to comments	See Design and Heritage section of the report.  The assertion that the site holds a tertiary urban structure is refuted; Golden Lane is one of the City's main thoroughfares and the site holds a prominent location on Golden Lane, holding its own in between the larger Barbican Estate to the immediate south. As such, it cannot be said to be tertiary.
Historic England	No comments
Officer response to comments	N/A

Victorian Society	<p>No comment on bulk of proposed extensions given they are to 1990s extension.</p> <p>Objection to the three proposed entrances to the remaining historic part of the building. The extent of previous loss means a large proportion of the significance of the building springs from the architectural value of the remaining historic facades, which still present a relatively rich and dignified late C19 composition.</p> <p>The proposed new entrances will involve the disruption of this composition through the alteration of the main ground floor windows to provide new doorways, which would detract attention from the surviving historic entrance which currently forms a very clear point of access and erode the architectural coherence of the ground floor elevations. The new doorways are also poorly detailed and represent an intrusion of unsympathetic form and materials. Loss of fabric here is a secondary concern.</p> <p>Note the effect of the proposed extension on the significance of the listed building through alterations to its setting. The current extension, although large, is a relatively sympathetic intervention, especially in terms of materiality. The mansard roof is an incongruous addition of the 90s which detracts from the significance of the historic building by distorting its principal elevations; the new roof extensions will tower above this already over-large roof, and cause further harm to significance.</p> <p>Conclude less than substantial harm but suggest that it is nonetheless relatively severe in the context.</p>
Officer Response to Comments	<p>See officer response section at the end of this table.</p> <p>Officers agree that there would be less than substantial harm caused to the significance of the former Cripplegate Institute as a Grade II listed building, but consider this to be negligible. In undertaking the balancing exercise required by paragraph 202 of the NPPF, it is considered that the negligible harm is outweighed by the public benefits of the scheme.</p>
The Gardens Trust	No comment.



Officer response to comments	N/A
London Parks and Gardens Trust	No comment.
Officer response to comments	N/A
Lead Local Flood Authority	No objection in principle, but initial concerns over justification behind not meeting greenfield run off rates, details of proposed blue roof, exceedance routes, and the climate change allowance being included within the SuDS calculations. No concerns following submission of additional information, subject to condition.
Officer response to comments	<p>The applicant responded with justification as to why greenfield run off rates cannot be achieved on site, reasons being; any retrofit of below ground attenuation within the basement would require either significant demolition of the listed structure, including to the piled foundations, or strengthening of the basement slab; limited areas to implement blue roofs due to areas of mechanical plant and imposed loading, to limit imposed loading of storing water in certain areas, and to limit roof build up to not increase massing. The justification is accepted by the Lead Local Flood Authority.</p> <p>With regards exceedance routes, the existing building finished floor level is +17.575m AOD. The road levels surrounding the site vary between +17.750m to +18.200m AOD; however, the building has a stepped entrance and there are no level thresholds. All public footways grade away from the building facade.</p> <p>Finally with regards climate change allowance, it was confirmed that the blue roof calculations have taken a 40% climate change allowance into account; however, it is proposed to reuse rainwater pipes and internal drainage runs as existing, as to do otherwise would result in a higher level of intervention to the listed building.</p> <p>The LLFA's recommended conditions are included within the conditions schedule.</p>

Greater London Authority	No strategic issues.
Officer response to comments	N/A
City of London Department of Markets and Consumer Protection	No objection, recommendation of conditions relating to schemes of protective works, noise and amenity from office terraces.
Officer response to comments	The recommended conditions have been incorporated into the conditions schedule.
City of London Cleansing	The proposed waste storage and collection facilities indicated within the Operational Waste Management Strategy comply with our requirements. The facilities should comply with BS5906 with regards odour and noise.
Officer response to comments	Noted.
City Gardens Manager	<p>Initial objection on loss of Turkish Hazel tree to Golden Lane and of new planters underneath canopy of the lime tree due to increased maintenance from honeydew drop. Following revision to keep the Turkish Hazel, no objection to the application including to the loss of the Elder tree on Cripplegate Street or to the pruning of the Silver Lime on Golden Lane.</p> <p>The viability of the new trees should be assessed through the digging of trial holes. An alternate species should be sought for the new tree to Viscount/Brackley Street corner – birch trees are not considered suitable for climate resilience.</p>
Officer response to comments	Noted. Conditions relating to tree protection and trial holes for new tree viability have been incorporated into the conditions schedule, as well as conditions for full landscaping/planting details including species. The pruning works to the trees shall be carried out by City Gardens and this is to be secured with a financial obligation through the S106 agreement.
City of London Access Officer	The application has been assessed to ensure that the proposal meets the highest standards of accessibility. Initial concerns, including the provision of revolving doors, were partially rectified in the amended scheme. Concerns remain which information/detail is requested in respect of by condition.

Officer response to comments	The recommended conditions have been incorporated into the conditions schedule.
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<b>Representations (Objection)</b>	
Barbican Association	Objection to loss of residential amenity (loss of light, overshadowing, overlooking and light pollution); bulk and massing; impact on Conservation Area.
Officer response to comments	See officer response section at the end of this table.
Golden Lane Estate Residents Association	Objection to bulk and massing; overshadowing/sense of enclosure/overlooking from terraces; waste collection; community workshop not imaginative enough; impact on listed buildings; sustainability impact of removing facades.
Officer response to comments	See officer response section at the end of this table.
Friends of City Gardens	Objection to removal and pruning of public realm trees
Officer response to comments	See officer response section at the end of this table.

Representations Received	Consultation Round (tally)		Response
	1st	2nd	
Waste and Servicing Strategy	20 (+12 under LBC)	7 (+3 under LBC)	See below Officer response and main body of report.
Daylight and Sunlight	92 (+40 under LBC)	29 (+7 under LBC)	See below Officer Response and Daylight and Sunlight section of the main report.
Harm to built heritage (inc. setting of Listed Structures)	67 (+21 under LBC)	27 (+10 under LBC)	See below Officer Response and in Design and Heritage section of the main report.
Harm to listed Barbican Estate	18 (under LBC)	2 (under LBC)	See below Officer Response and in Design and Heritage section of the main report
Harm to listed Golden Lane Estate	13 (under LBC)	1 (under LBC)	See below Officer Response and in Design and Heritage section of the main report
Height/Massing	98 (+45 under LBC)	33 (+13 under LBC)	See Design section of the main report.
Design and materials	10 (under LBC)	4 (under LBC)	See Design section of the main report.
Lack of demand for community space	4 (+5 under LBC)	3	Cultural Plans, which may incorporate community space, are a requirement of all major applications under the Draft City Plan 2036 and in providing the space, the applicant is seeking to confirm with draft policy S6.

Design/Materials	23	7	See Design section of the main report below.
Concerns over demolition/Embedded carbon impact	6 (+3 under LBC)	1 (+1 under LBC)	See Sustainability section of the main report below.
Loss of residential amenity including loss of privacy	70 (+20 under LBC)	13 (+5 under LBC)	See below under Daylight & Sunlight, and Amenity sections of the main report.
Noise (inc. from roof terracing)	61 (+26 under LBC)	14 (+ 5 under LBC)	See below Amenity section of the main report.
Air Pollution	9 (+2 under LBC)	3	See below Air Quality section of the main report.
Light Pollution	19 (+9 under LBC)	0 (+2 under LBC)	See below Light Pollution section of the main report.
Overlooking/Loss of privacy	41	13	See below Officer response and Amenity section of main report
Lack of demand for office space	13	3 (+1 under LBC)	See below Officer response and in Economic Use section of main report.
Harm caused by proposed Viscount Street Entrance	2	2	See Heritage section of the main report.
Loss of ramp to Barbican Podium	2	0	The ramp is not to be demolished and is outside the scope of this application and the ownership of the applicant. An artwork screen is proposed underneath the ramp as part of the indicative public realm works, but this would not be attached to the ramp.

Disturbance from construction	17 (+2 under LBC)	4 (+ 1 under LBC)	Disturbance from construction would be managed as far as practicably possible through conditions relating to Constructions Logistics and Management Plans and a Scheme of Protective Works.
Traffic impact	14 (+2 under LBC)	1	See below Transport section of the main report
Harm to trees	111 (+38 under LBC)	12 (+2 under LBC)	See below Officer response and Trees section of main report.
Harm to local biodiversity	30 (+9 under LBC)	3	See below Trees and UGF section of main report.
Objection to greening strategy/UGF too low	2 (+3 under LBC)	3 (+1 under LBC)	See below under Sustainability section of main report.
Positioning of roof plant	2 (+1 under LBC)	1 (+1 under LBC)	See below under Design and Amenity sections of main report.
Anti—social behaviour from public realm works	0	3	The public realm design is indicative and is to be secured through condition and S278 agreement. Anti-social behaviour will be designed out as far as practicable in the detailed design phase.
Objection to public realm works	0 (+6 under LBC)	2 (+2 under LBC)	See Public Realm section of report.
Impact on views	5 (under LBC)	0	See Design section of report for impact on views. The loss of a

			private view is not a planning matter.
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### **Officer Response to overarching objection points**

The objections primarily raise concern over the following issues:

- The daylight and sunlight impact of the development to neighbouring properties
- The design and its impact on designated heritage assets
- The potential for overlooking/loss of privacy and noise nuisance from the amenity terraces
- The servicing and waste collection strategy
- The proposed works to the trees on Golden Lane and Cripplegate Street
- The proposal does not respond to flexible working patterns and reduced demand for office space.

Taking each comment in turn:

### **Daylight and Sunlight impacts**

The Daylight, Sunlight and Overshadowing impacts of the development have been assessed against the BRE Guidance and planning policy. The proposals have been amended following concern raised by officers and following the initial independent review by the BRE. The massing and therefore Daylight, Sunlight and Overshadowing report produced by Point 2, were amended and reassessed, including a second independent review conducted by the BRE on behalf of the Corporation. The amended proposals would have a minor impact on the daylight and sunlight levels to the property most affected, the Denizen to the north, an improvement over the moderate and major impact previously proposed. In the current and originally submitted iteration of the proposals all other surrounding properties, including those within the Barbican and Golden Lane Estates, Cobalt Building and Tudor Rose Court, would be BRE compliant.

### **Design and heritage impact**

A negligible level of less than substantial harm has been identified to the host property as a result of the lowering of the cills to create new, level entrances into the eastern facade. This has been balanced against the public benefits of the proposals in accordance with the NPPF. No harm has been identified to neighbouring designated and non-designated heritage assets including the neighbouring Conservation Area. The design

of the proposals meets the requirements of Local and London plan policies.

### **Overlooking and noise nuisance to neighbouring properties**

Generally, in City redevelopment schemes, most noise and vibration issues occur during demolition and the early construction phases. Noise and vibration mitigation, including control over working hours and types of equipment to be used, would be included in a Demolition Management Plan and Construction Management Plan to be approved by condition.

While the proposed terraces would result in some overlooking to neighbouring buildings and a small loss of privacy to residents, the positioning and design of the terraces and management restrictions would minimise adverse effects to the amenity of adjacent residential occupiers. Conditions are recommended that restrict hours of access to the terraces, prevents promoted events taking place and prevents the use of amplified music.

### **Servicing and waste collection strategy**

It is acknowledged that the proposals for deliveries and servicing is non-compliant with policy DM16.5 and DM17.1 of the Local Plan, given that no off-street servicing or refuse collection area is proposed. However, the servicing strategy represents an improvement over the existing situation, which does not have restrictions on hours, numbers of vehicles, or any consolidation practices. The City's Cleansing Team have confirmed they are happy with the refuse strategy, but for design and public realm reasons, the bin presentation area is precluded by condition and instead, an alternative location (within the building) and full Waste Management Strategy is required to be submitted.

### **Works to trees**

Following concern raised through public consultation and by officers with regards the removal of the Turkish Hazel tree in particular, the applicant amended the arboricultural/landscaping proposals. The Turkish Hazel to Golden Lane is now proposed to be kept. There was also a misunderstanding of the level of pruning proposed to the Lime tree to Golden Lane; this has been clarified by the applicant and the Category A tree canopy would only be pruned up to 5m above ground. This work would be undertaken by City Gardens, not the applicant. City Gardens raise no objection to the removal of the Category C Elder tree on Cripplegate Street.



## **Flexible working patterns and reduced demand for office space**

The City of London is one of the world's leading international financial and business centres as is set out in the Economic Issues section of this report. This section of the report notes that "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.

London continues to see significant development demand for high-quality office floorspace in strongly performing locations, such as the City.

Central London Forward are due to publish a study (by ARUP) into the future of offices in the CAZ, and we expect this to show a return to positive demand for office floorspace in the coming years, which needs to be planned for.

We are awaiting final publication of long-term employment borough-level projections by GLA Economics, which we expect to show a growth in jobs in the City over the long term, which will translate to positive demand for more office floorspace.

We are in the process of commissioning a study into demand for different types of floorspace, so we should have a clearer picture of this in the coming months. We remain of the view that the City has excellent fundamentals – established businesses, excellent connectivity, potential for growth – and are working hard through the Climate Action Strategy to ensure the City becomes a highly sustainable place to do business, plus making the City an attractive place through our Destination City and related workstreams (e.g. BIDs).

In all, therefore, we're not expecting a substantial drop-off in terms of the need to plan for substantial additional office capacity over the long term. This is in line with the London Plan itself, which asks us to promote and develop the central London office market.

## **Policy Context**

34. 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.

35. 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.
36. 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.
37. There is relevant GLA supplementary planning guidance and other policy in respect of: Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014), Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014), Sustainable Design and Construction (GLA, September 2014), Social Infrastructure GLA May 2015) Culture and Night-Time Economy SPG (GLA, November 2017), London Environment Strategy (GLA, May 2018), Cultural Strategy (GLA, 2018); Mayoral CIL 2 Charging Schedule (April 2019), Central Activities Zone (GLA March 2016), Shaping Neighbourhoods: Character and Context (GLA June 2014); London Planning Statement SPG (May 2014); Mayor's Transport Strategy (2018) and the Culture 2016 strategy.
38. Relevant City Corporation Guidance and SPDs comprises Air Quality SPD (CoL, July 2017), City Lighting Strategy (CoL, October 2018) City Transport Strategy (CoL, May 2019), City Waste Strategy 2013-2020 (CoL, January 2014), City of London's Wind Microclimate Guidelines (CoL, 2019), City of London's Thermal Comfort Guidelines (CoL, 2020), Planning Obligations SPD (CoL, May 2021), Open Space Strategy (CoL, 2016), Office Use (CoL, 2015), City Public Realm (CoL, 2016), Cultural Strategy 2018 – 2022 (CoL, 2018) and relevant Conservation Area Summaries.

### **Considerations**

39. The Corporation, in determining the planning application has the following main statutory duties to perform:-
- to have regard to the provisions of the development plan, so far as material to the application, local finance considerations so far as material to the application, and to any other material considerations. (Section 70 Town & Country Planning Act 1990);

- to determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
40. In considering whether to grant planning permission for development which affects a listed building or its setting, 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). This duty must be given considerable weight and importance when weighing any harm to the setting of a listed building in the balance with other material considerations.
  41. Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that in considering whether to grant listed building consent for any works the local planning authority shall 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.
  42. The National Planning Policy Framework (NPPF) states at paragraph 2 that “Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”.
  43. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social, and environmental.
  44. Paragraph 10 of the NPPF states that “at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:
    - (a) approving development proposals that accord with an up-to-date development plan without delay; or
    - (b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
      - (i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

- (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 45. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
  - (a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
  - (b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
  - (c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
- 46. Paragraph 81 states that decisions should help create the conditions in which businesses can invest, expand, and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 47. Chapter 8 of the NPPF seeks to promote healthy, inclusive, and safe places.
- 48. Paragraph 92 states that planning decisions should aim to achieve healthy, inclusive, and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
- 49. 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”.
- 50. Paragraph 112 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.

51. Paragraph 113 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”.
52. Chapter 12 of the NPPF seeks to achieve well designed places.
53. 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.”
54. Paragraph 130 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.
55. Paragraph 131 of the NPPF states that ‘Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets and tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible..’
56. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.

57. Paragraph 154 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.
58. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment.
59. 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.
60. Paragraph 197 of the NPPF advises, "In determining applications, local planning authorities should take account of:
- (a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - (b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - (c) the desirability of new development making a positive contribution to local character and distinctiveness."
61. 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.
62. Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- (a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
  - (b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

63. 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.
64. Paragraph 203 of the NPPF states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.

### **Considerations in this case**

65. In considering this planning application account has to be taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.
66. The principal issues in considering this application are:
- The extent to which the proposals comply with the development plan
  - The extent to which the proposals comply with the NPPF
  - The appropriateness of the proposed uses
  - The removal and/or pruning of street trees and adequacy of the replacement offer
  - The impact and quality of the architecture and urban design
  - The impact of the proposals on designated and non-designated heritage assets
  - The impact of the proposals on the amenity of nearby residential occupiers including noise, overlooking, daylight, sunlight, and light pollution
  - The accessibility and inclusivity of the development
  - Transport, servicing, cycle parking provision and impact on highways
  - The proposed public realm and quality and value of the cultural offer
  - The impact of the proposal in terms of energy and sustainability
  - The environmental impacts of the proposal including wind microclimate, flood risk, and air quality
  - The outcome of the Health Impact Assessment

- Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010)
- The requirement for financial contributions and other planning obligations.

## **Economic Development and Use**

### **Economic Issues**

67. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
68. 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.
69. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can provide a significant competitive advantage.
70. 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.

71. 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.
72. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2017 London Labour Market Projections and 2017 London Office Policy Review), that City of London employment will grow by 116,000 from 2016 to 2036, of which approximately 103,000 employees are estimated to be office based. London's rapidly growing population will create the demand for more employment and for the space required to accommodate it.
73. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.
74. The London Plan projects future employment growth across London, projecting an increase in City employment. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
75. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
76. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2

further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.

77. The draft City Plan 2036 policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 2,000,000sqm during the period 2016-2036. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.
78. Despite the short-term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic, and social fundamentals underpinning demand remain in place, and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and draft City Plan 2036 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening, and a radical transformation of the City's streets in accordance with these expectations. These aims are reflected in the Corporation's 'Destination City' vision for the Square Mile.
79. Policy CS5 of the Local Plan, referring to the North of the City 'Key City Place' of which the development site forms part, states that the City will; [ensure] the retention and improvement of pedestrian permeability and connectivity, at ground and high walk level through large sites such as... Barbican, Golden Lane... whilst preserving privacy, security and noise abatement for residents and businesses; and [promote] the further improvement of the Barbican area as a cultural quarter of London-wide, national, and international significance.'
80. The scheme meets the aims of policies in the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015 and S4 of the emerging City Plan 2036 in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and employment in line with the aspirations for the CAZ and the requirements of the Local Plan and emerging City Plan. The proposed development would result in an additional 2471 sqm GIA of high quality, flexible Class E Office floorspace for the City, thus contributing to its attractiveness as a world leading international financial and professional services centre.

## **Office provision**

81. Policy E1 of the London Plan (2021) explicitly supports increases in the current office stock. Likewise, core strategic Policy CS1 of the Local Plan 2015 and strategic Policy S4 of the draft City Plan 2036 seek to ensure that the City provides additional office accommodation to meet demand from long term employment growth, and that new office floorspace is designed to be flexible to allow adaptation of space for different types and sizes of occupiers and to meet the needs of SME's, startup companies and those requiring move on accommodation.
82. The existing site provides a total of 13,057sq.m GIA of Class E office floorspace.
83. This application proposes an uplift of 2471sqm GIA of Class E office, which results in a building of 15,471sqm GIA of commercial floorspace. The increase in office floorspace is welcomed in accordance with Core Strategic Policy CS1 to increase the City's stock and S4 of draft submission City Plan 2036.
84. Local Plan 2015 Policy DM1.3 encourages office designs that are flexible and adaptable and meet the needs of small and medium sized businesses. Policy OF1 of Draft City Plan 2036 seeks offices of outstanding design and exemplars of sustainability, designed for future flexibility, which provide office floorspace suitable for a range of occupiers and provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises where appropriate.
85. The proposed floorplates would allow for flexibility through the creation of easily divisible and flexible space, allowing for a range of tenant sizes including small and medium sized businesses in accordance with Local Plan policy DM1.3, and would provide additional high-quality office floorspace, both in terms of design and sustainability credentials.
86. The Proposed Development does not include the delivery of affordable workspace, but the design and size of the floorplates in the building are inherently suitable for SMEs without any sub-division. The building includes floorplates ranging from circa 360sq.m to circa 1210sq.m over 11 floors of office accommodation. The building could therefore accommodate up to 11 SME's if multi-let.
87. The office floorspace is considered to be well-designed, flexible office accommodation in a well-considered and sustainable building, further

consolidating the nationally significant cluster of economic activity in the City and contributing to its attractiveness as a world leading international financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ and supports the aims of the Local Plan policy CS1, and draft City Plan 2036 policy S4. The office accommodation in accordance with policy DM1.3 of the adopted Local Plan and policy OF1 of the Proposed Submission Draft City Plan 2036, would provide flexible office floorplates for workers which are designed to meet the needs of a wide range of potential occupiers.

## **Culture**

88. The site is predominantly surrounded by residential areas of Barbican and Golden Lane Estate and sits within the Culture Mile with close proximity to the historic Smithfield area which is planned to be re-developed with relocation of the Museum of London and potential re-use of the former market buildings, as well as even closer proximity to the Barbican as a world-renowned cultural hub. The proposed scheme therefore is strategically positioned with opportunities for local communities and businesses to engage with the emerging cultural context.
89. Adopted Local Plan policy CS11 seeks to provide, support and further develop a wide range of cultural facilities and events in the City. Policy S6 of the draft City Plan 2036 seeks to enhance cultural experiences and access to a range of arts and heritage and includes a requirement for developers to submit Cultural Plans for major developments outlining how the development will contribute to the enrichment and enhancement of the City's cultural offer. These should set out how the development would contribute towards enriching and enhancing the City's cultural offer for example by incorporating cultural activities or displays in ground floor spaces; facilitating public access and providing exhibitions/interpretation boards in relation to matters of historic interest; providing permanent or temporary space for creative enterprises; and incorporating public art either within the design of the building or as freestanding structures.
90. The existing building itself has a rich cultural history since its inception as a public library through to its use as a theatre. The current building, redeveloped in the 1990s, retains no cultural or community use.
91. The total floorspace of the proposed scheme is 15,542sqm GIA with Class Eg(i) Office and Class Eg(i)/Class F community/cultural provision providing a net increase of 2,485sqm GIA floorspace, out of which cultural space amounts to 71sqm GIA.

92. The Design and Access Statement and subsequent Cultural Strategy document sets out the cultural strategy for the site which builds on the legacy of the Cripplegate Institute. The proposal consists of a dedicated space for cultural and community functions on the ground floor, intended as a 'co-design' space, along with a shared lobby space for organising exhibitions to be accessed from the south-east historic part of the building. In addition, public artwork and murals are proposed along the ramp facade and within the arches on Viscount Street.
93. The Applicant has appointed the cultural placemaking agency FutureCity to engage with stakeholders and local communities. More clarity on the cultural proposals was provided throughout the course of the application. Whilst the document provides a good grounding for the cultural strategy for the site, more information and clarity is required with regards how the cultural space would be set up, managed, operated and used by its end users in the long term.
94. The small amount of floorspace proposed for the cultural space, at 71sqm, is considered insufficient to successfully accommodate the kind of cultural and community activities initially planned for the space. The business plan outlined is also programme dependent and subject to available funding. This raises concerns about the long-term interest and commitment of the potential future occupiers. The Cultural space is proposed as a Cat B fit-out which would be co-designed. Without prior knowledge of the potential occupiers, it is important to build-in flexibility into the space so that occupiers with varied needs and requirements can adapt the space easily.
95. Furthermore, the Cultural space would be operated by a Cultural Operator who would manage bookings through the Barbican booking management system, and would also oversee arrangements with the cultural partners, which include Heritage for London Trust and the Barbican Centre. Another cultural anchor would be appointed to handle day-to-day operations. It is anticipated the space would be occupied throughout the week approximately 50% of the time by the Heritage of London Trust, 40% by the Barbican's community programmes and Barbican Future's programme, and 10% by the POoR Collective. Under the shared services model, the responsibilities would be split between three different entities and there are concerns, as above, about how this space would be used, managed, and maintained.
96. Given the proposal is part of the Culture Mile, there is an opportunity to create a strong cultural anchor which could benefit the surrounding local communities. The applicant has set out an initial plan for the site, giving a

good grounding (despite the small size of the space) to form the basis of a strong Cultural Plan and Cultural Implementation Strategy through Section 106 obligation. Given the small size of the cultural floorspace, the work with local cultural anchors and the local community needs to be extensive, intensive and well thought out. The strategy and implementation plan should set out operational and management details of the space, in addition to how the Applicant would work with local artists and groups to form the basis of the artwork to the Cripplegate Street public realm.

97. Policies CS11 of the 2015 London Plan and S6 of the draft City Plan 2036 seek to 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. Policy S24 seeks to support and enhance the implementation of the Culture Mile.
98. The Cultural Plan, and its intended actions, are welcomed but overall, the content remains weak; full details of the plan and its implementation strategy are to be secured through the S106 agreement to ensure the benefits proposed are delivered.

## **Design, Heritage and Public Realm**

### **Architecture and Urban Design**

#### **Design Evolution**

99. The massing and facade treatment of the proposals has evolved over a series of pre-application meetings and post-application submission feedback to achieve an appropriate massing and complementary architectural backdrop to the local townscape and listed host building.
100. The current scheme addressed, in part, issues raised through consultation with a lowering of the scale of development, sculpting and refining the articulation of the massing, in the most part related to the daylight, sunlight and overshadowing impact of the originally proposed massing on surrounding neighbouring occupiers.
101. The introduction of new public realm and enhanced active frontages would enhance the street scene and amenity of the area through greening, the integration of art and culture and safer, revitalised accessible routes and connections around the site. A more detailed analysis of the design specifics is set out in the following sections of this report.

## Context and Proposals

102. The current building, the former Cripplegate Institute was built circa 1893-6 to designs by Sidney Smith and Frederick Hammond. Finished in red brick and stone, the eastern elevation retains much of its historic character. It has undergone several alterations in its lifetime, including a substantial stretching of the east facade undertaken in the early 20<sup>th</sup> century. The building was also substantially altered as part of an office redevelopment in the 1990s after the Institute moved away from the site in 1973. The facade, entrance hall and stairwell were preserved throughout the mid and late 20<sup>th</sup> century, however, the current dark grey mansard roof was added, creating a heavy and modern top to the historic facade. The current windows are modern replacements and are in poor condition.
103. The fundamental architectural 'move' in redesigning the building would be to slightly expand its footprint to create a more rational relationship with the street building line, and vertically extrude and re-present the poor quality 1990s extension, which had annexed the historic eastern facade of Cripplegate Institute. When viewed from the east and north on Golden Lane and Breton Highwalk, the historic eastern elevation would have additional mass set back from the historic facade.
104. The proposed building would rise to a height of 67.510m AOD. It would comprise twelve floor levels plus a lift overrun/plant box, over the existing single level basement. From the 9<sup>th</sup> floor up, the building would step back on the southern, western, and northern part of the site, reducing the visual bulk of the top three floors in views from Viscount, Brackley and Cripplegate Streets. Above the 13<sup>th</sup> floor, the plant enclosure would be further set back, to minimise its visual prominence.
105. The proposed height increase to the 1990s extension, whilst appearing taller and more assertive in certain views, would be discreet from and make distinct the historic facades as the principal bookend to the city block. Many of these views would be transitory, high level and would be comfortable on the whole. The increased mass would be a stepped, rectilinear extrusion from the top of the sloped, mansard roof to retain a distinction, rather than 'bleeding' with the historic elevations. When viewed from the west, each additional floor on top of the building would step back, successfully minimising the visual impact of the increased mass from ground level.

106. The proposed height of the building would broadly be in line with the prevailing townscape. Lower rise buildings to the north on the Golden Lane Estate are 4 storeys, increasing in height towards the south of Golden Lane and the application site. Immediately north of the site boundary is the Denizen, which is 8 storeys. There is a sharp increase in height to the south of the application site where the tallest architectural landmarks in the area, the Barbican towers, would remain distinct and the pre-eminent features on the local skyline. The proposed development increases the height of the existing building, resulting in the top of the building peeking above the ridge line of neighboring buildings; however, this is not considered to be an uncharacteristic feature of the wider townscape, where building forms and heights are not uniform. The height, bulk, form, and massing are in accordance with policies CS10 and DM10.1.
107. The applicants have pushed the building envelope back in a series of recesses from level 8 to 12, particularly towards the west elevation, and have proposed privately accessible roof terraces at levels 8, 10 and 12 above each of these 'steps'. The stepping back successfully reduces the visual impact of the building mass and substantial rooftop greening softens the edges of the terraces and would improve visual amenity from street level. The arrangement of planting on the periphery of the roof would create a visual buffer and focus gathering space away from the edge of the building; in addition, the location of the planting and balustrade would limit how close the building occupants could stand to the edge of the building to further mitigate the potential overlooking impact on adjacent residential properties, and limit the visual presence of the balustrades. The roof terrace design, which includes these balustrades and plants, is compliant with Local Plan policies, CS10 (part 3), policy DM10.2 and DM10.3.
108. The proposed alterations to the historic, eastern facade are minor in scope and are limited to the removal of sills and the replacement of the existing round headed windows at ground floor level. These alterations are considered to be sensitive to the fabric of the historic facade, largely retaining the original materials and the key architectural features, subject to detail reserved for condition. The addition of doors would open up the building at street level and the community and cafe use would be more prominent and visible on Golden Lane as a result. The junctions between the re-clad 90s structure and the historic facades would be better resolved, subject to detail reserved for condition, so as to create a clear distinction between the two, allowing the historic elevations to better 'bookend' and address Golden Lane. The impact of the interventions to



the eastern facade are discussed in more detail in the Heritage section below.

109. The south, west and north facades of the 90s building have an irregular order of round headed, rectangular and oriel windows arranged and detailed in a pseudo-classical style. Grand feature windows, stretching multiple floors have poor quality design and detailing. Heavy intermediate glazing bars detract from the potential quality of the feature windows. At ground level, the amount of window openings is limited, and the building has a poor relationship with the surrounding public realm as a result.
110. The proposed alterations to the west, south, and north facades seek to enhance the visual appearance of the existing, dated elevations. The 1990s extension to Cripplegate House is of limited architectural merit and is an unexceptional example of postmodern commercial architecture. The consequence of seeking to mimic the materials and style of the former Cripplegate Institute as part of the 1990s scheme has meant a subsuming of the historic building into a whole amorphous city block. The proposal is now seeking to undo this harm.
111. The proposed north and south facades have been designed to have a positive relationship with the historic facade of the Cripplegate Institute. The design seeks to tease apart the extension from the historic building, rather than seeking to imitate and mimic it. The side returns of the revised facades, which sit above the Cripplegate Institute, have been designed to not detract from the historic quality of the Institute, whilst creating a transition between them which is comfortable and respectful to the character of each elevation. The materiality of the uppermost floors complements the existing mansard and helps to mediate between two contrasting forms.
112. The proposed west and north elevations would have a regular order of rectangular windows on the middle portion of the building, finished in white GFRC panels and a glazed curtain walling system. The proposed facades respond to the adjacent context and character of nearby contemporary building such as the Denizen and the Cobalt building, by creating a pattern of fenestration in a similar geometric arrangement. This would ultimately help to reinforce the character of modern development on Brackley Street and Viscount Street.
113. The proposed facade approach represents an increase in the volume of window area across the west and north elevations including the upper extensions, but within the bounds of the existing mass the glazing ratios

would actually decrease. The increase in the overall amount of glazing and the provision of roof terraces would increase the perception of overlooking to neighboring residents, particularly in the Cobalt Building and the Denizen. The proposed glazing, however, would integrate mitigation measures to limit overlooking from the north and west elevations such as vertical fins, greening and fritted glass, integrated into the facade designs. In addition, planters and balustrades on the roof terraces limit how close office occupants can stand to the edge of the terrace, which would limit overlooking from the roof terraces.

114. The south elevation would adopt a slightly different, more open facade approach, where a glazed curtain walling system would be articulated by vertical GFRC fins. Vertical planting on a straining wire would 'green' the elevation. The proposed layering of windows, fins, glazing and greening would create an interesting and articulated facade with a texture and depth, which is absent in the existing elevations.
115. The base of the building on the north, west, and south elevation would be finished in an attractive terrazzo, with punched round headed arches, representing an increase in the number of window openings, enhancing visual permeability into the ground floor of the building. The ground floor design would make a positive response to the public realm by enhancing the provision of public-facing, active, usable, visually interesting and well-lit frontage, which would provide a good level of interest and passive natural surveillance both day and night.
116. The proposed community and cultural space, additional office entrances, increased amount of active frontage and a new cafe would facilitate the diversification of uses and interest on the surrounding streets. The revised ground floor would create level access directly into the community use and cafe, either side of the main staircase and entrance hall. Access to the historic interior from the community and cafe space would be secured via Section 106 and delivered in accordance with the Public London Charter, to ensure the highest level of public access and openness.
117. Secured as part of a Section 106 obligation, the final cultural offer would provide flexible workspace, drawing in a wider audience and demographic to this part of the City, supporting potential startup businesses and sole traders within the Culture Mile. The landscape proposals also include the installation of artwork within the public realm, which is to be secured through the S106 agreement.
118. The proposal would deliver green infrastructure on the facades, rooftop and in the public realm, including a significant focus on optimising the

quantum and planting palette of the terraces in a manner which seeks to improve health and wellbeing, whilst maximising admittance of natural light both inside and out. The proposals would meet the Urban Greening Factor requirement, providing a high level of greening on a constrained site. Final details, including planting palettes, specifications and fit out, are reserved by condition with the intent to optimise the inherent biodiversity and wellbeing benefits.

119. M&E plant and building services would be accommodated on level 9 and on the roof of the building. A large proportion of plant and services are integrated in the basement and on level 9, relieving pressure on the top of the building to accommodate additional plant space. The rooftop plant would be screened from view in accordance with Local Plan Policy DM10.1 and DM 10.3.
120. Appropriate lighting, in accordance with Local Plan Policy DM 10.1, would deliver a sensitive and coordinated lighting strategy integrated into the overall design, minimising light pollution, respecting context and enhancing the unique character of the City by night. A detailed Lighting Strategy would be subject to condition to ensure final detail, including form, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with guidance in the City Lighting Strategy.
121. The proposal would enhance the appearance of the 1990s extension, which is of limited architectural quality. The proposed materials are considered to be high quality and robust, with detailed design elements reserved by condition. In association with the uses, their disposition and layout, and secured via the Cultural Plan Implementation Strategy, the proposal would deliver positive relations between what happens inside the building and outside in the public realm in accordance with London Plan Policy D3 and D8 and Local Plan Policies CS10 and DM10.1.
122. It is considered the scheme would represent 'Good Growth' by-design, in accordance with the London Plan Good Growth objectives GG1-6, that is growth, which is socially, economically, and environmentally inclusive. The proposed development would create a sustainable building with refreshed streets and spaces. The sustainable retention of the building structure, the quality of the proposed elevations and adaptation of the internal and external spaces at ground floor level are positive and improve the existing site condition. The proposals make an effective use of limited land resource and enhance the buildings relationship with the adjacent public realm.

123. The site would increase the provision and quality of office accommodation within the CAZ, it would also increase the amount of office floor space within the Culture Mile, which has a rich tapestry of creative enterprise. A refreshed and re-designed ground floor, with new entrances and community facilities would provide additional amenity to the local community and would make a commensurate contribution to the vibrancy of the Culture Mile.
124. The intention is to deliver a sustainable commercial led scheme by re-skinning the south, west and north elevations of the 1990s building to produce a considered architectural response to both the listed building and the adjacent context. The proposals are sustainable in that they seek to work with the existing structure and upgrade the operational carbon performance of the building. The proposals are in general conformity with Core Strategic Local Plan Policy CS10 (Design).
125. Overall, the proposal would optimise the use of land, delivering high quality office space and community facilities, whilst improving the buildings interface with its surroundings. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. It is considered the proposal would constitute Good Growth by design in accordance with Local Plan Policies CS 10 and DM 10.1, policies contained in the NPPF and guidance in the National Design Guide, contextualized by the London Plan Good Growth objectives, GG1-6.

### **Public Realm**

126. The proposals would transform the public realm around the site. Currently, the existing building has limited active frontages on all sides, providing a very insular building albeit with rich historic expression on the east elevation. Contrastingly, the proposed development would revitalise the public realm at grade around the site, including the existing retained public highway, and the private land above the infilled ramp to be dedicated as permissive path. The public realm works would significantly enhance the locality's permeability, accessibility, and amenity. High quality materials, planting, seating and artwork would feature in the revitalised public realm.
127. In more detail, resurfaced public realm, seating, lighting, rejuvenated planters and urban greening would enhance the quality of routes between Viscount Street and Golden Lane. Enhancements on the junction of Brackley Street and Viscount Street including a shared surface, extended pavement and tree planting, would improve pedestrian priority, inclusivity

and accessibility.

128. The removal of the vehicle access ramp on Cripplegate Street, which is currently unused, would allow for the recreation of a softened landscape where planting and new surface treatments improve visual amenity, by converting what is currently a service yard into an improved route for pedestrians. Cripplegate Street is in part private ownership (the area of the current access ramp), and part public ownership. The S106 and S278 agreement would ensure seamlessness in design, including materials palette and planting, across the ownership boundaries. The space above the access ramp, to be filled in at grade, is to be dedicated as permissive path to allow public use of the space whilst maintaining private ownership and maintenance responsibilities.
129. In addition, the east end of Cripplegate Street, underneath the Barbican access ramp, would be lined with a public art wall with subtle lighting. The arrival experience to the Cripplegate Institute would be improved with the installation of new planters, seating, and landscaping. The proposals would provide more pedestrian-focused streets which promote active travel and are comfortable, convenient, safe, and attractive, in accordance with London Plan Policy D8. Furthermore, a public realm management plan, secured through s.106, would ensure that the enhanced routes and spaces are delivered and maintained in accordance with the principles of the Mayor's Public London Charter.
130. Full details of the ground floor frontages, design and materiality of the public realm improvements and the public realm lighting strategy are reserved for condition to ensure these are well-detailed and can successfully integrate signage, building services, and are useable. The refreshed public realm would comprise a seamless extension of the City's continuous public realm, utilising the material palette and detail established in the City Public Realm SPD and the associated Technical Guide, with final detail reserved by condition.

#### Townscape Views

131. The Townscape, Heritage and Visual Impact Assessment (THVIA) includes a comprehensive assessment of the impacts of the proposal on a range of townscape views. This assessment concludes that the impact on local views is either negligible or minor or a beneficial impact.
132. The building is designed to have a contextual relationship to its wider surroundings whilst maintaining a clear identity of its own. The massing, materials and form of the proposed building have been developed to

ensure that the overall scheme represents an enhancement to the immediate locality. The applicants have undertaken a comprehensive analysis of a series of verified visual montages that demonstrate the above points and illustrate how the building would successfully integrate into the surrounding townscape.

### **Heritage Assets**

133. The application site, Cripplegate House, is listed at Grade II. The site is approximately 50m south of the Golden Lane Estate ("GLE") which is Grade II listed, with the exception of Crescent House, which is Grade II\* listed. The Golden Lane Estate is also a Grade II Registered Park and Garden. Nearby to the south and east are Breton House and Ben Jonson House which form part of the Barbican Estate, listed at Grade II, with associated landscaping which is a Grade II\* Registered Park and Garden. The Jewin Welsh Presbyterian Church is directly north of the application site, and is not listed but is considered to be a non-designated heritage asset.

### **Impact on significance and setting of listed buildings**

#### **Host building, Former Cripplegate Institute – Grade II listed**

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

134. The former Cripplegate Institute was founded 1891 and Cripplegate House was built between 1893-6 by Sidney Smith and Frederick Hammond, who was the St Giles Parish Surveyor at the time. The Cripplegate Institute was built as a grand late-Victorian civic philanthropic venture for the betterment of the working poor of the Cripplegate Ward. The eastern facade of the building is the only remnant of Victorian townscape in the immediate neighbourhood, after much of its context succumbed to substantial bomb damage during WWII.
135. Finished in red brick and stone, the eastern elevation retains much of its historic character. It has undergone several alterations in its lifetime, including a substantial stretching of the east facade undertaken in the early 20<sup>th</sup> century. The building was also substantially altered as part of an office redevelopment in the 1990s after the institute moved away from the site in 1973. The facade, entrance hall and stairwell were preserved throughout the mid and late 20<sup>th</sup> century, however, the current dark grey mansard roof was added, creating a heavy and modern top to the historic facade. The current windows are modern replacements and are in poor condition.

136. The remaining east wing of the former Cripplegate Institute hosts all the remaining heritage significance of the site, despite the whole building being listed. The substantial 1990s office extension on the west portion of the building had a significant impact on the fabric and significance of the listed building, these modern areas are not considered to be of any special interest.
137. The main interest is architectural, which is inherent in the principal east elevation to Golden Lane, and the two short north and south return elevations of the stretched historic facade. Internally, all that survives is an altered and somewhat truncated, surviving staircase from ground to first floor level, the associated landings, balustrades and the decorated ceilings above the historic stair, which is of architectural interest.
138. 1 Golden Lane also has some artistic interest for the carvings which surround the ground floor entrance archway, the entrance hall wall and the ceiling decoration above. In addition, the decorative detailed mouldings to the openings into the oriel windows at second floor level have minor artistic interest. There is limited architectural significance attached to the remaining brickwork of the pavement vaults in the basement. Both the 1990s extensions and the mansard roof make no contribution to the architectural significance of the building.
139. The building has some historic interest derived from its association with the Cripplegate Institute and the cultural activities it used to support. Most notably, the library and its association with Victorian philanthropism, the auditorium and its theatre productions, and the rifle range which gave city workers firearms training during WWII; however, these spaces have since been lost. In addition, the historic eastern elevation also is a scarce example of 19<sup>th</sup> century buildings in the area, significant bomb damage during WWII eviscerated the Victorian townscape, leaving the Cripplegate Institute as an isolated building which predates its neighbours, adding to its historic interest.
140. The setting of Cripplegate House makes a low contribution to its remaining significance. 1 Golden Lane is an isolated remainder of Victorian Cripplegate. It's historic setting, as part of a cohesive Victorian townscape of warehouses, workshops, terraces, alleys, and courts has been lost. In terms of height, architectural form, style, and materials it has little relationship or dialogue with its neighbours.
141. However, its prominent townscape position on Golden Lane assists in allowing an appreciation and understanding of both its architectural interest and historic interest. The setting of 1 Golden Lane supports the

architectural significance of the building through facilitating views of the eastern facade against a backdrop of post-war redevelopment. Its visible location on Golden Lane also supports its historic significance, giving prominence to the former Cripplegate Institute as a survivor of WW2 bomb damage.

#### *Impact Assessment - External*

142. From some fixed and isolated viewing points, the proposed new roofscape appears as visually assertive. This would be transitory and only experienced from specific locations, the additional mass would generally be comfortable from street level and subservient to the historic elevations. When viewed from street level on Golden Lane, a significant proportion of the additional mass would be hidden behind the existing mansard roof. Observers in this location would have to look up almost vertically to read the full extent of the facade, the observers' focus would largely be on the lower floors of the building, where the proposed public realm enhancements would improve the immediate setting of the Cripplegate Institute in views at ground level.
143. In more distant, long-range views, the historic facade is rarely read as a whole. The top of the building would appear in some views, including the northeast corner of Fortune Street Park, however, trees would obscure a large portion of the heritage facade in this view. Where the top of the building is visible on Golden Lane, only small portions of the historic facade are visible.
144. The geometry of the proposed roofscape contrasts with the form of the historic facade, however, this is part of the design intent which seeks to create a positive juxtaposition between historic and modern elements of the building. The top floors are setback which assists in appreciating the historic and modern facades as different entities, whilst the materiality achieves a contiguity which harmonises the modern mansard with what is proposed.
145. The proposals seek to retain the eastern elevation and the historic entrance to the building, where steps from street level take pedestrians into the foyer. Two new openings would be created, either side of the historic entrance, providing level access into the proposed cafe and community space, which are either side of the entrance foyer, these spaces are at grade. This would be achieved by dropping the cills of the existing round headed window frames and by lowering the arched opening on the north elevation. The existing windows are modern, however, there



would be some alteration to the historic facade in removing brickwork, repositioning the stone columns and dropping the cills. The interventions are considered to be sensitive to the fabric of the listed building and are the least intrusive design solution for providing level access into the cafe and community space. Details of the proposed works would be reserved for condition to ensure the detail and execution of these interventions are sensitive. However, some original historic fabric would be lost, resulting in some negligible harm.

#### *Impact Assessment - Internal*

146. The internal alterations comprise refurbishment and fit out of all office spaces. The historic fabric in the interior, namely, the staircase, balustrades, the retained enclosing walls of the staircase, the plaster work in the central entrance hall and the vaults in the basement are retained. The only notable alteration is the creation of a small opening in the first-floor landing which provides level access into the office space. The mouldings on the openings into the oriel window at 2<sup>nd</sup> floor level are proposed to be retained. It is not considered that harm would be caused to the surviving historic interior.

#### *Impact Assessment – Conclusion*

147. The proposed height, bulk and massing of the roof extension would have some impact on setting of the historic facades, albeit one which on balance it is considered would respect and preserve the contribution of setting to the significance of the asset. There is a small loss of fabric associated with the creation of new entrances and the refurbishment of office space, constituting a negligible level of less than substantial harm to the Cripplegate Institute.

#### Golden Lane Estate (Grade II) and Registered Park and Garden (Grade II)

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

148. The Golden Lane Estate is an exemplar postwar housing development by Chamberlain, Powell and Bon. The design of the Golden Lane Estate was the foundation for many of the architectural concepts for post-war housing. This expresses itself on a macro-level through the meticulously planned townscape and generous open landscape and on a micro-level through the architectural design, detailing and layout of both the apartment blocks and the flats within them. It should be viewed in its entirety as an ensemble: a piece of architecture, urban design and townscape. The

qualities of light, space, transparency, function and communality run through the Estate, at both a small and large scale.

149. The design of the Golden Lane Estate and its associations with Chamberlain Powell and Bon add to its significance. The architectural interest of the Golden Lane Estate is derived from the execution of the original design intent, which was a revolutionary departure from the status quo of housebuilding at the time, specifically, the holistically planned rectilinear and ordered blocks, the spaces between them and their interrelationship. The pioneering use of glass curtain walls and the overarching use of a pleasant pink brick all make a significant contribution of architectural interest to the significance of the Golden Lane Estate.
150. The Golden Lane Estate's associations with Chamberlain Powell and Bon, and the historical context in which it was designed comprise the historic interest. The Golden Lane Estate was developed in response to significant WWII bomb damage which sought to attract residents back to the City through the re-imagining the concept urban living. In the words of the architect, the Golden Lane Estate was "inward looking", given its bleak wasteland setting following WWII.
151. There are several aspects of the Golden Lane Estates setting that support its significance. The views from and into the estate are important, as part of its special architectural interest lies in its relationship to adjacent buildings, particularly the nearby Barbican Estate, also designed by Chamberlin, Powell and Bon. From the north, much of the Golden Lane Estate can be viewed with the backdrop of the Barbican towers and its podium composition; reflecting the progression of an architecture practice which established several emerging trends in urbanism, architecture and town planning in the mid-20<sup>th</sup> century. It should be acknowledged that the setting of the Estate has changed significantly since the 1950s, and will continue to change. Cripplegate House, the Peabody Towers, Braithwaite Tower, Blake Tower, the Denizen and 121-167 Roscoe Street are all visible above the perimeter blocks from views within the Estate, placing it in an evolving and dynamic urban context, therefore, the Golden Lane Estate derives limited significance from its setting, aside from its relationship with the Barbican and the Jewin Chapel, as its immediate setting has a varied and contrasting character.
152. It is considered that the following elements of setting make a minor to modest contribution to the overall significance of the Golden Lane Estate:

- The visual relationship with the Barbican to the south; in particular in the north-south axis view from the Bastion through the central piazza towards the tower of the Jewin Chapel and on alignment with the Shakespeare Tower;
- The strong sense of enclosure and unity felt in the sunken gardens, on a whole unfettered by looming development in the immediate vicinity.

#### *Impact assessment*

153. It is considered that the proposed scheme would preserve those positive elements of the setting so as not to adversely impact on the setting or heritage significance of the Golden Lane Estate. It is considered that the boldness, distinctiveness and unity of the GLE as an architectural whole is robust enough to accommodate change in its setting without harm to its essential significance, which is quite in-ward looking.
154. The most noticeable impact of the proposed development on the setting of the Golden Lane Estate would be limited to buildings towards the southern edge of the estate, including, Cuthbert Harrowing House, Bowater House, Great Arthur House and the Golden Lane Community Centre.
155. The proposed development would rise above the main ridge of Bowater and Cuthbert Harrowing House in some views. Where it would, and where it has the potential of affecting their settings, is from the 'piazza' west of Great Arthur House and from the car park to the west of the Community Centre, looking south towards the Jewin Welsh Chapel and Shakespeare Tower. Here, the top of the proposed building would appear above the roof ridges of the Cuthbert Harrowing and Bowater House. The proposed massing would begin to infringe on the silhouette of Shakespeare Tower of the Barbican Estate, but only to a limited degree, and this is not considered to harm the setting of the Golden Lane Estate, as the visual relationship between the Golden Lane Estate and the Barbican Towers is substantially maintained. The existing building is also visible in these views, which reads as modern development beyond the boundaries of the Estate. The Golden Lane Estate would retain its strong sense of enclosure and coherent identity.
156. The roofscape would also be visible, in some views, against the backdrop of the Great Arthur House and the Golden Lane Community Centre, however, the majority of the setting in these views and the proposed scheme would often be masked.

157. Where the proposed scheme would be visible in more open, distant oblique views, the breach of the ridge line would be limited and the bulk would step away from the Golden Lane Estate, such that these views would remain open, and the layout of the estate would still be readily appreciated. The layout of the Golden Lane Estate forms a strong sense of enclosure, allowing an appreciation and understanding of the Estate as an architectural whole. Given the presence created by the enclosure of the estate's buildings, and the significant distance between the listed buildings and the proposed development, it is not considered that the proposal would harm the setting of the Golden Lane Estate.
158. Some views of the Barbican from the north, including from Fortune Street Park and the junction of Fann Street and Brackley Street, would be affected from selective points. There would be intervisibility between Stanley Cohen House, the proposed development and the Barbican complex. There is a gradual inclining height from the Golden Lane Estate towards the Barbican, made up of existing and more modern buildings, which bridges the gap in height between the two. The proposed development would not substantially alter the existing setting of Stanley Cohen house, which already has modern development in close proximity on Golden Lane.
159. The proposed development would read as a continuation of modern development in the periphery of the Golden Lane Estate, which would not substantially alter its setting. Overall, it is considered that the proposed development would preserve the settings of and therefore the special architectural or historic interest and heritage significance of the listed buildings on the Golden Lane Estate and the registered landscape.

#### Barbican Estate (Grade II) and Registered Park and Garden (Grade II\*)

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

160. The Barbican, including the associated Registered Parks and Gardens, is as a leading example of a Modernist project in the high Brutalist style, and is perhaps the seminal example nationally of a comprehensively planned Post-War, mixed-use, Modernist estate, designed by Chamberlin, Powell and Bon.
161. The Barbican Estate and its Registered Park and Garden comprises a series of long slab blocks at a raised podium level, separating pedestrians from vehicular traffic, and a composition of towers which encloses private and public landscaped open spaces centered on a canal in a Le Corbusian

manner. It is of architectural interest for its compelling architectural narrative, which encapsulates both the macro and micro level design intent of Chamberlin, Powell and Bon, in a dramatic arrangement of buildings and spaces which are tied together by a consistent, well detailed, bush and pick hammered concrete finish.

162. The Barbican is also of historical significance, derived from the architects' pursuit of a modern exemplar of high-density urban living during the postwar period.

163. It is necessary to consider the contribution of setting to the significance of the Barbican. The Estate was designed to be like a modern 'fortress', defining its own setting. The Barbican has particular elements of setting which contribute to its significance and can be summarised as follows:

- The planning of the Estate as a complete composition, the placing of the towers with their distinctive silhouettes, the form of, and relationship between, the lower scale housing blocks
- The geometric order of the buildings and spaces, which is a strong feature of the Estate
- An ability to appreciate the Estate from outside through views in, the dominance of the towers and the contrast to the scale of the perimeter blocks
- The formal composition of buildings around a series of spatial 'reservoirs', connected by a series of interlinking highwalks
- The character, urban form, architectural scale, quality and consistency of material fabric, and exterior and interior public spaces.
- The Golden Lane Estate is an important element of the Barbicans setting by virtue of being a neighbouring example of post-war townscape, also designed by Chamberlain Powell and Bon.

164. The building's setting varies greatly around its perimeter, where a varying range of largely of modern buildings, make a mostly neutral contribution to its significance. It is important to consider the scale of the Barbican, its setting covers a vast area comprising several neighbourhoods, each with their own distinct character and identity.

#### *Impact Assessment*

165. The clear juxtaposition between the Golden Lane Estate and 1 Golden

Lane, when viewed in the context of the Barbican tower and podium composition and its relationship to the Golden Lane Estate is important to consider. The proposed development would be slightly visible in views from the north, however, only a minor obscuring of the Barbican Complex would occur. This slight encroachment on the tower, and a slight obscuring of the podium, would allow the Barbican composition to retain its pre-eminence. An appreciation of the Barbican, on approach from the north from Golden Lane, is important, however, the scale of the proposed development is very small in comparison to the scale of the Barbican, therefore, it is considered that the Barbican Estate is robust enough to accommodate this change to its setting without causing harm to the listed building and landscape.

166. The ability of observers to appreciate the formal and geometric composition of landscaped spaces and reservoirs in the Barbican Estate would be preserved. The principal open spaces, including the Lakeside, Water Gardens, Thomas More Gardens and the public space around the entrance of the Barbican Centre would not be affected by the proposals, the proposed massing is not visible in these locations. There are a small number of isolated points towards the periphery of the registered parks and gardens where the proposed building would be visible, including;

- The northwest corner of Beech Gardens, in close proximity to White Lyon Court, when looking east between Bunyan Court and Bryer Court
- The highwalks to the north of Ben Jonson House and the west of Breton House

167. The existing building does not make a contribution to the significance of the Barbican Estate, in addition, the proposed height increase in relation to the scale and generosity of the estate is minimal. Therefore, the proposals would preserve the special architectural and historic interest and the setting of the Barbican Estate and the registered parks and gardens.

### **Impact on Barbican and Golden Lane Conservation Area**

#### *Significance and contribution of setting*

168. The conservation area boundary is tightly drawn around that of the two Estates. As such, the application site is not within the conservation area but, located nearby, forms part of its setting.

169. Overarchingly, the significance of the conservation area can be summarised as the striking juxtaposition between two seminal post-war housing Estates which illustrate evolving trends in architecture, spatial and urban planning, and Modernism in general. The conservation area is defined by its pervasive modernity, by the consistency of modern forms, spaces and finishes throughout, all executed to a very high standard of quality and representing an immersive experience strikingly at odds with the more traditional townscapes and buildings outside the boundary.
170. The immediate setting of the conservation area is characterised by largely modern buildings on redeveloped sites, of differing scales, material treatments and architectural styles. The surrounding street pattern is historic in places but has been subject to much widening or rationalisation. The area between the Estates, just outside the Conservation Area boundary, is described in the adopted Conservation Area SPD (2022) as largely modern and of no special interest, but for two exceptions: the Jewin Chapel and the grade II listed application site; though these are not noted as contributing to the setting of the conservation area, only identified as possessing interest.
171. The setting of the conservation area is therefore considered to be modern, diluted and of no inherent contribution to the significance of the conservation area, which is considered to be neutral. Indeed, the Conservation Area's character and appearance is partly defined by its striking departure from the urban forms found without the boundary.
172. In this context, the application site is considered to make a neutral contribution to the CA significance, having no distinct spatial or aesthetic relationship with either of the two Estates.

### *Impact Assessment*

173. The proposals are considered to have a neutral impact on the setting and therefore the character and appearance of the two Estates. In the various views from within the conservation area, such as, looking south between Cuthbert Harrowing and Bowater House, or north-east from Beech gardens, the new elevations and roof extensions on the building would be perceived as part of the dynamic modern city beyond the estate boundaries. In views of the conservation area from external viewpoints such as Golden Lane and Fortune Street, the proposals would be read as a one element of the modern, unassuming townscape essentially disassociated from the Estates that forms the setting of conservation area.

174. Accordingly, the proposals would result in change to the setting of the conservation area, but not in a manner which would be detrimental to its significance, which would be preserved.

### **Impact on nearby non-designated heritage assets – Jewin Chapel**

#### *Significance and contribution of setting*

175. The Jewin Welsh Presbyterian Chapel is a church of 1956-61 to designs by Caroe and Partners. The building is not listed but is considered to be a non-designated heritage asset.
176. The building's setting is largely of modern and unassuming buildings, making a neutral contribution to its significance, except for the presence of the nearby Golden Lane Estate and the Barbican, which is sympathetic in period and architectural style, and thereby supports the church's architectural significance. The application site is visible in views looking south from the Golden Lane Estate, to the south of the church. It is also prominent in views of the church looking south from within the Golden Lane Estate, looking south along Viscount Street, towards the Barbican.

#### *Impact Assessment*

177. In the north to south views of the Chapel, the new elevations and roofscape of the proposal would continue to provide a backdrop to the church, of increased height and mass. It would therefore be visible above the church's roofline, it is worth noting; however, that the existing building is visible in the backdrop of the Church tower in these views. The proposed massing recesses and steps towards the west to maintain views of Shakespeare Tower, however, the proposed building would clip the silhouette of Shakespeare Tower in some views and slightly impede on the relationship between the Golden Lane Estate, the Chapel and the Barbican, but not to an extent which would impact the setting of the Chapel. The proposed development would continue to form part of the modern, unassuming backdrop the church already possesses in these views.
178. Views of the church looking north, in which it is juxtaposed with the Golden Lane Estate and in which its tower can be read against clear sky, would be unaffected. Therefore, it is considered that the proposals would not adversely affect those elements of the church's setting which contribute to its significance.



## **Conclusion on Heritage Impact**

179. Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).
180. Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. As the statutory duty imposed by section 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged, considerable importance and weight must be given to the desirability of preserving the setting of listed buildings, when carrying out the paragraph 202 NPPF balancing exercise.
181. Paragraph 202 states that 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. NPG, para 020, is clear that public benefits could be any economic, social or environmental objective as prescribed in the NPPF and should be of a nature and scale of benefit to the public at large (i.e., not a private benefit), and which can include heritage benefits.
182. Paragraph 203 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
183. Heritage related policies in the London Plan and the Local Plan seek to conserve and enhance heritage assets.
184. No harm would be caused to the heritage significance, special architectural and historic interest of nearby designated heritage assets, including the Barbican and Golden Lane Estates and the Conservation Area, by reason of an impact on their setting. No harm would be caused to the Jewin Chapel as a non-designated heritage asset, in accordance with paragraph 203 of the NPPF.
185. A negligible level of less than substantial harm would be caused as a

result of the minor alterations to the historic elevations of the Grade II listed Cripplegate Institute, by virtue of the disruption of its historic entrance composition.

186. It is considered that, for the reasons addressed in this report, that there is clear and convincing justification for the above negligible less than substantial harm to the significance of the host building. Even when applying considerable importance and weight to the statutory duty to preserve a designated heritage asset, officers consider that in applying the tests in paragraph 202 of the NPPF this harm would be outweighed by the public benefits of the scheme. A detailed appraisal of the public benefits provided by the scheme is set out in the public benefits section of this report.
187. By virtue of the negligible level of less than substantial harm to the host designated heritage asset, the proposals would conflict with policies CS12 and DM12.1 and DM12.3 of the adopted Local Plan 2015, policies S11 and HE1 of the Draft City Plan 2036, and policy HC1 of the London Plan, which collectively seek to conserve and enhance the significance of heritage assets, taking account of cumulative impacts, seeking to repair, restore and put to viable uses consistent with their conservation. The proposals, however, would comply with these policies in respect of the impact on neighbouring designated and non-designated heritage assets, including with policy DM12.2 with regards the neighbouring conservation area.
188. In all other respects the proposed development would preserve the special interest and settings of designated and non-designated heritage assets in the locality.

### **Access and Inclusivity**

189. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2036 and policy D5 of the London Plan.
190. Cycle storage would be located within the north-west area of the basement level of the site. Access to the cycle spaces would be achieved through level access from Viscount Street. The cycle spaces would be serviced by two lifts from street level, as well as two separate lifts serving

the main floors and principal stairs and escape stairs within the central core of the building.

191. There would be 10 spaces provided for larger accessible cycles which would meet the London Plan requirements of 5% of the total cycle parking provision for such cycles. These would be accessed by the dedicated cycle parking lift access on Viscount Street as above which would have power-automated double doors with minimum 1000mm clear opening with level threshold. It is, however, unfortunate that cycles must share a lift with the bins when being taken in/out for collection.
192. In terms of changing accommodation/end of trip facilities, the changing areas at basement level would include eleven showers within the self-contained changing areas, one of which would be a unisex wheelchair accessible WC/Shower. An ambulant disabled toilet with outward opening door has not been provided and details are requested by way of a condition. Access to the basement would be step free.
193. At ground floor level, alterations to the office entrance design are proposed which would impact the width of the pavement, particularly on either side of the recessed entrance. The stopping up plan (provided at Appendix B) shows that the facade columns on Brackley Street and Viscount Street would extend over the ownership boundary line, and as such the highway would need to be stopped up (to a total of 4.414sq.m). Given the minor amount of stopping up proposed, it is not envisaged that the development would reduce the pavement widths, particularly at the main entrance, to a harmful degree.
194. Sliding drum doors are proposed to the office entrance on Brackley Street, providing level access from street level. This has been negotiated from the revolving doors originally proposed, which are traditionally not an inclusive solution. Therefore, the proposed sliding drum doors are considered satisfactory as they offer the most inclusive approach to the building whilst also accounting for heat loss etc. Level access is proposed on all elevations of the building for the Community and Cultural Workshop entrance, lobby/cafe entrance, cycle entrance and fire escapes, however confirmation by way of a condition is required to confirm that there are no raised thresholds at these entrances.
195. The new internal lobby for the office reception, from the corner of Brackley and Viscount Streets, would incorporate a considered approach for the level change between the street and ground floor level of the building, which would include steps and a ramp integrated to allow users to travel

throughout. Details of these steps and ramp have not been shown on the proposed ground floor plan and are secured via condition.

196. A wheelchair-accessible WC is proposed in the office reception which is welcomed; however, access to this facility may be impeded by its position and close proximity to the security gates. A condition to show that access to this facility would not be impeded by the security gates is recommended. A wheelchair-accessible WC is not, however, proposed within the lobby/cafe, and this is to be secured via condition. If this is not possible, further justification for the reduction of WC facilities within the Community and Cultural Workshop is required.
197. Currently, the transfer direction of the wheelchair-accessible WC's does not alternate between floors. Right-hand transfer facilities are only proposed in the Basement and on Levels 1, 10 and 12. A condition to require details of the incorporation of alternate transfer facilities on all levels is recommended.
198. The external amenity terraces proposed would be fully accessible for wheelchair users, with a firm and even surface within the landscaping/planting layout and wide circulation routes. Conditions requiring details of the landscaping for the terrace are recommended, and should include full details on paving materials, layout and seating designs for assessment against accessibility and inclusivity standards and best practice.
199. Safe, efficient egress depends upon a combination of management procedures and building design. Fire exits are proposed on Brackley Street and Golden Lane. Stepped access, however, is proposed on the fire escape corridor between the refuge and lift. Further details to justify why this has been introduced and what are the proposed means of evacuation for people who cannot manage steps would be secured via a condition.
200. Overall, the proposal accords with the access policies outlined above. The step-free access into the site on all the entrances is a great benefit towards an inclusive City for all and is welcomed as part of the proposals.

## **Transport and Highways**

### **Public Transport and principle of development**

201. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B. The site has numerous bus routes within easy walking distance and is located within a 6-minute walk of Barbican London Underground Station as well as being within a 10-minute walk of Moorgate rail and underground services. Accordingly, the site is considered suitable in principle for the proposed type and scale of development.

### **Cycling**

202. The London Plan Policy T5 (Cycling) requires cycle parking be provided at least in accordance with the minimum requirements published in the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.
203. The level of cycle parking proposed as part of the development is compliant with the London Plan requirements, shown in the table below. It is welcomed that the proposals include cycle parking to meet the requirements of the entire site and not just the uplift in floorspace.

London Plan long stay cycle parking requirements	Proposed long stay cycle parking	London Plan short stay cycle parking requirements	Proposed short stay cycle parking
222	222 (233 incl. 11 no. folding bike lockers)	11	14

204. The long stay cycle parking is proposed at basement level with access available via two lifts from a new cycle entrance on the Viscount Street frontage. All spaces would be easily accessible, and the lifts are sufficient in size to accommodate more than one bike without the need for them to be lifted up and down. A mix of stands would be provided including ground-based Sheffield stands which would ensure the storage is attractive and easy to use for a range of different bikes and potential users of this facility.

205. Five percent of the space would be able to accommodate adapted cycles in accordance with London Plan Policy T5, London Cycling Design Standards 8.2.1, and the draft City Plan 2036 6.3.24.
206. The proposals include showers and lockers in line with the London Plan policy requirements (10.5.7) which seek a minimum of 2 lockers per 3 long-stay space, and at least 1 shower per 10 long-stay spaces.
207. 14no. short stay cycle parking spaces (7no Sheffield stands) are proposed within privately maintained areas of landscaping on Cripplegate Street. These would be positioned away from the existing areas of Public Highway on this frontage and would ensure compliance with the London Plan standards for the levels of floorspace proposed. The 5no. existing Sheffield stands on the Golden Lane frontage of the site would also be re-provided as part of the wider landscaping proposals. The exact location of the cycle parking would be agreed as part of the public realm design via condition for the private areas of land and via S278 agreement for the areas of public highway.
208. The applicant would be responsible for promoting the use of cycle parking spaces and as such would be required by Section 106 obligation to produce a Cycling Promotion Plan, which is a cycling focused Travel Plan. It would be submitted to the City for approval in line with London Plan policy T4 (Assessing and mitigating transport impacts).

### **Servicing and deliveries**

209. 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.
210. As existing, the site does not have any off-street servicing facilities with all servicing activity taking place at kerbside using the loading opportunities along the Brackley Street and Viscount Street frontages. Servicing activity for the site is currently uncontrolled with no restriction on how or when this activity is undertaken.
211. The proposal seeks to continue servicing the site from kerbside given the impracticability of introducing a new off-street servicing area into the existing building as a result of the retention of a significant level of the existing structure. The applicant has explored a range of options for

servicing off-street, however, due to the constraints of the site and given the context of the proposals it is accepted that these would not be practicable.

212. The applicant has submitted a draft Delivery and Servicing Plan which commits to the consolidation of deliveries to the site using an off-site consolidation centre. It is considered a reasonable assumption that the use of an off-site consolidation centre can reduce the number of deliveries by 50% and, applying this figure to the expected level of trips, the proposals would result in a maximum of 17 deliveries per day. As existing, the site has a daily requirement for 31 vehicles and the proposals would therefore represent a significant reduction in overall servicing activity and movement taking place on the Local Highway network. A cap on the total deliveries per day to a maximum of 17 would be required within the S106 agreement.
213. The proposals include changes to the existing on-street parking designations around the site to include an optimised layout for servicing activity to take place along the site frontage on Brackley Street and this would involve the relocation of two existing Pay and display bays which would be secured as part of the wider S278 agreement.
214. The draft City Plan 2036 Policy VT2 requires delivery to and servicing of new developments to take place outside peak hours (07:00-10:00, 12:00-14:00, and 16:00-19:00 on weekdays) and requires justification where deliveries within peak hours are considered necessary. The applicant has agreed to a cap of no more than two deliveries between 07:00 and 08:00 (for fresh produce delivery), with no other servicing at peak times 07:00-10:00, 12:00-14:00, and 16:00-19:00, in line with the City of London Transport Strategy. Further, as under paragraph 386 below, servicing of the site is also restricted between 23:00 and 07:00 each weekday given the surrounding residential context. Cargo bikes would be permitted to service the site during these peak times.
215. Overall, the proposals would deliver an improvement to the existing servicing arrangement for the site and subject to a delivery and servicing plan (DSP) being secured by a Section 106 obligation, the servicing strategy is considered acceptable despite its non-compliance with policy DM16.5 of the Local Plan 2015 and VT2 of the draft City Plan 2036.

### **Car parking**

216. 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.
217. The site can currently accommodate up to four vehicles off-street within the basement area of the site with access via a vehicular ramp on the western side of Cripplegate Street. The proposals seek to remove all parking opportunities from the site including the removal of the existing ramp into the basement area is welcome and ensures policy compliance.
218. There is no Blue Badge parking provided on the site at present, and no Blue Badge parking space is proposed within the site. To ensure compliance with London Plan requirements, a new on-street disabled bay is to be provided within the vicinity of the site on Fann Street, negotiated as part of the relevant legal agreements. This is considered a suitable location and could be suitably accommodated without any undue impacts upon the function of the local highway. The relevant traffic orders would be delivered as part of the S278 works, secured through the S106 agreement.

### **Trip Generation**

219. A trip generation assessment has been conducted for the site using TRICS data for a similar development in London with a PTAL rating of 6B, which is considered a suitable comparator site. It is predicted that the total number of trips to the development during the AM peak hour (08:00-09:00) would be 565 and during the PM peak hour (17:00-18:00) would be 477, with the vast majority of trips being undertaken by sustainable modes. This represents an increase of 93 and 79 trips respectively during the peak hours, from the existing to proposed site.
220. To account for the increased level of activity moving to and from the new entrance on the north-western corner of the site, the applicant is required to fund the provision of a new raised table at the junction of Brackley Street and Viscount Street. This would ensure that significantly improved crossing points are available at this location and that pedestrians can move across this junction safely to and from the site. Subject to these highways improvements, the proposed level of activity could be suitably accommodated within the existing Highway network without giving rise to any undue impacts to pedestrian safety or wider Highway safety concerns in general.



### **Stopping up and dedication of land**

221. As the highway authority for Brackley Street, Viscount Street and parts of Cripplegate Street the Corporation 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”.
222. The proposals include alterations to the building line on Brackley Street, Viscount Street and Cripplegate Street. Minor amounts of stopping up (total of 4.414sq.m) are proposed along Brackley Street, Viscount Street and Cripplegate Street, to account for the re-cladding of the existing structural columns with the new facade system, the re-cladding being required to provide insulation zones to achieve U-values.
223. Although, usually, the City would seek to avoid any net loss of public highway, the area of stopping up required is very minor and would not unduly impact the safe operation of the footway, nor impede on Corporation owned and maintained land as a whole with regards ownership or dedication of the land.
224. Cripplegate Street is in mixed ownership; the applicant owns the land above the current vehicular access ramp, and the Corporation own and maintain the rest of Cripplegate Street. As the proposals include the ‘filling in’ of the vehicular access ramp to bring it to grade with Cripplegate Street, and would allow the public to pass over the land; it is intended to dedicate this land as permissive path.
225. This would allow the public to pass and re-pass over the land at times set out within the Public Realm Management Plan (in line with the Public London Charter), but would not accrue public rights of way over the land; the applicant would be able to close off the land for a minimum of one day per calendar year in order to retain ownership rights.
226. Given the different ownership and therefore maintenance responsibilities of Cripplegate Street, a robust Public Realm Management Plan is required, in addition to design details secured via condition and through S106 obligation, to ensure a seamless approach to the public realm in terms of design, lighting, planting and general materials palette.

### **Section 278 Agreement**

227. Should this application be approved, the City of London would require a Section 278 agreement for the streets for which they are the highway authority.
228. A Section 278 agreement would be secured for the City which would include (but would not be limited to):
- Provision of a raised table at the Brackley Street and Viscount Street junction;
  - Provision of a footway extension in conjunction with the raised table at the Brackley Street and Viscount Street junction;
  - Relaying of footways adjacent to the site on Brackley Street, Viscount Street and Golden Lane in accordance with the City of London materials palette;
  - Dropped kerbs on Brackley and Viscount Street in conjunction with servicing strategy
  - Change to Traffic Management orders to provide improved loading opportunities along site frontage on Brackley Street and Disabled parking bay on Fann Street
  - Public realm improvements to Cripplegate Street and Golden Lane in line with agreed landscaping details.
229. The Section 278 works would be in line with the 10 Healthy Streets indicators, the City of London Transport Strategy and City of London's Public Realm vision. This would be secured through the Section 106 agreement.

### **Construction Logistics Plan**

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

### **Transport and Highways conclusion**

231. The proposal would promote active travel through the provision of cycle parking in line with the London Plan requirements. The public realm works would enhance the pedestrian environment around the site, particularly on the currently undesirable and undermaintained Cripplegate Street.

232. Subject to conditions and planning obligations, the proposal would accord with relevant transportation related policies including London Plan policies T5 cycle parking and T6 car parking. It accords with Local Plan 2015 Policy DM3.2, and the draft City Plan 2036 Policies AT1, AT2, AT3 and VT3. The proposals are, however, not in accordance with policy DM16.5 of the Local Plan, nor draft City Plan 2036 policy VT2 relating to deliveries and servicing. This non-compliance with policy can be offset by the general improvement to servicing and deliveries to the site through off-site consolidation and a cap on servicing numbers, and management around the hours in which servicing is undertaken.
233. Overall, the proposal is considered acceptable in transport terms and would deliver public realm improvements and reduce the overall number of vehicular and servicing trips to and from the site.

### **Waste Storage and Refuse Management**

234. Local Plan policy DM17.1 requires development schemes to incorporate waste facilities and allow for the separate storage and collection of recyclable materials, with waste facilities integrated into the design of buildings.
235. Local Plan policy DM16.5 states that '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.'
236. The proposals incorporate a waste storage area to serve the whole development within the basement of the building, with 2no. lifts (for dual use with cyclists) provided up to ground level, coming out on Viscount Street.
237. The proposal seeks to make use of the external area of privately maintained public realm on Cripplegate Street for the temporary storage of refuse bins prior to and after collections. This requires multiple bins to be moved circa 15m along the public footway on Viscount Street between the service lifts and refuse presentation area prior to and after collections.
238. This arrangement is highly undesirable and would unduly impact upon the quality of the footways and public realm for pedestrians as well as generating a significant level of noise directly opposite a number of residential premises. To overcome this concern, it is recommended that a condition be attached to any grant of planning permission seeking a revised ground floor layout which includes an internal bin presentation

area accessed directly from the public highway, as well as a full refuse management strategy to be secured. Subject to these being secured, the proposed refuse management proposals would be acceptable.

239. The City of London's Cleansing Team have confirmed that the proposed waste storage and collection facilities complies with their requirements, but as outlined above, the proposals currently fail to meet the requirements of policies DM16.5 and DM17.1 of the Local Plan.

## **Sustainability**

### **Circular Economy**

240. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan policies CS15 and DM17.2 set out the City's support for circular economy principles, in addition to draft City Plan 2036 Policy S16.
241. The submitted Circular Economy Strategy include the reuse of the substructure, of the majority of the structural frame and of large portions of the facade. The applicants have undertaken a pre-refurbishment audit and identified products and materials suitable for reuse onsite and offsite, for the latter using the marketplace platform Globechain. Recycling targets and destinations for waste which cannot be reused have been considered.
242. The intention is to use materials with high recycled content and with third party certificate Environmental Product Declarations (EDPs).
243. 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 are required by condition. 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.

### **Operational energy strategy and carbon emissions**

244. The Energy Statement accompanying the planning application demonstrates that the development has been designed to achieve an overall 45% reduction in regulated carbon emissions compared with a Building Regulations compliant building.

245. The proposed energy demand reduction strategy includes high performance thermal envelopes, both for the new and the refurbished facades, optimised glazing to solid ratios and solar shading blinds, as well as heat recovery devices inside air handling units. The offices would benefit from natural ventilation from opening vents within the glazing in combination with high efficiency air conditioning and lighting systems with occupancy sensors and daylight dimming. This would cumulatively reduce the building's operational carbon emissions by 12% compared to a Building Regulations compliant building.
246. The Citigen Heat Network runs near the site; however, it is currently not considered to be a low carbon option due to its Combined Heat and Power energy source. However, the opportunity to connect to a future decarbonised district heating network would be incorporated into the proposed development at basement level.
247. In relation to renewable energy technologies, a system of air source heat pumps for space heating and cooling and water to water heat pumps for hot water demand, as well as 12sq.m (minimum) of photovoltaic panels would provide a potential 33% reduction of carbon emissions compared to a Building Regulations compliant building.
248. 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 will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

### **BREEAM**

249. A bespoke BREEAM New Construction and Refurbishment and Fit-Out 2014 pre-assessment has been prepared, targeting an "outstanding" rating. 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 85.64%. The pre-assessment indicates 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.

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

### **Other certifications**

251. The applicants are engaging with the NABERS UK benchmarking scheme that assesses and rates the energy efficiency of office buildings by monitoring their energy use over a 12-month period and thereby reflecting the real-life usage. The assessment would identify any performance gap between design and actual energy use and encourage improvements in the operation of the building. A NABERS Design for Performance rating includes energy uses beyond the regulated energy which is assessed under Part L of the Building Regulations. The design would include an enhanced metering strategy to support the breakdown of energy use data within the building for NABERS compliance reporting.

### **Whole Life-Cycle Carbon Emissions**

252. London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage.
253. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.
254. 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. The results include carbon reduction measures such as the use of 20% recycled content in the steel

structure, 97% recycled content in rebar, cement replacement products and the reuse of the existing raised access floors. Further improvements are sought during the forthcoming detailed design stages, in particular with regard to MEP services that are the largest contributor to the embodied carbon emissions.

255. Embodied carbon emissions at planning application stage:

Scope	Proposed Redevelopment	Benchmark	Benchmark Source
RICS Components	kgCO2/m2	kgCO2/m2	
A1-A5	291	1000	GLA Standard
		600	GLA Aspirational
		600	LETI 2020 Design
		350	LETI 2030 Design
A-C (excluding B6-B7)	660	1500	GLA Standard
		1400	RIBA Business as Usual
		1180	RIBA 2021 Good
		970	RIBA 2025
		900	GLA Aspirational
		750	RIBA 2030
A-C (including B6-B7)	1,648		

256. These Whole Life-Cycle carbon emissions assessment results in overall whole life-cycle carbon emissions of 25,749,000 kgCO<sub>2</sub>, or 1,648 kgCO<sub>2</sub>/m<sup>2</sup>, being emitted over a 60-year period.

257. Over the proposed building's whole life-cycle, the embodied carbon emissions calculations at planning stage demonstrate a 45% reduction in upfront embodied carbon emissions (Modules A1-A5) compared to the Greater London Authority's Aspirational benchmark emissions target. The overall embodied carbon emissions (Modules A-C) would be reduced by 18% below the Aspirational benchmark. These results demonstrate the significant impact of retention on the reduction of carbon emissions in a building type that can be adapted and extended. A detailed Whole Life-Cycle carbon assessment incorporating improvements that can be achieved through the detailed design stage, and a confirmation of the post-construction results have been requested by conditions.

### **Urban Greening and Biodiversity**

258. Local Plan Policy DM19.2 promotes Urban Greening and Biodiversity, DM 10.2 (Design of green roofs and walls) and 10.3 (Roof gardens and terraces) encourages high quality roof gardens and terraces.

259. The proposal seeks to create green roofs (436sq.m), roof terraces (Levels 8 to 12), green walls (via climbers), window boxes, trees, winter gardens, integrated seating and the installation of bird boxes. The current building lacks greening, and the introduction of urban greening features across the site including upgrading the landscaping to the public realm area is welcomed. The open space (Cripplegate Court) is at the front of the building and designated as a 'Secondary Civic Space' which includes planting bed/s and trees. To the west of the site off Fann Street is a Site of Importance for Nature Conservation (SINC) known as Barbican and St Alphage Garden which includes the Barbican Wildlife Garden and Beech Gardens.
260. A small extensive biodiverse green roof (42sq.m) would be provided which would include native wildflower roof planting and features to aid biodiversity, such as sand, log-piles and rocks. An extensive green roof should have a substrate of minimum settled depth 80mm (or 60mm beneath vegetation blanket) and meet the requirements of GRO Code 2014. The green roofs would provide biodiversity benefits, visual interest and a green and attractive setting as there are hard roof surfaces on the existing and surrounding buildings. To deliver an intensive biodiverse green roof it should have minimum substrate depth of 150mm. Bird boxes (Swift and house sparrow) are proposed which would be integrated into the facade of the building which is welcome.
261. Private office terraces would be provided at upper levels (735sqm) which would include urban greening through planters, perimeter planting and trees. The roof terraces would provide valuable amenity space, shelter and views for occupiers of the building. It is welcome that the planting proposed on the roof terraces would be of sufficient substrates depths to support herbaceous and shrub planting and additional depths would allow greater soil volume for trees. It is also encouraging that the blue roof drainage layer below would allow the subsoil to absorb rainwater to minimise water usage from the mains.
262. To the south of the building a narrow public access route (Cripplegate Street) would include a decorative feature screen underneath the existing Barbican ramp and new raised planters would be included. The southern facade would include green walls to the external face of the glazed winter gardens (Levels 3 to 9). Appropriate plant species should be carefully selected for the green walls; this is secured by condition.
263. Local Plan Policy DM10.2 encourages developments to install green roofs, Policy DM10.3 encourages high quality roof gardens and terraces



and Policy DM19.2 encourages the inclusion of green roofs and walls, soft landscaping and trees. Emerging City Plan Policy DE5 encourage high quality public and private roof terraces, gardens and viewing galleries where there would be no immediate overlooking of residential premises (see above) or impact on identified views, and which optimise the potential for urban greening.

264. The addition of the green roof and greening of the terraces on this development are welcome not only for their aesthetic value when viewed from nearby buildings but also for their contribution to biodiversity and urban greening, rainwater run-off, insulation and urban cooling.
265. An Urban Greening Factor (UGF) calculation has been submitted with the application based on both the City Plan and London Plan scoring metrics, and a comparative UGF calculation provided post-submission, comparing the score including the CoL owned and maintained street trees with the score with the trees excluded.
266. An Urban Greening Factor (UGF) calculation score has been submitted with the application based on both the London Plan and City Plan. The red line planning application boundary is based on a site area of 2362sq.m and includes the following surface cover types as set out in the table below (based on the City Plan):

<b>Total Site Area: 2362sq.m</b>			
<b>Surface Cover Type</b>	<b>Area (sq.m)</b>	<b>UGF (City Plan)</b>	<b>Score</b>
Extensive green roof (80mm substrate depth)	28.70	0.8	22.96
Flower rich perennial planting	151.30	0.7	105.91
Hedges (line of mature shrubs one or two shrubs wide) (Ornamental Shrubs)	226.95	0.6	136.17
Standard Trees planted in connected tree pits with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree	298.00	0.9	268.20
Standard Trees planted in pits with soil volumes less than two thirds of the projected canopy area of the mature tree	53.80	0.7	37.66

Green wall – modular system or climbers rooted in soil	174.50	0.7	122.15
Sealed surfaces	1119.00	0	0
Permeable paving	176.00	0.1	17.60
Measured Area	2228.25	710.65	
(Measured Area minus 174.5sq.m for areas unsuitable for green roofs/walls (plant louvre, mansard, parapet walls))	(2053.75)		
Total Site Area (sqm)	2362		
Calculating UGF Score			
UGF Calculation	710.65/2362		
UGF Score Total	0.301		

267. With the street trees included, the UGF for this application has been calculated as 0.277 (London Plan methodology) and 0.301 (CoL methodology) based on the information provided, which fails to meet the London Plan target of 0.3 but just meets the City's draft Local Plan UGF target of 0.3 for commercial development.

268. The UGF score with the trees excluded is 0.240 (London Plan methodology) and 0.256 (CoL methodology). The proposals, therefore, only meet the minimum target UGF score when including trees that are owned and maintained by the Corporation. Although this is unfortunate, provision for this is made within the London Plan. In particular, policy G5(c) of the London Plan states, "existing green cover retained on site should count towards developments meeting the interim target scores" and makes no differentiation between ownership/maintenance responsibilities of the green cover retained on site.

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

270. Local Plan Policies DM10.2 (Design of green roofs and walls) and DM19.2 (Biodiversity and Urban Greening) encourage the inclusion of green roofs and walls. Planting across the site including the winter gardens would provide a green and attractive setting, and the roof terraces offers important amenity space for occupiers of the building. The proposed greening accords with Local Plan policies DM10.2, DM10.3 and DM19.2.

## Trees

271. Paragraph 131 of the NPPF states that ‘Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible...’
272. Policy G7 of the London Plan (Trees and woodlands) states that development proposals “...*should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.*”
273. Local Plan (2015) Policy DM19.2 (Biodiversity and urban greening) states “*Developments should promote biodiversity and contribute to urban greening by incorporating:*
- *green roofs and walls, soft landscaping and trees;*
  - *features for wildlife, such as nesting boxes and beehives;*
  - *a planting mix which encourages biodiversity;*
  - *planting which will be resilient to a range of climate conditions;...*”
274. Paragraph 3.19.17 states “*Where existing green infrastructure is disturbed, removed or damaged as a result of development, it must be replaced with good quality urban greening. There should be no net loss of green infrastructure. Existing trees should be replaced with trees of an equivalent size and quality*”.
275. Draft Local Plan (City Plan 2036) Policy OS4 (Trees) states: “*The City Corporation will seek to increase the number of trees and their overall canopy cover by:*
- *Requiring the retention of existing mature and semi-mature trees and encouraging additional tree planting to be integrated into the*

*design and layout of developments and public realm improvements where appropriate;...*

- *Other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed, requiring their replacement with trees that can attain an equivalent value;*
- *Ensuring that existing trees located on or adjacent to development sites are considered during the planning process and are protected from damage during construction works; ...”*

276. There are three early-mature trees in the vicinity of this site comprising a Turkish Hazel within the open space area, a Silver Lime positioned on Golden Lane and an Elder to the south of the site close to the ramp of the Barbican Centre. The trees are not subject to Tree Preservation Orders, nor do they lie within a conservation area.

277. It was originally proposed to remove the Turkish Hazel (Category C) to the Golden Lane frontage, to open up the public realm and views of the building entrance, improve landscaping and provide areas for people to dwell, but also for apparent arboricultural management principles, with the proposed removal of the Turkish Hazel done so with the intention of affording the larger category A Lime tree additional space in which to develop. Following concern raised through consultation with residents and Officers, the Turkish hazel is now proposed to be retained, and instead allowed to form an aerodynamic canopy with the adjacent lime tree. The small Elder tree to the south of the site is proposed to be removed.

278. The Lime tree (category A) is to be retained and pruned, with the work undertaken by the City of London and funded by the applicant through Section 106 obligation. Some confusion was raised through consultation about the extent of pruning to the Lime tree. The applicant has clarified that this is simply to lift the crown to a height of approximately 5m by removing sub-dominant, pendulous growth only. Significant ‘scaffold’ branches would be retained. Once again, this is just indicative, and any pruning works would be undertaken by the City Gardens team. The pruning represents minor aesthetic works to the lower part of the canopy only, and are considered by the Arboricultural Consultant, and agreed by City Gardens, to be needed in the interests of maintaining the necessary highway and footway clearances by the Corporation and for good arboricultural management, irrespective of the proposed development at the Site. The proposed pruning would not have a significant adverse impact on the physiology, morphology, or stability of the lime tree.

279. A new Hawthorn is proposed as part of the landscaping to Cripplegate Street. A new Silver Birch tree is proposed to the corner of Brackley Street and Viscount Street. Birch trees have historically been planted a lot as street trees, but they are, in general, no longer supported as they are not considered suitable for climate resilience. Further details of the proposed tree planting are required by condition for exact (alternate) species and maintenance, and would be worked into the public realm works as part of the Section 278 agreement.
280. The proposals are in accordance with principles of good arboricultural management, and policy G7 of the London Plan and DM19.2 of the Local Plan.

## **Climate Change Resilience**

### **Water Resources**

281. The internal water consumption of the proposed development would be reduced through efficiency and leak detection measures. In addition, a rainwater harvesting system would be incorporated to be used for WC flushing and irrigation.

### **Flooding**

282. The Surface Water Drainage Strategy proposes blue roofs that delay the discharge of rainwater into the sewer, with an estimated total discharge rate of 0.611l/s for all rainfall events including the 1 in 100 year and the storage provided within the blue roof area includes a 40% climate change allowance). Further details are required by condition.

### **Heat Stress**

283. The sustainability statement outlines measures to prevent overheating, including natural ventilation openings and solar shading blinds. A report is requested by condition that provides further details of all measures that help to make the building resilient to higher temperatures and urban heat island effects.

### **Natural Capital and Pest & Diseases**

284. The proposed development would incorporate urban greening and enhance ecological value of the site by providing new planting on public realm as well as additional greening to the terraces and facade, including a range of biodiverse habitats. The details of the landscape planting will be important in ensuring that the plants and habitats created are resilient

to hotter dryer summers, warmer wetter winter, more extreme weather events and pests and diseases.

285. Overall, this development would include a wide range of measures that will contribute to climate change resilience. Details of these measures will determine how effectively the building performs in coming decades, and conditions are attached to seek more detailed modelling and planting plans against the UK Climate Projections UKCP18 to 2080.

### **Sustainability Conclusion**

286. 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.
287. The proposed development, by way of its central location within London, its opportunities for providing a positive and healthy work/life environment, and its credentials, would positively contribute to the economic, social and environmental sustainability of the City of London. The proposed sustainability strategy compares positively with the aims and policies of the London Plan and Local Plan, and the development targets an “outstanding” BREEAM assessment rating.
288. The proposals indicate that Whole Life-Cycle Carbon emissions can be significantly reduced to below the GLA’s Aspirational Benchmark as a result of the proposed structural retention. The building design responds to climate change resilience by reducing solar gain, incorporating natural ventilation, water saving measures and various opportunities for urban greening and biodiversity, while passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond London Plan requirements.

### **Microclimatic Impacts**

#### **Wind Microclimate**

289. Policies DM10.1 of the Local Plan 2015, policy S8 of the draft City Plan 2036 and policy D8 of the London Plan seek to optimise wind conditions in and around development sites. The design of developments should avoid unacceptable wind impacts.

290. The proposed development is approximately +57.445m AOD in height, so Computational Fluid Dynamics (CFD) simulations have been undertaken and are considered to be acceptable for the height and context. CFD simulation analysis has also been carried out in accordance with the City's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London. Four scenarios have been tested:
- Existing site with existing surrounding buildings;
  - Proposed development with existing surrounding buildings;
  - Proposed development with existing surrounding buildings and proposed landscaping; and
  - Proposed development with cumulative surrounding buildings.
291. The cumulative surrounding buildings used for the assessment include 1-12 Long Lane (18/01020/FULMAJ) and 150 Aldersgate Street, 3-4 Bartholomew Place (20/00371/FULMAJ).
292. An addendum 'letter of conformity' was provided with the revised submission. The height of the building was reduced by circa 930mm in the revised proposals, and the letter from RWDI outlines that the reduction in height is unlikely to make a material change to the outcomes of the CFD testing originally submitted with the application.
293. Wind conditions are compared with the intended pedestrian use of the various locations including carriageways, footways and building entrances, as well as surrounding public spaces and roof terraces. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Wind Microclimate Guidelines, being 5 Comfort Categories defining conditions suitable for frequent sitting/occasional sitting/standing/walking/uncomfortable.
294. A separate safety criterion is also applied to ascertain if there would be any safety risks to pedestrians or cyclists.
295. If resulting conditions are identified as being unsafe or unsuitable in terms of the intended use, then mitigation is required. If wind conditions become windier but remain in a category suitable for intended use, or if there is a negligible or beneficial effect, wind mitigation is not required.
296. Assessments have been carried out for both the Windiest Season and the Summer Season.

## **Existing Baseline Conditions**

297. In the existing baseline conditions, the CFD analysis shows that conditions around the site are mainly a mix of frequent sitting and occasional sitting, with localised standing use at the south-eastern corner of the Denizen. Off-site ground level conditions range from frequent sitting to standing use. The conditions at the existing and surrounding building entrances are suitable for their intended use (either standing or calmer). There are some pre-existing strong winds that would be a safety concern at upper-level terraces to the Denizen in the windiest season; these are not present to the same degree in the summer season.

## **Proposed development with existing surrounding buildings**

298. In terms of pedestrian comfort, the introduction of the proposed development would give similar results than that of the baseline scenario. The Site would be well sheltered and result in calm conditions, suitable for their intended use, in the surrounding areas.
299. Pedestrian thoroughfares surrounding the site would have wind conditions with a mix of frequent sitting and occasional sitting during the windiest season. The conditions present in the baseline scenario are not worsened by the proposed development, and conditions remain suitable for their intended use.
300. For entrances on-site and in surrounding buildings, the wind conditions would be a mix of frequent sitting and occasional sitting during the windiest season; similarly, off-site entrances would range from frequent sitting to standing use during the windiest season. These are suitable for the intended uses.
301. Wind conditions at nearby, off-site bus stops would range from frequent sitting to standing use during the windiest season, which is suitable for the intended use.
302. At surrounding upper-level terraces, the wind conditions would vary from frequent sitting to walking use during the summer season. These conditions are not worsened from the baseline scenario.
303. Strong winds that would be a safety concern would be anticipated on the 10<sup>th</sup> and 12<sup>th</sup> floor office amenity terraces of the proposed development in the absence of the proposed landscaping scheme.



### **Proposed development with existing surrounding buildings and proposed landscaping**

304. In the presence of the proposed development and the proposed landscaping, conditions at pedestrian thoroughfares around the site would experience wind conditions which are suitable for intended use in both the summer and winter scenarios, which are similar to that in scenario 2 (proposed development with existing surrounding buildings in the absence of proposed landscaping) or would not worsen compared to the baseline scenario.
305. Upper-level terraces on the surrounding buildings would have wind conditions ranging from frequent sitting to walking use during the summer season. These conditions are suitable for the intended use or no worse than the baseline scenario.
306. Wind conditions for the on-site upper-level terraces would range from frequent sitting to standing use, with localised walking use along the western edge at 12<sup>th</sup> floor level during the summer season, and more prevalent walking use across the 12<sup>th</sup> floor terrace during the windiest season. Walking use wind conditions in the summer season would be situated in a zone of planted hedging and would not be accessible. The seating areas on the terraces at levels 8, 10 and 12 are expected to have windier than desired standing use wind conditions during the summer season, which would be used as and when by office tenants. Mitigation measures could be used to improve conditions.
307. There are no safety concerns regarding the 12<sup>th</sup> floor office amenity terrace or across the rest of the site.

### **Proposed development with cumulative surrounding buildings (no landscaping)**

308. With the inclusion of surrounding consented schemes at 1-12 Long Lane and 150 Aldersgate, the wind conditions would be similar to that with the existing surrounding buildings in situ. This is as a result of the relatively minor change in height of the cumulative developments compared to that of the existing surrounding buildings, as well as their distance away from the site. All thoroughfare, entrance and off-site terrace locations would have suitable conditions for the intended uses or would not be worsened over the baseline scenario. Windier than desired conditions would be present on the upper-level office amenity terraces of the proposed development as discussed above. Conditions would be expected to

improve with the inclusion of the proposed landscaping scheme, however windier than desired conditions would persist at levels 8, 10 and 12. Mitigation measures are recommended.

309. Strong winds that would be a safety concern would be anticipated on the 12<sup>th</sup> floor on-site terrace. However, with the inclusion of the proposed landscaping, these safety concerns would no longer occur.

### **Mitigation measures**

310. Wind conditions in the area surrounding the site are expected to be suitable for intended uses. Windier than suitable conditions at levels 8, 10 and 12 of the proposed site would be improved with the introduction of the proposed landscaping scheme, however, windier than desired standing use would persist during the summer season in particular pockets of the roof terraces.
311. It is expected that the upper-level office amenity terrace would likely be used for seating as and when conditions permit. Mitigation measures have been proposed irrespective of this, and subject to the implementation of these measures, the wind conditions at the upper-level office terraces would be improved to frequent sitting.
312. Mitigation measures suggested include planters with a minimum of 1.5m planting (which would also assist in reducing the potential for overlooking to neighbouring buildings), and increased numbers of deciduous trees in close proximity to the seating areas provided they are at least 2-3m tall. The proposed landscaping scheme which would include planters and seating, could be used to improve the conditions, and ensure that the terraces would be suitable for use during the summer months. Further details of the mitigation measures would be secured by condition.

### **Wind Microclimate Conclusion**

313. Under the proposed and cumulative scenarios, the majority of tested locations would be suitable for their intended purpose. Mitigation would be required to the level 8, 10 and 12 roof terraces on-site to ensure that it would be suitable for frequent/occasional sitting. Details of the mitigation would be required by condition. Subject to conditions the development would have an acceptable impact on wind flows in and around the site in accordance with policies DM10.1 of the Local Plan, S8 of the draft City Plan 2036 and D8 of the London Plan.

## **Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution**

### **Assessment Context – Planning policy**

314. 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.
315. 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 (BRE) guidelines.
316. Draft City Plan Policy DE8 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
317. 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.
318. The application site is adjacent to both the Barbican and Golden Lane identified residential areas. Local Plan Policy DM 21.3 'Residential Environment' seeks to protect the amenity of existing residents within identified residential areas by ensuring that all development proposals are designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.

### **Assessment Context – BRE Guidelines**

319. The BRE guidelines "Site layout planning for daylight and sunlight - A guide to good practice" (2022) 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:** 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:** 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. The guidelines consider kitchens and bedrooms to be less important but that care should be taken to not block too much sun from these rooms.

#### *Interpreting results*

320. In undertaking assessments, a judgement can be made as to the level of impact on affected windows and rooms. Where there is *proportionately* 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*

321. Overshadowing of amenity spaces is measured using 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.

#### **Assessment**

322. A daylight, sunlight and overshadowing report has been submitted with the application, which has been undertaken using the recommended BRE daylight (VSC, NSL), sunlight (APSH) and overshadowing (SHOG) assessment methodologies. The report has been updated to take account of the revisions to the proposed development, including a reduction in the overall height of the proposed extension and reduced proposed massing to the north, which have been incorporated to help mitigate the impact on the daylight and sunlight received by the residential accommodation within The Denizen, which is immediately to the north of the application site, on the opposite side of Brackley Street.

323. The updated report reviews the daylight and, where appropriate, sunlight impacts to the following neighbouring properties: 1. Tudor Rose Court; 2. The Cobalt Building; 3. Ben Jonson House; 4. Breton House; 5. The Prior Weston Primary School; 6. The Denizen; 7. The Welsh Presbyterian Church; 8. Cuthbert Harrowing House; and 9. Bowater House. The report also includes an overshadowing assessment of 10 external amenity areas surrounding the application site, before and after the revised proposed development.



324. A supplementary radiance-based assessment of the internal daylight levels within the residential properties within The Denizen has also been submitted, which takes account of internal and externally reflected daylight in the existing and proposed scenarios (a full explanation of the radiance assessment methodology is provided in Appendix C). The Denizen has been chosen as the subject of the radiance assessment as it is the property that would experience the greatest level of impact to the daylight and sunlight it receives as a result of the proposed development.

325. The updated daylight, sunlight and overshadowing report and radiance-based assessment report has been independently reviewed by the BRE.

### **Daylight and Sunlight**

326. The daylight and sunlight assessment demonstrates that the following residential properties would not experience any noticeable reductions in daylight as a result of the proposed development: Tudor Rose Court, Ben Johnson House and Breton House. The alterations in sunlight to these

properties would be in compliance with the BRE guidelines. The remaining neighbouring properties are discussed in more detail below.

### The Cobalt Building

327. The Cobalt Building is an eight-storey residential apartment block located to the west of the application site. A total of 149 windows serving 106 habitable rooms have been assessed for daylight. 142 windows would experience BRE compliant alterations in VSC (below 20%), three of which would experience gains in available skylight, as a result of the proposed development. The seven remaining windows, which serve bedrooms on the ground, first, sixth and seventh floors, would experience minor adverse reductions in VSC (ranging from 20.4% to 22.1%). The retained VSC levels to the two windows on the ground and first floors are commensurate with windows to neighbouring bedrooms on these floors. The windows on the sixth and seventh floors would retain VSC levels of 15% to 22%, which is commensurate with a number of the windows to neighbouring bedrooms in the existing condition and can be considered acceptable when taking account of the urban location of the building and the minor adverse nature of the proportional reductions in VSC.
328. Of the 106 habitable rooms assessed for daylight distribution (NSL), 82 would comply with the BRE guidelines in that they would not experience any noticeable reductions in NSL. Of the remaining 24 rooms, 16 would experience minor adverse reductions in NSL and eight would experience moderate adverse reductions in NSL, as a result of the proposed development. 20 of these 24 rooms are bedrooms. Paragraph 2.2.10 of the BRE guidelines state that: *“Where room layouts are known...the impact on the daylighting distribution in the existing building should be found by plotting the no sky line in each of the main rooms. For [dwellings] this would include living rooms, dining rooms, and kitchens; bedrooms should also be analysed although they are less important.”* Of the remaining four rooms, three living rooms (R9/20, R9/21 and R9/26) and a kitchen (R7/27) would experience minor adverse reductions in NSL of between 22.7% and 25.3%. The overall daylight impact to this building is considered to be minor.
329. 24 windows, which serve living rooms and are orientated within 90° due south, have been assessed for sunlight. All would experience BRE compliant alterations in annual probable sunlight hours (APSH).

### The Prior Weston Primary School

330. The Prior Weston Primary School is a three-storey education facility located to the northeast of the application site. Across the three storeys of the building there are a total of 17 windows serving seven rooms. All windows would experience fully BRE compliant alterations in VSC, with proportional reductions of up to 15.3%.
331. The internal arrangements for the seven rooms have not been confirmed and the daylight distribution (NSL) assessment has been based on assumed room layouts. Of the seven assumed rooms assessed for NSL six would be BRE compliant. An assumed ground floor room (R1/100) would experience a 79.8% reduction in NSL. This room is served by two windows that currently have a vertical sky component of 0%. The area of the room is assumed as 511.2 sq. ft, with an existing room area of 12.4 sq. ft that has a view of the sky. This area would reduce by 9.9 sq. ft as a result of the proposed development. While the proportional reduction of 79.8% of daylight distribution may appear to be significant, the actual area of the room that would lose of view of the sky can be considered to be small. This room is an isolated anomaly due to its recessed location underneath a deep-set overhang at first floor level, which is reflected in the very low existing level of daylight distribution and the non-existent level of VSC.
332. Any alterations in sunlight to the windows within 90° due south serving the school would be within the BRE guidelines.

### The Denizen

333. The Denizen is a recently completed ten storey residential development to the north of the application site, directly on the other side of Brackley Street. It is understood that the majority of the residential units within the development have been sold and that the building is occupied.
334. The proposed development involves the 'filling-out' and northern extension of the existing building envelope to the site boundary, towards The Denizen, and an upwards extension of three additional storeys (the existing building has a maximum parapet height of 55.24m, with a central lift overrun at a height of 57.45m; the proposed development would have a maximum parapet height of 62.13m, with a central plant room at a height of 67.59m). It is this proposed increase in height and massing that would result in a reduction in the daylight and sunlight received by the residential properties within The Denizen.

335. The daylight, sunlight, and overshadowing report states that at The Denizen 145 windows serving 61 habitable rooms have been assessed for daylight (VSC, NSL) and sunlight (APSH). The 145 windows assessed includes several north and west facing windows that are orientated away from the development and not within 90 degrees of due south. This is because these windows serve dual/triple aspect rooms, which are also served by windows that do face the application site and are eligible for assessment, and are relevant for the assessment of the level of daylight distribution within the rooms that they serve.

### ***Daylight***

336. The VSC results demonstrate that 98 out of the 145 windows assessed (68%) would be BRE compliant. Of the remaining 47 windows, 33 would experience minor adverse proportional reductions in VSC (between 20.41% and 29.69%), and 13 would experience moderate adverse reductions (between 30.53% and 33.36%). Most of the windows impacted would serve bedrooms, although three of the affected windows would serve a living room (R4/197); these windows would experience relative losses of VSC of between 27.71% and 33.36%.
337. There is recessed window (W18/197) on a side return that serves a living, kitchen, dining room (LKD) at seventh floor level, that would experience a larger proportional reduction in VSC (55.56%), but for which the actual quantum reduction in visible skylight would be negligible (0.05%). The LKD is served by five further windows that would be BRE compliant and the room would experience a negligible change in daylight distribution (0.2%).
338. The daylight distribution results demonstrate that 36 out of the 61 rooms assessed (59%) for daylight distribution (NSL) would be BRE compliant. Of the 25 rooms that would not comply, 12 would experience minor adverse proportional reductions in daylight distribution (between 20.6% and 29.9%), seven would experience moderate adverse reductions (between 31.3% and 39.3%) and six would experience major adverse reductions (between 40.3% and 63.2%). Of the 25 rooms, 24 are bedrooms, which the BRE Guidelines consider to be less important when assessing the availability of daylight. The remaining room (R4/197) is a seventh floor LKD that would experience a 63.2% reduction in daylight distribution. This L-shaped room is served by three windows (W11/197, W12/197 and W13/197), two of which are recessed from the main facade and obstructed by The Denizen's own building projection to the east, which would make the room more sensitive to losses in daylight



distribution that would result from an increase massing to neighbouring property, as is proposed at the application site opposite.

339. The radiance based ADF results presented in the “Radiance Report” for The Denizen, demonstrate that of the 61 rooms assessed the gains and reductions in daylight (taking account of internally and externally reflected daylight) as a result of the proposed development would be mostly negligible and considered unnoticeable to the human eye:

- 10 rooms would experience an increase of between 0.1% and 0.2% in actual ADF;
- 40 rooms would experience a 0.0% change in actual ADF;
- 5 rooms would experience a decrease of 0.1% in actual ADF;
- 5 rooms would experience a decrease of 0.2% in actual ADF; and
- 1 room would experience a decrease of 0.3% in actual ADF.

340. It is noted that the LKD (R4/197) that would experience minor and moderate adverse reductions in VSC and a major adverse reduction in daylight distribution would experience a radiance based ADF of 0.4% in both the existing and proposed scenarios. This can be attributed to the greater reflective qualities of the material proposed for the north facade of the proposed development. The room that would experience the greatest reduction in radiance based ADF is a bedroom (R3/198) (with a reduction from 1.4% to 1.1%). This room would retain an ADF of 1.1%, which would be above the minimum 1% ADF target that was established for bedrooms as part of the 2011 edition of the BRE Guidelines.

341. At the lower levels of The Denizen (first to fourth floors) there are low existing levels of daylight, that would disproportionately accentuate any percentage reductions in daylight that would occur as a result of the proposed development. This would most notably be the case for the south/application site facing windows and the single aspect rooms that they serve, where access to daylight is restricted by the existing Cripplegate House building that is directly opposite. The daylight assessment results demonstrate that the proportional impact on the daylight received by the windows to these properties would be mostly negligible and minor, with three incidences where there would be a moderate adverse impact to windows (W4/194, W6/194 and W7/194), with proportional reductions of between 31.1% and 32.4% and absolute reductions of between 2.75% and 3.66%. The daylight impact to the properties on these floors is considered to be minor.

342. As would be expected, the residential properties assessed on the upper levels of The Denizen experience higher levels of daylight in the existing

condition, with views over the existing Cripplegate House building, which is demonstrated by existing VSC levels in the mid-teens and above. The assessment results indicate that the properties on the sixth to eight floors would experience moderate impacts to sky visibility, which is reflected in the reductions in VSC and NSL. It is noted that except for one room (R4/197) these moderate impacts are to bedrooms, which the BRE Guidelines considers to be less important. The levels of retained daylight to the windows and rooms on these floors would continue to be greater than the levels of daylight received by the properties at the lower levels in the existing scenario.

### ***Sunlight***

343. Windows orientated within 90° due south that serve sixteen living rooms (which are part of living, kitchen, dining rooms within the development) have been assessed for sunlight. Of the living rooms assessed all but two would experience BRE compliant alterations in annual probable sunlight hours (APSH) as result of the proposed development. The two rooms (R1/193 and R4/197) that would not technically comply with the BRE guidelines would experience annual reductions in annual sunlight of 15.9% and 21% APSH and reductions in winter sunlight of 33.3% and 55.6%. The retained annual sunlight for these rooms would be 37% and 49% respectively, which can be considered a reasonable amount of sunlight that would be acceptable in this location. The sunlight impact to The Denizen is considered to be minor.

### **The Welsh Presbyterian Church**

344. The Welsh Presbyterian Church is a six-storey religious building located to the north of the application site, behind the Denizen. Out of total of 206 windows assessed for daylight (serving 36 assumed habitable rooms) 203 would experience full BRE compliance in relation to VSC. All rooms would experience BRE compliance in alterations to daylight distribution (NSL).
345. Three ground floor windows (W8/1269, W9/1269 and W10/1269) would experience moderate or major adverse proportional reductions in VSC. These windows are located below an existing overhang and receive restricted levels of daylight in the existing condition. The actual quantum of daylight that would be lost as a result of the proposed development would be very low, at less than 0.3% VSC. The assessment of these windows has not been repeated without the overhang in place, as is suggested by the BRE guidelines, but it appears that windows W8 and W9 serve a room (R1/1269) that is lit by other windows that would meet the BRE guidelines, and for which the daylight distribution would be BRE

compliant. The remaining window, W10/1269, is noted to serve a W.C. Taking account of the above factors, the overall daylight impact to this building is considered to be negligible.

346. Any alterations in sunlight to the windows within 90° due south serving the Church would be within the BRE guidelines.

#### Cuthbert Harrowing House

347. Cuthbert Harrowing House is a five-storey residential apartment block located to the northwest of the application site. Across the five storeys of the building, from lower ground to third floor, there is a total of 76 windows serving 49 assumed habitable rooms. Of the 76 windows assessed, 72 would fully comply with the BRE guidelines, with proportional reductions of up to 13.8%. The four remaining windows that would not technically comply with the BRE guidelines (W18/252, W21/252, W24/252 and W28/252) are high-level letterbox style windows above doorways that are recessed underneath a third-floor balcony projection. These windows serve rooms that would pass the daylight distribution test, which are served by two further principal windows that would remain fully BRE compliant.
348. In relation to daylight distribution, the BRE Guidelines state that NSL may be calculated “where room layouts are known”. In this instance the room layouts have not been confirmed, and the daylight distribution assessment has been undertaken based on assumed layouts, which have been informed by external observation, site photography and influenced by partial Estate Agent’s particulars. The daylight distribution assessment results demonstrate that 46 of the 49 assumed rooms would be BRE compliant. Three rooms (R5/249, R6/249 and R9/249) in a recessed location on the lower ground floor would experience proportional NSL reductions of between 32.4% to 63.8%. These rooms have low existing levels of daylight distribution and the actual area of the rooms that would lose a view of the sky would be quite small, being 11.8 sq. ft from a room that is assumed to be 218.6 sq. ft in total. The overall daylight impact to this building is considered to be negligible.
349. Any alterations in sunlight to the windows serving the main living rooms in the building would be within the BRE guidelines.

### Bowater House

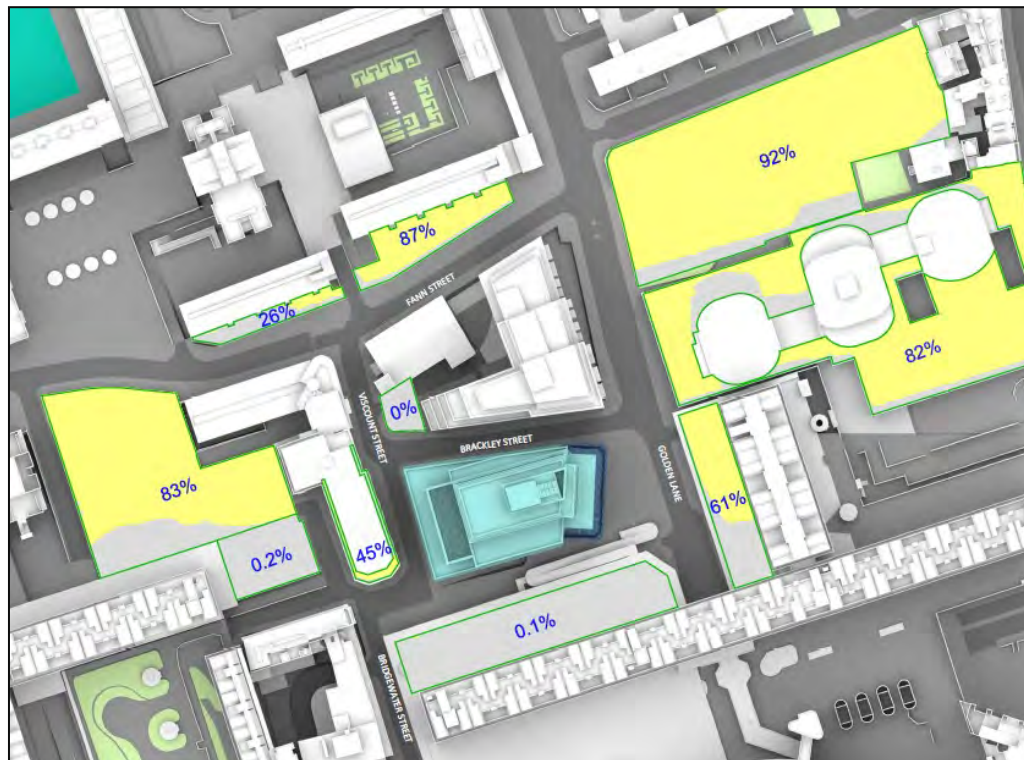
350. Bowater House is a seven-storey residential apartment block located to the north of the application site. Across the seven storeys of the building, from lower ground to fifth floor, there is a total of 116 windows serving 76 assumed habitable rooms. Of the 116 windows assessed, 109 would fully comply with the BRE guidelines, with proportional reductions of up to 18.58%. Like Cuthbert Harrowing House, there are seven fourth floor windows that would not technically comply with the BRE guidelines, which are high-level letter box style windows above doorways, recessed underneath a fifth-floor balcony projection. These windows serve rooms that are served by two further principal windows that would remain fully BRE compliant. The overall daylight impact to this building is considered to be negligible.
351. All assumed rooms that have been assessed for daylight distribution would experience BRE compliant alterations in NSL. Any alterations in sunlight to the windows serving the main living rooms in this building would be within the BRE guidelines.

### Surrounding commercial buildings

352. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended. Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises such as offices are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. Bridgewater House, as the closest commercial building, has not been assessed as part of the Point 2 report. However, it is not considered that the proposed development would give rise to an undue loss of daylight or sunlight to Bridgewater House or other nearby commercial premises given the angle and separation distance, and as such the proposed development is not considered to have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in these respects.

### Overshadowing (Sun Hours on Ground)

353. A total of 10 external amenity areas surrounding the Application Site have been assessed for overshadowing before and after the Revised Proposed Development. The amenity areas that have been assessed are shown edged in green in the diagram below. The areas shaded in yellow represent the areas that receive at least 2 hours or more of direct sunlight on 21st March (Spring Equinox); the areas in grey receive less than 2 hours.



354. The overshadowing assessment demonstrates that the proposed development would not reduce the amount of direct sunlight received in eight of the surrounding amenity areas that have been included in the assessment. The remaining two areas would experience some negligible reductions that would be within the 20% threshold set by the BRE Guidelines. As such, the assessment demonstrates that all amenity areas would experience fully BRE compliant alterations in the level of direct sunlight received after the Revised Proposed Development is constructed.

### **Daylight, Sunlight and Overshadowing Conclusion**

355. The daylight, sunlight and overshadowing report has assessed the daylight and sunlight impact to nine surrounding properties (seven residential buildings and two non-residential buildings, including a place

of worship and an educational facility) and the direct sunlight impact to 10 surrounding external amenity spaces.

356. The detailed technical assessments demonstrate that the residential units at Tudor Rose Court, Breton House and Ben Jonson House would be fully BRE compliant in relation to both daylight and sunlight.
357. There would be a minor daylight impact to the Cobalt Building; seven out of 159 windows would experience proportional reductions in VSC beyond the BRE guidelines, and 24 out of 106 rooms would experience noticeable reductions in daylight distribution. The technical breaches of the BRE guidelines in relation to VSC would be marginal and the greatest reductions in daylight distribution would be to bedrooms which the BRE states are less important in this respect.
358. The properties at Cuthbert Harrowing House and Bowater House, and The Prior Weston Primary School and The Welsh Presbyterian Church, would experience minor daylight impacts to isolated locations underneath balconies and / or overhangs.
359. The most notable impact to daylight would be experienced by the properties in The Denizen. The impacts would vary up the building with minor impacts on the lower floors and more moderate impacts on the sixth to eighth floors, where the vast majority of the impacts would be to bedrooms. The exception would be the loss of daylight to a living kitchen dining room (R4/197) which would be considered moderate when taking account of the impacts to skylight visibility (VSC and NSL). It is noted, however, that radiance based ADF assessment results indicate that the appearance of daylight within the room would be the same in the existing and proposed scenarios (0.4%).
360. All but two main living rooms within the neighbouring properties with a window orientated within 90° due south would experience BRE compliant alterations in Annual Probable Sunlight Hours (APSH). The two living rooms that would not technically comply with the BRE Guidelines would be within The Denizen. The sunlight impact to these rooms would be minor with retained levels of annual sunlight that can be considered acceptable in this location.
361. The surrounding ten external amenity areas assessed would experience fully BRE compliant alterations in direct sunlight on 21 March.

362. Overall, the daylight and sunlight impact of the proposed development on neighbouring properties and external amenity areas is considered to be acceptable and in accordance with the requirements of Local Plan Policies DM10.7 and DM21.3, London Plan Policy D6 and Draft City Plan Policy DE8.

### **Solar Glare and Light Pollution**

#### **Solar Glare**

363. The BRE Guidelines recommend that solar glare analysis be carried out to assess the impact of glazed facades on road users in the vicinity. Policy DM10.1 of the Local Plan and policies S8 and DE8 of the draft City Plan seek to ensure that developments address and do not have any intrusive solar glare impacts on the surrounding townscape and public realm.
364. The applicant has not provided a solar glare assessment within the submission. However, given the design of the building, with vertical 'fins' incorporated within the north and west elevations and as part of the winter gardens on the south elevation, as well as fritted glass and the overall reduction in glazing within the existing envelope as part of the development, Officers consider that there would not be a high potential for solar glare as a result of the development.
365. Notwithstanding, should planning permission be granted, a clause would be included within the S.106 agreement that would require a post completion solar glare assessment to be submitted if requested by the City. This would include details of any mitigation measures if considered necessary. In the light of the proposed design and materiality of the development and the S.106 clause it is not considered that the development would result in any undue solar glare issues and would therefore accord with policy DM10.1 of the Local Plan and policies S8 and DE8 of the draft City Plan subject to the S106 obligation and conditions around bay details and materials.

#### **Light Pollution**

366. Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.

367. Light pollution can be defined as any light emitting from the proposed development onto a neighbour's property where it is unwanted. The principal guidance for light pollution is set out within the Institution of Lighting Professions (ILP) Professional Lighting Guide PLG 04 – Guidance on Undertaking Environmental Lighting Impact Assessments 2013. The ILP guidance sets out that the maximum level of light intrusion that should be experienced by a neighbouring property in a city centre with high levels of night-time activity is 25-lux pre-curfew, and 5-lux post-curfew (after 11pm).
368. The assessment assumes a worst-case scenario, whereby all the lights within the existing building and proposed development are turned on continuously with no mitigation measures in place, such as blinds. In reality, and given the recommended condition regarding lighting, a number of measures would be used.
369. The technical results within the assessment show that the light pollution levels experienced by neighbouring properties as a result of the proposed development is within the ILP pre-curfew guidance, with an assumption that the building is not in normal use after 11pm, and/or with mitigation measures in place, it is likely that post-curfew light levels would also be within guidance. It is also noted that in reality, the overall effects on surrounding properties could potentially be reduced post-development due to the amount of visible glazing being reduced on key elevations as a result of the new facades on the development.
370. New lighting is proposed in internal and external parts of the development. A condition is recommended requiring a lighting strategy for internal, external and semi external lighting, which would include details of levels and how the lighting has been designed together with management measures to reduce glare and light pollution.
371. Subject to the recommended condition, the proposed development would comply with the Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9.

### **Overlooking and sense of enclosure**

372. A series of terraces are proposed which would be accessible to occupants of the office accommodation. The terraces would be located on the upper levels of the building, at levels 8, 10 and 12 on the south, north and west faces of the building. The terraces have been positioned above neighbouring buildings to reduce overlooking and prevent eye level views out and across. To further mitigate overlooking, the terrace design



includes a significant planted buffer to the edges of the terraces which would filter views. This also means the usable terrace area is set back from the edge, thereby creating a physical barrier to reduce overlooking. The planting within the edge planters would include a high percentage of evergreen shrubs to provide year-round screening. Use of the terraces would be managed by conditions.

373. Policies DM 21.3 of the 2015 Local Plan and Policy H3 of the draft submission City Plan 2036 require all developments to be designed to avoid overlooking and to seek to protect the privacy of adjacent residential accommodation. However, the policies recognise that due to the density of development in the City, it may not always be possible to entirely avoid any impacts on amenity.
374. While the proposed terraces would result in some overlooking to neighbouring buildings and a small loss of privacy to residents, the positioning and design of the terraces and management restrictions would minimise adverse effects to the amenity of adjacent residential occupiers. Conditions are recommended that restrict hours of access to the terraces, prevents promoted events taking place and prevents the use of amplified music.
375. The proposals include the 'stepping out' of the building line of the host property to the north (towards the Denizen) by a maximum of 3m, and to the south (into Cripplegate Street) by 3.3m. The building line remains the same overall on Viscount Street and Golden Lane.
376. There is a significant separation distance between the Site and Ben Jonson House, to the south, of circa 34m. Ben Jonson House also sits at Podium level, elevated from the ground plane of the Site. The stepping out into Cripplegate Street (within the ownership boundary) would not materially the relationship between the Site and Ben Jonson House, and the separation distance would remain significant. There would be no material increase in the sense of enclosure felt by residents of Ben Jonson House.
377. The separation distance between the Site and the Denizen is considerably less; approximately 10m. The separation distance across Brackley Street was formerly more, but when the Denizen was constructed, it also brought the building line forward into Brackley Street. However, the alteration to the northern building line of the Site would be within the confines of the ownership boundary and existing lightwells to the north of the site. The stepping out of the building line may result in a slight increase in the sense of enclosure felt by residents of the Denizen, but in the dense urban

context, and in the context of the Daylight, Sunlight and Overshadowing results, the sense of enclosure would not be materially harmful.

### **Thermal Comfort and Sun Hours on Ground**

378. London Plan Policy D8 and D9 and Draft City Plan 2036 Policy S8 indicates that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings - wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood - must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise microclimatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space.
379. Draft City Plan Strategic Policy S12 requires developers to take account of the potential microclimate and thermal comfort impacts from tall building development at an early stage in the design process. Draft City Plan Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.
380. The Applicant has not submitted a Thermal Comfort Assessment with the application. However, the Thermal Comfort Guidelines state that 'new' developments 'should' submit thermal comfort assessments in conjunction with Wind and Microclimate Assessments. So, despite the lack of formal thermal comfort assessment, which is not yet enshrined in adopted policy nor required by the guidelines for this development, Officers can make strong assertions as to the thermal comfort analysis of the site using the Wind and Microclimate results, read in conjunction with the Daylight, Sunlight and Overshadowing assessment, which included an analysis of Sun Hours on Ground (SHOG) to nearby open spaces. The site is within a sheltered location which provides suitable thermal comfort conditions for the current activities. The introduction of the proposed development and the cumulative scenario are not predicted to change the conditions to the point that they would be incompatible with the current or proposed use types. The terrace levels of the Proposed Development would have suitable SHOG and wind microclimate conditions, acceptable for their intended use.
381. As above under paragraphs 353-354, the SHOG assessment demonstrates that all amenity areas in the locality would experience fully

BRE compliant alterations in the level of direct sunlight received after the Revised Proposed Development is constructed.

### **Noise and Vibration**

- 382. Local Plan policy DM15.7 and London Plan policies D13 and D14 require developers to consider the impact of their developments on the noise environment.
- 383. An Acoustic Planning Report has been submitted which provides an assessment of the impact of noise and vibration from the mechanical plant on the surrounding area.
- 384. The proposed development includes mechanical plant which would be located at both roof and basement levels. To ensure that noise from plant is adequately controlled and minimised, conditions are recommended relating to plant noise and vibration.
- 385. Generally, in City redevelopment schemes, most noise and vibration issues occur during demolition and the early construction phases. Noise and vibration mitigation, including control over working hours and types of equipment to be used, would be included in a Demolition Management Plan and Construction Management Plan to be approved by condition.
- 386. As the servicing plan for the site outlines on-street deliveries and refuse collection, there is the potential for noise disturbance from loading and unloading. Conditions related to restrictions on hours of servicing, excluding overnight servicing, would assist with reducing the potential for noise nuisance to neighbouring residential occupiers, with servicing restricted between 23:00 and 07:00 each weekday (with further restrictions during daytime peaks in line with the CoL Transport Strategy).
- 387. In order to minimise any disturbance from the amenity terraces, conditions are recommended restricting the hours of use of the terraces and the playing of music.

### **Air Quality**

- 388. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 2036 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all developments to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must

minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI1 of the London Plan.

389. The proposed development would be car free and utilise air source heat pumps. The emissions associated with vehicle trips have been assessed and should have negligible impact on the local air quality. The development would meet both the transport and building emissions benchmarks for the Air Quality Neutral Assessment.

### **Fire Safety**

390. Policy D12 of the London Plan and policy S2 of the draft City Plan seek to ensure that major developments are accompanied by a Fire Statement setting out how the development would address fire safety in the design, construction and operation of the building. In accordance with these policy requirements, the application is accompanied by a fire statement which details the construction methods and materials that would be used, escape strategy, active and passive fire safety measures and access and facilities for the fire and rescue service.
391. The District Surveyor has reviewed the details submitted and originally considered that the fire-fighting facilities were insufficient, with a floor above 900sq.m (of which floors two to eight are) require two fire-fighting shafts. The District Surveyor also considers that insufficient numbers of evacuation lifts are proposed, which requires a lift in each core. However, as this is an extension to an existing (listed) building, where the new floors are below 900sq.m, the District Surveyor considers it reasonable to; (a) accept single fire-fighting shafts on a partially retained building subject to the lift not being dual entry; and (b) retain the proposed single lift, subject to adequate management procedures.
392. The fire strategy and its associated design interventions are partly justified in the case of a partially retained building, subject to the issues outlined above, particularly with the dual entry lift, being rectified via planning condition and at Building Regulations approval stage.

### **Suicide prevention**

393. The City Corporation has recently approved a guidance note "Preventing Suicide from High Rise Buildings and Structures" (2022) which advises developments to ensure the risk of suicide is minimised through

appropriate design features. These features could include planting near the edges of balconies and terraces, as well as erecting balustrades.

394. Policy DE5 of the draft submission City Plan 2036 advises that appropriate safety measures should be included in high rise buildings, to prevent people from jumping or falling.
395. The guidance explains that strategically placed thorny or prickly plants (hostile planting) can delay and deter an individual trying to gain access to a dangerous location. The type of plant, its appearance and practical deterrent capability across all seasons should be considered within any assessment. The site arrangements should also consider what steps will be taken if the plants die or wither, so as to remove or significantly reduce the deterrent effect.
396. The guidance explains that current legislation specifies appropriate heights and design for balustrades on balconies. Building Regulation K2 states the following:
- *K2 – (A) Any stairs, ramps, floors and balconies and any roof to which people have access, and  
(B) any lightwell, basement area or similar sunken area connected to a building,*
  - *Shall be provided with barriers where it is necessary to protect people in or about a building from falling.*
397. The guidance within the rest of the Approved Document K and the British Standard has a minimum height of 1.1m. The Regulation states that people need to be protected, and the designer should do a risk assessment and design the edge barrier accordingly, but with a minimum 1.1m height. Barriers and edge protection need to be appropriately designed and should take into consideration British Standard BS 6180: Barriers in and around buildings.
398. Designers need to consider the suicide risk of a building and design edge protection to an appropriate height. If it is considered that there is a significant risk of people attempting suicide, barrier heights should be higher. UK Health Security Agency (UKHSA) main design recommendations for fencing on high rise buildings and structures advises a barrier height of at least 2.5 metres high, no toe or foot holds, and an inwardly curving top is recommended as it is difficult to climb from the inside. The barrier should be easier to scale from the outside in case an individual wishes to climb back to safety. Developers must, as a minimum, comply with Building Regulation standards and, where feasible and practical, consider providing a barrier in line with UKHSA guidance.

399. Where a barrier is installed, consideration should be given to its ongoing maintenance. Appropriate servicing, testing and maintenance arrangements must be provided to confirm its ongoing effectiveness. This should include consideration of the material (potential failure mechanisms, installation by approved contractor), the potential for wind loading (fences must be resistant to adverse weather), the weight load and anti-climbing requirements. Consideration should be given to any object placed against a wall or edge at a high level that can be used as a step by a vulnerable individual.
400. Regarding the proposals, the balustrade height is proposed at 1.1m, the minimum required. It is noted that higher balustrades would have a design implication. As an alternate measure, the planting near the edges of the terraces is welcomed both in terms of suicide prevention, acting as a barrier to access to the balustrade, but also as above in terms of reducing overlooking. Consideration should be given to including hostile planting, with thorny or prickly plants, when undertaking the detailed design stage of the landscaping at terrace level through the recommended conditions. Consideration should be given to the level of suicide risk, and well-designed barriers of an appropriate height, in line with the Guidance Note "Preventing Suicide from High-Rise Buildings and Structures" when choosing species for these planters, and developing management strategies for the building and training for staff.

### **Health Impact Assessment**

401. Policy HL9 of the Proposed Submission City Plan 2036 advises applicants of major developments to assess the potential impacts their development may have on the health and well-being of the City's communities. The applicants have submitted a HIA which has been based on the NHS Healthy Urban Development Unit criteria and toolkit, with adaptations to take into account the particular circumstances of the City, to assess the possible impacts on the health and wellbeing of the City's communities. Policy GG3 of the London Plan, and TfL's Healthy Streets Indicators are also relevant.
402. The proposed development was satisfactorily assessed against 10 criteria relevant to the City of London. The assessment concluded that there would be a positive impact for 7 of the criteria, a neutral impact for 3 of the criteria and no negative impacts.
403. Table 5 of the HIA includes discussion of the criteria dealing with Access to Open Space and Nature. The proposal is assessed as having a positive

impact due to increased space and greenery on the proposed balconies but fails to acknowledge that the terraces would result in an element of overlooking and loss of privacy and amenity as the terraces would be directly facing buildings with residential occupancy.

404. Table 13 of the HIA includes discussion of the criteria dealing with Social Cohesion and Inclusive Design. The proposal is assessed as having a neutral impact. The assessment asks whether engagement and consultation with the local community has been carried out. The results of the consultation are summarised but there is a failure to recognise the concern from residents regarding loss of daylight, overlooking and noise from the terraces. Recognition of the concern would generate suggested mitigation measures. The synopsis of the results also fails to emphasise the strong concern expressed by residents who felt that the proposed additional community space was not necessary, and why they were of this view.
405. It is considered that the conclusion within the assessment of the criteria dealing with Access to Open Space and Nature being positive is incorrect, and instead should be marked as neutral, and should also have acknowledged the possible adverse effects on amenity for neighbouring residents.
406. Similarly, it is considered that the conclusion within the assessment of the criteria dealing with Social Cohesion and Inclusive Design should have been marked as 'uncertain' and the concerns of the residents regarding amenity impacts and community space accurately recorded.
407. In general, positive impacts of the development include:
- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment;
  - Provision of high-quality outdoor amenity spaces for office users which would provide much needed green space;
  - Provision of a high-quality public realm areas around the site, in particular on Golden Lane and Cripplegate Street frontages. This would provide pleasant greenery and dwell spaces for all users of the local area, with a sense of separation and protection from the road through the public realm landscaping, and a general enhancement to the attractiveness of the physical environment;
  - Capitalising on excellent PTAL rating with a car free building that would minimise vehicles travelling to the site, along with cycle parking that meet the London Plan requirements, to support active travel;

- Building and landscape design considering sustainability and climate change with photovoltaic panel (PV) renewable technologies and air source heat pumps;
  - Building design also providing an enhanced environment for workers and site users through greening measures to the facade and throughout, amenity terraces, natural ventilation as well as active travel measures.
408. Potential negative impacts identified would need to be mitigated during the construction and operational phases, for example through:
- Implementation of a travel plan to maximise uptake of active travel options;
  - Implementation of a 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;
  - Securing local employment and training initiatives via planning obligations; and
  - An Air Quality and Management Plan to minimise the impact of dust and particulates during the construction phase.
409. Any potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and S106 obligations.

#### **Microclimate and amenity conclusion**

410. Overall, the submission materials adequately address the impact the proposed development would have on its local surroundings, future tenants, surrounding neighbours and visitors in terms of wind, noise, fire, daylight and sunlight, and overshadowing.
411. With regards Daylight, Sunlight and Overshadowing, taking into account the BRE Guidance, it is considered that the impact of the proposed development is considered to be acceptable with regards nearby dwellings, in accordance with the requirements of Local Plan policies DM10.7, DM21.3, London Plan policy D6 and Draft City Plan Policy DE8.
412. The results of the wind microclimate assessment show the site is within a sheltered location and would provide suitable wind conditions for the



proposed activities, with some mitigation measures through landscaping required for the on-site terraces.

413. The details submitted relating to fire are suitable for the current stage, with further details required under Building Regulations legislation. Clauses in the S106 agreement would ensure the development would mitigate against any solar glare/light spill issues should these arise post-completion.
414. The development would provide an acceptable microclimate to its surrounding neighbours and nearby area.

### **Equality Impact**

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

415. In consideration of the proposed development, the Public Sector Equality Duty (PSED) requires the City of London to consider how the determination of the application would affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.
416. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:
- Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act;
  - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
417. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, sex, and sexual orientation. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.
418. This application has been assessed against the Equality Act 2010 and any equality impacts identified. As a result of the works, there would be a temporary closure of public realm surrounding the site during the construction phase for the building and public realm.

419. Whilst these arrangements would only be temporary, they may provide issues for those with mobility restrictions. It would need to be ensured that diverted footpaths and routes are fully accessible. Details of alternative routes would be provided in the Construction Logistics Plan which would be secured by condition. The Construction Logistics Plan would be developed in consultation with the City's Transportation team.
420. Once operational the scheme would be inclusive and accessible with appropriately designed internal and external spaces including accessible entrances, accessible cycle storage, wheelchair accessible lifts, accessible terraces, accessible toilets, blue badge parking on Fann Street (a short distance from the development, secured through S106) and revitalised, at grade public realm surrounding the site.
421. Subject to the provision of further details regarding diverted footpaths, it is not considered that the proposal would result in disadvantages or have a material impact on any persons who share a relevant protected characteristic as identified in the Equalities Act 2010.

#### **Public Benefits and the paragraph 202 NPPF balancing exercise**

422. 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".
423. Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. As the statutory duty imposed by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged, considerable importance and weight must be given to the desirability of preserving the setting of listed buildings, when carrying out the paragraph 202 NPPF balancing exercise. When considering the listed building consent application, the duty imposed by section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 applies and in considering whether to grant listed building consent special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

424. Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.
425. An assessment of the significance of designated heritage assets has been undertaken including the direct impacts on the Site as a Grade II Listed Building, the indirect impacts on setting and significance of surrounding designated heritage assets, including the neighbouring Conservation Area.
426. In this case, less than substantial harm has been identified to the Site as a result of the interventions to introduce level access to the historic main entrance to the east facade. This harm is considered at the lowest end of the scale, and has been assessed as negligible less than substantial harm.
427. As a result of the identified less than substantial harm to the designated heritage asset, paragraph 202 requires that this harm be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
428. The key social, environmental, and economic public benefits of the proposal are considered to be:
- Inclusive access: the proposal to introduce level, inclusive access into the building, both via the new entrance and through the historic element, and into the cultural and community floorspace, is welcomed. The work to alter the junction at the corner of Brackley and Viscount Streets with a raised table would provide a safer, level access route to the main entrance. Accessibility is a key tenet of important work the Corporation are aiming to achieve on making the Square Mile an inclusive environment to all. This benefit is attributed moderate weight.
  - Cultural Offering: the proposed cultural and community floorspace is a small portion of the overall building, but in comparison to the uplift in floorspace, would be a moderate contribution but would provide a positive contribution to the local community. The provision of such a space within the Culture Mile, between two major residential estates and nearby to other residential buildings and schools, and in a former civic building, is welcomed. A robust cultural plan, including management and implementation of the

space, is required through planning obligation to secure the benefit. Overall, the initial ideas for the space, as a 'co-design' space working with organisations such as POoR Collective and Heritage of London Trust, would provide a useful space within the local community, focusing on design and heritage in this historically rich building, with the potential to deliver a permanent exhibition celebrating the history of the site alongside the Cripplegate Foundation. The proposals for the design of the screen to the underside of the Barbican ramp include a public artwork by a lead-artist to be commissioned, as well as the potential for temporary artist-commissioned work within the arches on Viscount Street with links to the co-design produced in the cultural space, and would enhance the public realm. These benefits together are attributed modest weight.

- Public realm enhancements: The development would deliver enhanced public realm around this large island site. This would include the elimination of the current 'back of house' ramp down to the basement of the host property, bringing it to grade, and re-paving and landscaping Cripplegate Street with a good amount of planting. Similarly, the public realm works to Cripplegate Street would help enhance the visual amenity of the Barbican Exhibition Halls servicing yard, and improve the interface of the servicing yard and Cripplegate Street. The proposed art screen to 'block up' the underneath of the Barbican ramp would improve both the visual amenity of Cripplegate Street but also the safety of the street for pedestrians, particularly at night, by blocking up a potential hiding space in general accordance with Designing Out Crime principles. The public realm works to Golden Lane, although currently indicative, would provide greater legibility of the space immediately outside the Cripplegate Institute historic main entrance. The pavements around the site would be re-laid in Yorkstone as per the City of London public realm materials palette which would be a significant improvement over the existing mismatched tarmac. These benefits are attributed moderate weight.
- Access to historic interior: Access to the historic Cripplegate Institute through the use of the ground floor as a cultural space and cafe, as well as public access to the historic stair would allow for public appreciation of the former community building that is otherwise lost at present due to the site's current use as private office. This benefit is attributed minor weight.

429. Given the location of the building within the Central Activity Zone (CAZ), as identified by paragraph 83 of the NPPF, significant weight should be placed on the need to support economic growth and productivity, taking into account both local business need and wider opportunities for

development. The provision of a modern, sustainable office building with large uplift in office floorspace is welcomed within the context of the NPPF as well as policy CS1 of the Local Plan and the economic benefits are attributed moderate weight.

430. When applying the policy in paragraph 202 of the NPPF those public benefits are to be weighed against the negligible level less than substantial harm to the significance of Cripplegate House as a Grade II Listed Building. Considerable importance and weight should be given to the desirability of preserving this designated heritage asset and therefore to the harm that would be caused its significance, albeit this must be commensurate with that lowest level of harmful impact.
431. It is the view of Officers that the public benefits should together be afforded moderate weight, and that giving great weight to the negligible level less than substantial harm to the significance of the host building, and considerable importance and weight to the desirability of preserving the setting of this listed building, the public benefits of the proposal outweigh the harm to significance of this heritage asset.

### **CIL and Planning Obligations**

432. 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.
433. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
434. From 1<sup>st</sup> April 2019 Mayoral CIL 2 (MCIL2) supersedes the Mayor of London's CIL and associated section 106 planning obligations charging schedule. This change removes the Mayors planning obligations for Crossrail contributions. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).
435. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
<b>MCIL2 payable</b>	£452,270	£434,179	£18,091

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
<b>City CIL</b>	£186,375	£177,056	£9,319
<u>City Planning Obligations</u>			
<b>Affordable Housing</b>	£124,250	£123,008	£1,242
<b>Local, Training, Skills and Job Brokerage</b>	£74,550	£73,085	£745
<b>Carbon Reduction Shortfall (as designed)</b> <i>Not indexed</i>	£356,250	£356,250	£0
<b>Section 278 (Evaluation and Design)</b> <i>Not indexed</i>	£25,000	£25,000	£0
<b>S106 Monitoring Charge</b>	£3,500	£0	£3,500
<b>Total liability in accordance with the City of London's policies</b>	<b>£769,925</b>	<b>£755,119</b>	<b>£14,806</b>

### City's Planning Obligations

436. 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 (Construction)
- Delivery and Servicing Management Plan including consolidation and restricted hours
- Cycling Promotion Plan
- Construction Monitoring Costs
- Carbon Offsetting (on newbuild element only)
- Be Seen Energy Performance Monitoring
- Section 278 Agreement
- Public Realm (Specification & Management Plan)
- Cultural Implementation Strategy and Cultural Plan
- Television Interference Survey
- Wind Audit
- Solar Glare

437. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement. The scope of the s278 agreement may include, but is not limited to:

- Provision of a raised table at the Brackley Street and Viscount Street junction;
- Provision of a footway extension in conjunction with the raised table at the Brackley Street and Viscount Street junction;
- Relaying of footways adjacent to the site on Brackley Street, Viscount Street and Golden Lane in accordance with the City of London materials palette;
- Dropped kerbs on Brackley and Viscount Street in conjunction with servicing strategy
- Change to Traffic Management orders to provide improved loading opportunities along site frontage on Brackley Street and Disabled parking bay on Fann Street

- Public realm improvements to Cripplegate Street and Golden Lane in line with agreed landscaping details.

#### Monitoring and Administrative Costs

438. 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.
439. 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

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

#### **Human Rights Act 1998**

441. 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")).
442. Insofar as the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate. It is not considered that the proposal would result in an unacceptable impact on the existing use of the properties. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the CAZ and contributing to the City's primary business and professional services function, outweighs any minor adverse impacts and that such impact is necessary in the interests of the economic well-being of the country and is proportionate.
443. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising through impact on daylight and sunlight or other impact on adjoining



properties, it is the view of officers that such interference is in the public interest and proportionate.

**Conclusion on Planning Permission 22/000202/FULMAJ**

444. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance including SPDs and SPGs, the NPPF, the emerging Local Plan and considering all other material considerations.
445. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and come to a view as to whether in the light of the whole plan the proposal does or does not accord with it. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.
446. In this case the proposals are considered to comply with a number of policies in the development plan in particular those which relate to the provision of high-quality workplace-led office development in the City, high quality accessible public realm and sustainable development.
447. The proposal would deliver a high-quality flexible office led development that would meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of business. An uplift in office space would be provided that would accord with the City's objective to support a thriving economy and remain the world's leading international financial and professional services centre.
448. The office space would be complemented by a cultural and community offer within the site including cafe, and enhancements to the public realm to include additional greening and areas of dwell space for seating, with safety enhancements in particular to Cripplegate Street.
449. The proposal would transform the streets around the development, increasing vibrancy and activity across the ground floor plane where it currently lacks, in particular enhancing the pedestrian experience along Cripplegate Street. It would also deliver on aspirations for the North of the City Key Place Area as defined in the Local Plan 2015, and help towards delivering the aspirations of the Culture Mile, and Smithfield and Barbican Key Area of Change as outlined in the Draft City Plan 2036.
450. The scheme benefits from high levels of public transport accessibility, would be car-free and would promote cycling and walking as healthy modes of travel.

451. The building would be designed to high sustainability standards, incorporating integrated urban greening, climate resilience, targeting BREEAM 'Outstanding' and adopting circular economy and whole life carbon principles.
452. Objections have been received regarding the daylight and sunlight impact of the development, the design and heritage implications of the proposals, the proposed servicing and delivery strategy, neighbouring amenity including overlooking, a sense of enclosure and noise nuisance, and the works to the trees around the site, and that the proposal does not account for flexible working patterns and an apparent reduced need for office space, as the overarching themes.
453. It is acknowledged that the proposal would draw conflict with policies CS12 (1), DM12.1(1), DM12.3(1), DM16.5(4) and DM17.1(1) of the adopted Local Plan in respect of the less than substantial harm identified to the Site as a Grade II listed building, and on-street servicing and delivery strategy.
454. The heritage policies in the London Plan (in particular HC1) and in the Local Plan (in particular CS12) do not incorporate a balancing exercise as found in paragraphs 202 (relating to designated heritage assets) and 203 (relating to non-designated heritage assets). As a result, if a proposal results in any harm to the significance of a heritage asset, even if less than substantial and at the very lower end of the scale, will result in conflict with heritage policies. As set out above the application proposals conflict with policies CS12, DM12.1 and DM12.3, and London Plan policy HC1 in respect of heritage matters.
455. With regard to designated heritage assets, NPPF paragraph 202 requires that any less than substantial harm be balanced against the public benefits of the development proposal. The paragraph 202 balancing exercise is to be applied when considering the harm to the host building. That balancing exercise is set out earlier in this report.
456. It is the view of officers that giving great weight to the conservation of heritage assets, and considerable importance and weight to the desirability of preserving the special interest setting of the listed host building, the identified harm is outweighed by the public benefits. These public benefits are set out in the public benefits section of this report and include the proposed cultural offer, public realm, and accessibility enhancements.
457. The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That

payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to the general planning obligations there would be site specific measures secured in the S106 Agreement. Together these would go some way to mitigate the impact of the proposal.

458. It is the view of officers that the proposal complies with the development plan when considered as a whole and that other material considerations also indicate that planning permission should be granted as set out in the recommendation and the schedules attached.

### **Conclusion on Listed Building Consent 22/000203/LBC**

459. The proposal would result in some less than substantial harm, at the lowest end of the spectrum, failing to preserve the special architectural and historic interest and heritage significance of the listed building. This harm would result from the intervention to the historic facade to introduce level access, disrupting the historic facade composition with loss and alteration of historic fabric of interest. Otherwise, the works to the heritage facade would preserve special interest and heritage significance, subject to detail reserved for condition.
460. Overall, the proposal would conflict with Local Plan Policies CS 12, DM 12.1 and DM 12.3, draft City Plan 2036 policies S11 and HE1, London Plan Policy 7.8 and draft Publication London Plan Policy HC 1 and Section 16 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
461. When addressing the balancing exercise, this harm has been afforded considerable importance and weight, and account taken of the importance of the heritage asset as a grade II listed building in accordance with the advice given in paragraph 199 of the NPPF that great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).
462. It is the view of Officers that giving great weight to the conservation of this heritage asset, and considerable importance and weight to the desirability of preserving the special architectural and historic interest and heritage significance of the listed building, the identified harm to the significance of the designated heritage asset is outweighed by the public interest benefits associated with the proposed development.
463. Accordingly, Officers recommend that Listed Building Consent should be granted subject to conditions.



## **Background Papers**

### Application Documents

Cover Letter, DP9, 11 March 2022, updated 1 September 2022.

Planning Statement, DP9, March 2022, updated September 2022.

Design and Access Statement including Schedule of Listed Building Works, Hawkins\Brown, 10 March 2022.

Design and Access Statement Addendum, Hawkins\Brown, 1 September 2022.

Barbican Ramp Decorative Screen Parameters \_D\_GF\_103 P02, Andy Sturgeon Design, 1 September 2022.

Acoustic Planning Report, Sandy Brown, 9 March 2022.

Area Schedule updated P02, Hawkins\Brown, 2 September 2022.

Landscape Statement, Andy Sturgeon Design, March 2022.

Landscape Statement Revised Proposal, Andy Sturgeon Design, September 2022.

Urban Greening Factor Calculation, Andy Sturgeon Design, September 2022.

Outline Construction Logistics Plan, Blue Sky Building, 6 March 2022.

Outline Construction Management Plan, Blue Sky Building, March 2022.

Air Quality Assessment, Arup, 8 March 2022.

Arboricultural Impact Assessment, MDJ Arboricultural Consultancy Limited, 7 March 2022, updated 15 July 2022.

Biodiversity Statement including Preliminary Ecological Appraisal and BREEAM Pre-Assessment, The Ecology Partnership, March 2022.

Cycle Promotion Plan, Velocity Transport Planning, March 2022.

Daylight, Sunlight and Overshadowing Report, Point 2, March 2022, as revised September 2022.

Daylight & Sunlight Analysis, Point 2, 26 August 2022.

Radiance Report, Point 2, March 2022, as revised September 2022.

Light Pollution Report, Point 2, March 2022.

Time In Sunlight Assessment, Point 2, September 2022.

Energy Strategy, Arup, 9 March 2022.

Flood Risk Assessment and SUDs Strategy Report, London Structures Lab, March 2022.

Health Impact Assessment, Volterra, March 2022.

Healthy Streets Transport Assessment, Velocity, March 2022.

Listed Building Assessment, The Townscape Consultancy, March 2022.

Operational Waste Management Strategy, Velocity, March 2022.

Outline Fire Strategy Report, Trigon, 9 March 2022.

Response to District Surveyor, Trigon, 10 October 2022.

Pedestrian Level Wind Microclimate Assessment, RWDI, 10 March 2022.

Roof Types Scoping Plan, Hawkins\Brown, 29 July 2022.

Blue Roof Calculation Rev E, Bauder, 30 September 2022.

Wind Microclimate Statement of Conformity, RWDI, 30 August 2022.

Servicing Optioneering Addendum Note, Velocity, July 2022.

Statement of Community Involvement, Concilio, March 2022.

Stopping Up Plan (GLD\_HBA\_XX\_00\_SK\_A\_405520 P02), Hawkins\Brown, 14 September 2022.

Sustainability Statement, Arup, 9 March 2022.

Townscape, Visual Impact and Heritage Assessment, The Townscape Consultancy, March 2022, revised September 2022.

Whole Life-cycle Carbon Assessment Report, Hawkins\Brown, 10 March 2022.

Community Response Post-Submission Activity.

Cultural Plan & Strategy Update, FutureCity, September 2022.

### External

Objects (22/00202/FULMAJ):

Email, Victorian Society, 16 May 2022.

Email, Mr Fred Rodgers, 1 April 2022

Email, Mr Fred Rodgers, 5 April 2022

Comment, Mrs Gaila Leahy, 8 April 2022

Comment, Ms Margareta Kern, 11 April 2022

Email, Hazel Brothers, 16 April 2022

Comment, Mr Simon Frew, 16 April 2022

Comment, Mrs Brenda Szlesinger, 16 April 2022

Email, Mr P A Trent, 18 April 2022

Comment, Dr William McLean, 18 April 2022

Email, N & H Shah, 19 April 2022

Comment, Mrs Fiona Lean, 19 April 2022  
Comment, Mrs Nadine Forster, 19 April 2022  
Letter, Marie Morley, 20 April 2022  
Letter, Cobalt Management Ltd, 20 April 2022  
Letter, David and Sabine Lapish, 20 April 2022  
Letter, Priya Shah, 20 April 2022  
Comment, Mrs Brenda Szlesinger, 20 April 2022  
Comment, Ms Ruth Flaherty, 20 April 2022  
Comment, Dr Linda Partridge, 20 April 2022  
Comment, Mrs Christine Clifford, 20 April 2022  
Email, David Murray, 21 April 2022  
Email, Joanna Rodgers, 21 April 2022  
Email, Matthew Rees, 21 April 2022  
Email, Olivier Pidoux, 21 April 2022  
Email, Meera Shah, 21 April 2022  
Comment, Dr Elena Pinceti, 21 April 2022  
Comment, Ms Sarah Hudson, 21 April 2022  
Comment, Mr Andrew Harrison, 21 April 2022  
Comment, Ms Kate Wood, 21 April 2022  
Comment, Mr Christopher Ash, 21 April 2022  
Comment, Miss Louise Watson, 21 April 2022  
Comment, Mr Hamish Pollock Fraser, 21 April 2022  
Comment, Ms Jenny Watson, 21 April 2022  
Email, Gillian Bell, 22 April 2022  
Email, Samantha Logan, 22 April 2022  
Comment, Dr Clare Carolin, 22 April 2022  
Comment, Dr Benjamin Mohamed, 22 April 2022  
Email, Rebecca Smithers, 23 April 2022  
Comment, Matthew Rees, 23 April 2022  
Comment, Ms Nargis Christopher, 23 April 2022  
Comment, Huw Martin, 23 April 2022  
Comment, Ms Sarah Gaventa, 23 April 2022  
Email, John A Murch, 24 April 2022  
Email, Nigel Dixon, 24 April 2022  
Comment, Mr Aleksei Gornoi, 24 April 2022  
Comment, Mr Nicholas Tait, 24 April 2022  
Comment, Mr John Hayes, 24 April 2022  
Letter, Darrell Corner, 25 April 2022  
Letter, Mr Fred Rodgers, 25 April 2022  
Email, Golden Lane Residents Association, 25 April 2022  
Email, Linda Stubbs, 25 April 2022  
Comment, Miss Hazel Brothers, 25 April 2022  
Comment, Mr James Soane, 25 April 2022

Comment, Mrs Liz Davis, 25 April 2022  
Comment, Ms Fiona Jackson, 25 April 2022  
Letter, Barbican Association, 26 April 2022  
Email, Bev Bytheway, 26 April 2022  
Comment, Mrs Diana Lamb, 26 April 2022  
Comment, Mr Darren Ross, 26 April 2022  
Comment, Mr Matt Lambert, 26 April 2022  
Comment, Dr Jane Bickerton, 26 April 2022  
Email, Margaret and Christopher Gadsden, 27 April 2022  
Comment, Ms Amanda Chorn, 27 April 2022  
Comment, Ms Kathrin Speidel, 27 April 2022  
Comment, Ms Mary Gilchrist, 27 April 2022  
Comment, Dr Dimitri Varsamis, 27 April 2022  
Comment, Ms Dawn Frampton, 28 April 2022  
Comment, Mr Adam Bernet, 28 April 2022  
Email, Barbara Brownlee, 29 April 2022  
Comment, Mr John Ramsey, 29 April 2022  
Comment, Ms Jane Carr, 29 April 2022  
Comment, Miss Leonie Cumiskey, 29 April 2022  
Comment, Mr Minal Patel, 30 April 2022  
Comment, Mr Zonghui Guo, 30 April 2022  
Comment, Dr Peter Stewart, 30 April 2022  
Comment, Miss Emily Drake, 30 April 2022  
Comment, Ms Liza Bracey, 30 April 2022  
Comment, Ms R V, 30 April 2022  
Comment, Mr Tim Hudson, 1 May 2022  
Comment, Mr Robin Stainer, 1 May 2022  
Comment, Mr Neil Evans, 1 May 2022  
Comment, Miss Samantha Male, 1 May 2022  
Comment, Mr Terry Lamb, 1 May 2022  
Email, Amanda Muggleton, 2 May 2022  
Email, Ann Hodson, 2 May 2022  
Email, Michael and Jill Whittlesea, 2 May 2022  
Comment, Miss Molly Pardoe, 2 May 2022  
Comment, Mr Robin Pembroke, 2 May 2022  
Comment, Dr Eric Guibert, 2 May 2022  
Comment, Mrs Fiona Lean, 2 May 2022  
Comment, Mrs Elisabeth Reeve, 2 May 2022  
Comment, Mrs Helen Hulson, 2 May 2022  
Comment, Ms Feona Hamilton, 2 May 2022  
Comment, Miss Claire Paulus, 2 May 2022  
Comment, Miss Rebecca Smithers, 2 May 2022  
Comment, Ms M S May, 2 May 2022



Comment, Ms Stephanie Knight, 2 May 2022  
Comment, Mr Luke Cano, 2 May 2022  
Comment, Mr Ovijit Paul, 2 May 2022  
Email, Adrian Tanovic, 3 May 2022  
Email, Linda Thompson, 3 May 2022  
Email, Margaret King, 3 May 2022  
Comment, Mr Marcus Kern, 3 May 2022  
Comment, Ms K Davell, 3 May 2022  
Comment, Mr Chris Kemsley, 3 May 2022  
Comment, Ms Julia Chalkley, 3 May 2022  
Comment, Mr Roland Jeffrey, 3 May 2022  
Comment, Mr Ian Posner, 3 May 2022  
Comment, Ms Sara Marley, 3 May 2022  
Comment, Mr Mark Tyler, 3 May 2022  
Comment, Ms Julie Hudson, 3 May 2022  
Comment, Mrs Mitra Karvandi-Smith, 3 May 2022  
Comment, Mr Steve Goodman, 3 May 2022  
Comment, Dr Melanie Rey, 3 May 2022  
Comment, Mr Mark Szlesinger, 3 May 2022  
Comment, Mr Jan-Marc Petroschka, 3 May 2022  
Comment, Mrs Justina Badger, 3 May 2022  
Email, Nigel Smith, 4 May 2022  
Comment, Mr Niall Sloan, 4 May 2022  
Comment, Dr Nina Studer, 4 May 2022  
Comment, Mr Craig Young, 4 May 2022  
Comment, Dr Sonal Gadhvi, 4 May 2022  
Comment, Mr A D Bryan, 4 May 2022  
Comment, Dr Sam Morgan, 4 May 2022  
Email, Diana Lamb, 5 May 2022  
Email, Emma Deas, 5 May 2022  
Email, Peter J Berry, 5 May 2022  
Email, Sidney Wood, 5 May 2022  
Comment, Andrew Weir, 5 May 2022  
Comment, Mr Bruce Badger, 5 May 2022  
Comment, Mr Ian Burleigh, 5 May 2022  
Comment, Mrs Fiona Talbot, 5 May 2022  
Comment, Dr Sarah Hudson (on behalf of Friends of City Gardens), 5 May 2022  
Comment, Ms Ruth Cooke-Yarborough, 5 May 2022  
Comment, Mr Thomas Hodson, 5 May 2022  
Comment, Miss Gabby Kardar, 5 May 2022  
Comment, Mr Shawn Mach, 5 May 2022  
Comment, Mr Duncan Finch, 5 May 2022  
Comment, Ms Emma Matthews, 5 May 2022

Comment, Dr Mari Takayanagi, 5 May 2022  
Comment, Ms Alison Lamb, 5 May 2022  
Comment, Mr S Maddlain, 5 May 2022  
Comment, Mr Simon Bedford-Roberts, 5 May 2022  
Comment, Mr Stephen Chapman, 5 May 2022  
Comment, Mrs Sarah Belfort, 5 May 2022  
Email, Nicholas Cressey, 6 May 2022  
Email, Alderman David Graves, 6 May 2022  
Email, Gaila Leahy, 6 May 2022  
Letter, H and N Shah, 6 May 2022  
Email, Michael Callow, 6 May 2022  
Comment, Ms Giovanna Milia, 6 May 2022  
Comment, Ms Elizabeth King, 6 May 2022  
Comment, Aya Kudo, 6 May 2022  
Comment, Lucy Allen, 6 May 2022  
Comment, Lucy Hughes, 6 May 2022  
Comment, Mrs Melissa Collett, 6 May 2022  
Comment, Mr Andrew Hope, 6 May 2022  
Comment, Mrs Alison Hope, 6 May 2022  
Comment, Ms Em Hammond, 6 May 2022  
Comment, Ms Jane Hill, 6 May 2022  
Comment, Ms Helena Twist, 6 May 2022  
Comment, Ms Anna Bowles, 6 May 2022  
Email, Janet Pilch, 6 May 2022  
Email, Stanislav Lisniak, 7 May 2022  
Comment, Ms Yiming Zhong, 7 May 2022  
Comment, Mr Paul Singh, 7 May 2022  
Comment, Dr Zexiang Chen, 7 May 2022  
Comment, Mr Mutian Huang, 8 May 2022  
Comment, Mrs Dominie Craddock, 8 May 2022  
Comment, Mr Ieuan Ashman, 9 May 2022  
Comment, Mr James Couzens, 9 May 2022  
Comment, Ms Patrizia Lombardo, 12 May 2022  
Comment, Dr Jacqueline Shwarman, 12 May 2022  
Comment, Mr Julian Burgess, 12 May 2022  
Comment, Mr Iain Meek, 14 May 2022  
Comment, Miss Phoebe Kirk, 15 May 2022  
Comment, Mrs Olivia Chopin, 17 May 2022  
Comment, David Coleman, 18 May 2022  
Comment, Christopher Makin, 18 May 2022  
Comment, Mr William Davy, 18 May 2022  
Comment, Mr Martin Seiffarth, 19 May 2022  
Comment, Ms Lisa Shaw, 20 May 2022

Comment, Ms Beverly Levy, 20 May 2022  
Email, Mike Young, 21 May 2022  
Comment, Mr Stephen Slater, 22 May 2022  
Comment, Dr Paul Cardwell, 22 May 2022  
Email, John Vaughan, 23 May 2022  
Comment, Mrs Gail Simpson, 23 May 2022  
Comment, Miss Rachel Mortimer, 23 May 2022  
Comment, Ms Devon McCormack, 25 May 2022  
Comment, Mr Benont Grogan-Avignon, 28 May 2022  
Comment, Miss Jessica Biggs, 28 May 2022  
Comment, Ms Jane Northcote, 29 May 2022  
Comment, Ms Julie Tucker, 30 May 2022  
Comment, Miss Megan Patel, 30 May 2022  
Comment, Mr James Overton, 30 May 2022  
Comment, Mrs Gaila Leahy, 30 May 2022  
Comment, Mr Stephen Wilson, 31 May 2022  
Email, Helen Hulson, 1 June 2022  
Email, Francis Stevenson, 6 June 2022  
Comment, Mrs Fiona Lean, 11 August 2022  
Email, Michael Smart, 25 August 2022  
Comment, Mr James Soane, 13 September 2022  
Comment, Ms Louise Watson, 13 September 2022  
Comment, Mr Martin Seiffarth, 14 September 2022  
Comment, Mr Andrew Harrison, 16 September 2022  
Email, Andrew Rowe, 20 September 2022  
Comment, Dr Clare Carolin, 20 September 2022  
Email, Adrian Tanovic, 21 September 2022  
Comment, Mrs Michelle Praag, 21 September 2022  
Comment, Pat Smith, 21 September 2022  
Comment, J McMeakin, 21 September 2022  
Comment, Mr Daniel Monk, 23 September 2022  
Comment, Mr Peter Archbold, 24 September 2022  
Comment, Mr Francois-Xavier Villemin, 24 September 2022  
Comment, Sarah Hudson, 24 September 2022  
Comment, Mr Andrew Harrison, 25 September 2022  
Email, Elizabeth Reeve, 25 September 2022  
Email, Hazel Brothers, 25 September 2022  
Email, Bruce Badger, 26 September 2022  
Comment, Ms Marie Morley, 27 September 2022  
Email, Linda Stubbs, 27 September 2022  
Email, Martin York, 27 September 2022  
Comment, Ms K Dave, 28 September 2022  
Comment, Dr Peter Stewart, 28 September 2022

Email, Ms Margareta Kern, 29 September 2022  
Email, Ann Black, 29 September 2022  
Email, Gaila Leahy, 30 September 2022  
Letter, Barbican Association, 30 September 2022  
Email, Mary Gilchrist, 30 September 2022  
Comment, Mr Peter Cox, 30 September 2022  
Comment, Mrs Brenda Szlesinger, 30 September 2022  
Email, Mitra Karvandi-Smith, 1 October 2022  
Comment, Mr Thomas Allott, 1 October 2022  
Comment, Ms Kate Wood, 1 October 2022  
Comment, Dr Jane Bickerton, 2 October 2022  
Comment, Mr Ovijit Paul, 2 October 2022  
Comment, Ms Emma Matthews, 2 October 2022  
Email, Sara Marley, 3 October 2022  
Comment, Mr Shawn Mach, 3 October 2022  
Email, Marcus Kern, 3 October 2022  
Comment, David Murray, 4 October 2022  
Comment, Olivier Pidoux, 4 October 2022  
Comment, Ms Alison Lamb, 4 October 2022  
Comment, Mr Juan Fernandez-Alava Chiclana, 4 October 2022  
Comment, Ms Margot Barrow, 4 October 2022  
Email, Emma Deas, 4 October 2022  
Comment, Mr Andreas Shaw, 5 October 2022  
Comment, Mrs Fiona Lean, 5 October 2022  
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Comment, Dr Dimitri Varsamis, 7 October 2022  
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Email, Mr Fred Rodgers, 9 October 2022  
Comment, Ms Sarah Hudson, 10 October 2022  
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Comment, J D Craddock, 11 October 2022  
Comment, Mrs Jane Burke, 11 October 2022  
Comment, Mr Roland Jeffrey, 11 October 2022  
Comment, Mr David Graves, 11 October 2022  
Comment, Dr Cathy Ross, 11 October 2022  
Comment, Mrs Gail Simpson, 11 October 2022

Objects (22/00203/LBC):

Email, Mr Fred Rodgers, 1 April 2022

Comment, Dr Jane Bickerton, 4 April 2022  
Comment, Mrs Joan Crighton, 4 April 2022  
Comment, Ms Kaitlin Dave, 6 April 2022  
Comment, Ms Wendy Spurry, 6 April 2022  
Comment, Ms Marika May, 6 April 2022  
Comment, Mrs Gaila Leahy, 8 April 2022  
Comment, Ms Margareta Kern, 11 April 2022  
Comment, Ms Margareta Kern, 11 April 2022  
Email, Adrian Tanovic, 12 April 2022  
Comment, Dr Jane Bickerton, 12 April 2022  
Comment, Dr Nicholas Deakin, 13 April 2022  
Comment, Mr Richard Pitkethly, 14 April 2022  
Comment, Mrs Brenda Szlesinger, 16 April 2022  
Comment, Dr Christopher Newton, 18 April 2022  
Comment, Ms Margot Barrow, 19 April 2022  
Comment, Mrs Nadine Forster, 19 April 2022  
Email, David Murray, 21 April 2022  
Email, Joanna Rodgers, 21 April 2022  
Email, Matthew Rees, 21 April 2022  
Email, Olivier Pidoux, 21 April 2022  
Email, James Soane, 21 April 2022  
Email, Gillian Bell, 22 April 2022  
Email, Samantha Logan, 22 April 2022  
Comment, Mr David Murray, 22 April 2022  
Comment, Ms Sarah Hudson, 23 April 2022  
Email, John A Murch, 24 April 2022  
Letter, Mr Fred Rodgers, 25 April 2022  
Letter, Barbican Association, 26 April 2022  
Email, Bev Bytheway, 26 April 2022  
Comment, Mrs Diana Lamb, 26 April 2022  
Comment, Mr James Stothard, 26 April 2022  
Comment, Mr Edward Wardell-Yerburgh, 26 April 2022  
Comment, Ms Kathrin Speidel, 27 April 2022  
Comment, Ms Mary Gilchrist, 28 April 2022  
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Comment, Ms Julia Hamilton, 3 May 2022  
Comment, Mr Andrew Rowe, 3 May 2022  
Email, Nigel Smith, 4 May 2022  
Comment, Nigel Smith, 4 May 2022  
Comment, Dr Andrew Higgott, 4 May 2022  
Comment, Mr Julian Vickery, 4 May 2022  
Email, Diana Lamb, 5 May 2022  
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Comment, Mr Shawn Mach, 5 May 2022  
Comment, Ms Anne Corbett, 5 May 2022  
Comment, Ms Alison Lamb, 5 May 2022  
Comment, Mr Stephen Chapman, 5 May 2022  
Email, Alderman David Graves, 6 May 2022  
Comment, Ms Elizabeth King, 6 May 2022  
Comment, Ms Giovanna Milia, 6 May 2022  
Comment, Mr Andrew Hope, 6 May 2022  
Comment, Mrs Alison Hope, 6 May 2022  
Comment, Mr Jacques Parry, 6 May 2022  
Comment, Ms Jane Hill, 6 May 2022  
Comment, Mr Paul Singh, 7 May 2022  
Comment, Mr Julian Burgess, 12 May 2022  
Email, John Vaughan, 23 May 2022  
Comment, Miss Rachel Mortimer, 23 May 2022  
Comment, Mr Charles Bell, 23 May 2022  
Comment, Mr Justin Hancock, 24 May 2022  
Comment, Mrs Gaila Leahy, 30 May 2022  
Comment, Mr Steven Wilson, 31 May 2022  
Email, Michael Smart, 25 August 2022  
Comment, Mrs Jo Crighton, 13 September 2022  
Email, Hazel Brothers, 25 September 2022  
Email, Bruce Badger, 26 September 2022  
Email, Jacques Parry, 26 September 2022  
Comment, Mr Richard Lynch, 27 September 2022  
Email, Linda Stubbs, 27 September 2022  
Email, Ms Margareta Kern, 29 September 2022  
Email, Ann Black, 29 September 2022  
Email, Gaila Leahy, 30 September 2022  
Email, Kaitlin D'Avella, 30 September 2022

Email, Marika May, 30 September 2022  
Letter, Barbican Association, 30 September 2022  
Email, Mary Gilchrist, 30 September 2022  
Comment, Mr Michael Meade, 30 September 2022  
Email, Mitra Karvandi-Smith, 1 October 2022  
Comment, Dr Ben Fenby, 1 October 2022  
Comment, Mr Shawn Mach, 3 October 2022  
Comment, Ms Sara Marley, 3 October 2022  
Email, Marcus Kern, 3 October 2022  
Comment, Ms Alison Lamb, 4 October 2022  
Comment, Mr Juan Fernandez-Alava Chiclana, 4 October 2022  
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Comment, Dr Jane Bickerton, 6 October 2022  
Comment, Mrs Helen Hulson, 6 October 2022  
Comment, Mr Stephen Chapman, 6 October 2022  
Comment, Dr Dimitri Varsamis, 7 October 2022  
Comment, Ms Sarah Hudson, 10 October 2022  
Comment, Ms Sarah Hudson, 10 October 2022  
Comment, Dr Cathy Ross, 11 October 2022

Supports:

Comment, Ms Maxine Sacks, 28 April 2022

Other:

Email, London Borough of Islington, 11 May 2022.  
Email, Thames Water, 14 April 2022.  
Letter, Historic England, 7 April 2022, as authorised by the Secretary of State,  
7 April 2022.  
Follow-up letter, Historic England, 21 September 2022.  
Letter, Greater London Authority, 4 July 2022.  
Email, The Gardens Trust, 23 April 2022.  
Letter, London Parks and Gardens, 4 October 2022.

Internal

Memo, District Surveyor, 8 April 2022 and 13 October 2022.

Memo, Lead Local Flood Authority, 21 April 2022, 23 September 2022 and 17 October 2022.

Memo, Access Advisor, 11 May 2022 and email, 9 September 2022.

Email, City Gardens Manager, 10 June 2022, 13 June 2022 and 29 September 2022.

Memo, Air Quality Officer, 11 October 2022.

Comments, Transport Planner, 8 October 2022.

Comments, Planning Policy, 30 May 2022 and 20 October 2022.

Memo, Department of Markets and Consumer Protection, 27 May 2022.

Email, Cleansing Team, 10 May 2022.

Comments, Sustainability Officer, 30 May 2022.



## **Appendix A**

### **Relevant London Plan Policies**

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Policy SI2 (Minimising greenhouse gas emissions) requires that all new major development should be net zero-carbon. Major development proposals should

also include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

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

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

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

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

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

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

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

cycle and connect to local walking and cycling networks as well as public transport."

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

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

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

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

Policy T7 (Deliveries, servicing and construction) states that "development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

### **Relevant GLA Supplementary Planning Guidance (SPGs)**

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

### **Relevant Draft City Plan 2036 Policies**

S1 Healthy and inclusive city

HL1 Inclusive buildings and spaces

HL2 Air quality

HL3 Noise and light pollution

HL4 Contaminated land and water quality

HL9 Health Impact Assessments

S2 Safe and Secure City

SA1 Crowded Places

SA3 Designing in security

S3 Housing

HS3 Residential environment

S4 Offices

OF1 Office development

S6 Culture, Visitors and the Night -time Economy

CV2 Provision of Visitor Facilities

CV5 Public Art

S7 Smart Infrastructure and Utilities

S8 Design

DE1 Sustainability requirements

DE2 New development

DE3 Public realm

DE5 Terraces and viewing galleries

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

S14 Open spaces and green infrastructure

OS1 Protection and Provision of Open Spaces

OS2 City greening

OS3 Biodiversity

OS4 Trees

S15 Climate resilience and flood risk

CR1 Overheating and Urban Heat Island effect

CR2 Flood Risk

CR3 Sustainable drainage systems (SuDS)

S16 Circular economy and waste

CE1 Zero Waste City

S23 Smithfield and Barbican

S24 Culture Mile Implementation

SB1 Culture Mile Impacts

S27 Planning contributions

## **Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)**

Air Quality SPD (July 2017);  
City Lighting Strategy (October 2018);  
City Transport Strategy (May 2019);  
City Waste Strategy 2013-2020 (January 2014);  
City of London's Wind Microclimate Guidelines (2019);  
Planning Obligations SPD (May 2021);  
Open Space Strategy (2016);  
Office Use SPD (2015);  
City Public Realm (2016);  
Cultural Strategy 2018 – 2022 (2018).

## **Relevant Local Plan Policies**

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

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

### ***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.

### ***DM1.3 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.

## ***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.

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

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

### ***CS5 Meet challenges facing North of City***

To ensure that the City benefits from the substantial public transport improvements planned in the north of the City, realising the potential for rejuvenation and "eco design" to complement the sustainable transport infrastructure.

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

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

### ***DM10.1 New development***

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

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height,

building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;

b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;

c) appropriate, high quality and durable materials are used;

d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;

e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;

f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;

g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;

h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;

i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;

j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;

k) there is provision of amenity space, where appropriate;

l) there is the highest standard of accessible and inclusive design.

### ***DM10.2 Design of green roofs and walls***

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

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

### ***DM10.3 Roof gardens and terraces***

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

a) immediately overlook residential premises;

b) adversely affect rooflines or roof profiles;

- c) result in the loss of historic or locally distinctive roof forms, features or coverings;
  - d) impact on identified views.
- 2) Public access will be sought where feasible in new development.

#### ***DM10.4 Environmental enhancement***

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

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

#### ***DM10.7 Daylight and sunlight***

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

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

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

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

### ***CS11 Encourage art, heritage and culture***

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

#### ***DM11.2 Public Art***

To enhance the City's public realm and distinctive identity by:

- a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
- b) ensuring that financial provision is made for the future maintenance of new public art;
- c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

### ***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.

### ***DM12.3 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.

### ***DM12.5 Historic parks and gardens***

1. To resist development which would adversely affect gardens of special historic interest included on the English Heritage register.
2. To protect gardens and open spaces which make a positive contribution to the historic character of the City.

### ***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 (NO<sub>x</sub>).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

#### ***DM15.7 Noise and light pollution***

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

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

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

### ***DM16.1 Transport impacts of development***

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

### ***DM16.2 Pedestrian movement***

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.
2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:
  - a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
  - b) the shortest practicable routes between relevant points.
3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street

network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

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

### ***DM16.3 Cycle parking***

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

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

### ***DM16.4 Encouraging active travel***

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.

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

### ***DM16.5 Parking and servicing standards***

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

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

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

and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.

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

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

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

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

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

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

#### ***DM17.1 Provision for waste***

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

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

#### ***DM17.2 Designing out construction waste***

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

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;

- c) recycling of deconstruction waste for reuse on site where feasible;
- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

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

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

#### ***DM18.2 Sustainable drainage systems***

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

#### ***DM18.3 Flood protection and climate***

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

### ***CS19 Improve open space and biodiversity***

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

#### ***DM19.1 Additional open space***

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision

is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.

2. New open space should:

- a) be publicly accessible where feasible; this may be achieved through a legal agreement;
- b) provide a high quality environment;
- c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
- d) have regard to biodiversity and the creation of green corridors;
- e) have regard to acoustic design to minimise noise and create tranquil spaces.

3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

### ***DM19.2 Biodiversity and urban greening***

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

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

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

1. The amenity of existing residents within identified residential areas will be protected by:

- a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
- b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

***CS22 Maximise community facilities***

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

## **SCHEDULE**

APPLICATION: **22/00202/FULMAJ**

**Cripplegate House 1 Golden Lane London**

**Alteration and extension of the existing office building (Class Eg(i)) incorporating a local community/cultural space (Class Eg(i)/F2) at ground floor; to include additional floorspace through upward and infill extensions (+2485sq.m GIA uplift); altered and additional entrances; creation of office amenity terraces and plant enclosures; facade alterations including urban greening; new landscaping; 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 Fencing for the protection of any retained tree(s) including the roots shall be installed in accordance with plans and particulars to be submitted to and approved in writing by the Local Planning Authority and shall be erected before any equipment, machinery or materials are brought on to the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition and the ground levels within those areas shall not be altered, nor shall any excavation be made, without the written consent of the Local Planning Authority.  
REASON: In order to protect the trees on the site during building operations in accordance with the following policies of the Local Plan: DM10.4, DM19.2.
- 3 (a) Prior to demolition of the development: full details of the pre-demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.  
(b) Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, a detailed Circular Economy Statement (or an update to the approved Circular Economy Statement



to reaffirm the proposed strategy or demonstrate improvements) 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 and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to construction work commencing in order to establish the extent of recycling and minimised waste from the time that construction start.

- 4 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 London Plan.
- 5 Prior to the commencement of the development, excluding demolition, a detailed Whole Life-Cycle Carbon assessment (or an update to the approved Whole Life-Cycle Carbon assessment to reaffirm the proposed strategy or demonstrate improvements) 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.

- 6 Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority . The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received 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.

- 7 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.  
REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
- 8 Prior to the commencement of the development, excluding demolition, a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions

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

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

- 9 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.

- 10 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.

- 11 Details of the position and size of the green/blue roof(s), the type of planting and a substantial contribution of the green/blue roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.

REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in

accordance with the following policies of the Local Plan: DM18.2, DM19.2.

- 12 No doors, gates or windows at ground floor level shall open over the public highway.  
REASON: In the interests of public safety
- 13 Before any works including demolition are begun a survey of the highways and other land at the perimeter of the site shall be carried out and submitted to the Local Planning Authority showing the existing Ordnance Datum levels of the adjoining streets and open spaces.  
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 to create a record of the conditions prior to changes caused by the development.
- 14 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.  
REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.
- 15 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics

Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

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

- 16 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 233no. long stay pedal cycles and 14no. short stay pedal cycles. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking. 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 provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.
- 17 Before any works thereby affected are begun, the layout and the arrangement of the long stay and short stay cycle parking shall be submitted to and approved in writing by the Local Planning Authority. The cycle parking detailed in the approved arrangement plans and report shall thereafter be maintained in accordance with the approved plan(s) for the life of the building.  
REASON: To ensure the cycle parking is accessible and has regard to compliance with the London Cycling Design Standards in accordance with the following policy of the Local Plan: DM16.3 and London Plan policy: T5.
- 18 Changing facilities and showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.  
REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 19 No development other than demolition shall take place until the detailed design of all wind mitigation measures have been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until

the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.

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

- 20 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.
- 21 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 NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.  
REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction
- 22 Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.  
REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air

Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.

- 23 (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.
- 24 There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)
- REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.
- 25 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 (including payment of any agreed monitoring contribution)

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

- 26 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.
- 27 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.
- 28 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.
- 29 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 21:00 and 09:00 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.
- 30 The external terraces hereby permitted shall not be used or accessed between the hours of 21:00 on one day and 09:00 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.

- 31 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.

- 32 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: blue roof attenuation systems, biodiverse green roof system, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 38 l/s from the outfall provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 75.68m<sup>3</sup>;

(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.

- 33 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

- 34 Prior to the commencement of the relevant works, a final Lighting Strategy and Technical Lighting Design shall be submitted to and approved in writing by the Local Planning Authority, which should include details of:
- lighting layout/s;
  - details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure);
  - a lighting control methodology;
  - proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies;
  - all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass;
  - details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering.
- All works and management measures pursuant to this consent shall be carried out and maintained 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, CS15 and emerging policies DE1, DE2 and HL3 of the Draft City Plan 2036.

- 35 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, unless otherwise approved in writing by the local planning authority.

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.

- 36 Notwithstanding the details shown on the drawings hereby approved, the inclusion of a bin presentation area on Cripplegate is hereby precluded and full details of an alternate arrangement shall be provided pursuant to condition 39 of this permission.

REASON: To ensure a satisfactory waste collection and storage arrangement, and to provide a satisfactory public realm in line with the following Local Plan policies: DM10.1, DM17.1.

- 37 All unbuilt surfaces, including terraces/balconies and public realm, shall be treated in accordance with a landscaping scheme, including details of:
- (a) the position, size and types of planting of the green roof, its method of irrigation;
  - (b) details of the final Urban Greening Factor of the scheme;
  - (c) Irrigation, including provision for harvesting rainwater run-off from road ground and roof surfaces to supplement irrigation;
  - (d) Soil including details of the type and depths of soil and substrate
  - (e) Species and selection of trees including details of its their age, growing habit, girth of trunk, how many times transplanted, root development;
  - (f) Planting pit size and construction, tree guards;
  - (g) Details of all soft landscaping including species and contribution to enhance biodiversity;
  - (h) Seating;
  - (i) Paving materials;
  - (j) Maintenance plans for all proposed landscaping;
  - (k) Planters;
  - (l) Vertical greening including species, supporting structure, method of fixing, growing medium and method of irrigation.
  - (m) Contribution to biodiversity enhancement of all landscaping including greening, green walls and green roofs.
- to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.
- REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.
- 38 All new work and work in making good shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile, unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this permission.
- REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 39 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) details of alternate waste storage and collection facilities within the building;
- (b) details of ambulant disabled toilet with outward opening door to basement cycle facilities;
- (c) details of thresholds to entrances to east facade;
- (d) details of main office reception including steps and ramp gradient, distance between security gates and wheelchair-accessible WC;
- (e) details of accessible WC arrangements to cafe;
- (f) revised details of the transfer handling arrangements between floors to show alternate handling between floors;
- (g) details of entrances;
- (h) details of a typical bay on all facades;
- (i) details of glazing and fenestration including replacement glazing to east facade;
- (j) details of fins and solar shading measures;
- (k) details of ground floor facades;
- (l) details of Brackley Street facade;
- (m) details of Viscount Street facade;
- (n) details of Cripplegate Street facade;
- (o) details of Golden Lane facade;
- (p) details of junctions between historic Cripplegate Institute facade and proposed east, north and south elevations;
- (q) details of parapets, balustrades, BMU cradles and other excrescences at roof level;
- (r) details of external plant enclosures and plant;
- (s) details of external ducts, vents, louvres and extracts;
- (t) details of photovoltaic panels;
- (u) details of green walls and vertical landscaping including supporting structure, type and volume of growing medium, planting including species and varieties, method of irrigation, maintenance regime and junctions with adjacent vertical surfaces;
- (v) revised details of the fire fighting lifts to ensure single entry;
- (w) details of natural ventilation to include location of opening vents and extent of natural ventilation in relation to floorspace;
- (x) Particulars and samples of materials to be used in all external surfaces of the building.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM10.2, DM10.3, DM10.4, DM10.8, DM12.1, DM12.3, DM17.1, DM19.2.

- 40 The development shall provide:  
15,471 sq.m (GIA) of office floorspace (Class E) and 71 sq.m (GIA) of cultural/community floorspace (Class F2).  
REASON: To ensure the development is carried out in accordance with the approved plans.

- 41 The floorspace within the development marked as lobby/cafe on the floor plans at ground floor level hereby approved, shall be used for retail (Class E(a)) and/or cafe/restaurant (Class E(b)) and for no other purpose (including any other purpose within Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.  
REASON: To ensure that active public uses are retained to ground floor.
- 42 The floorspace within the development marked as community/cultural floorspace on the floor plans at ground floor level hereby approved, shall be used for local community (Class F2(b)) and for no other purpose (including any other purpose within Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.  
REASON: To ensure compliance with policy S6 of the Draft City Plan 2036.
- 43 If within a period of two years from the date of the planting of any tree, that tree or any tree planted in replacement for it, is removed, uprooted, destroyed, dies or becomes, in the opinion of the Local Planning Authority, seriously damaged, another tree of the same species and size as that originally planted shall be planted at the same place, unless the Local Planning Authority gives its written consent to any variation.  
REASON: In order to ensure the continued presence of trees on the site in the interest of visual amenity in accordance with the following policies of the Local Plan: DM10.4, DM19.2.
- 44 Prior to the commencement of the relevant part of the works, details shall be submitted to and approved in writing by the Local Planning Authority showing the viability of the planting of a new tree into the highway on the corner of Brackley Street and Viscount Street including details of trial holes and the likelihood of survival of the tree in this location.  
REASON: To ensure the viability and longevity of tree planting in this location in accordance with the following policies of the Local Plan: DM10.4, DM19.2. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated before the design is too advanced to make changes.
- 45 Before any works thereby affected are begun details shall be provided of the proposed protective measures for retained historic fabric and

features for the duration of works on site 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 so retained thereafter.  
REASON: To ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

- 46 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:

GLD-HBA-XX-XX-DR-A-080100 P02; GLD-HBA-XX-XX-DR-A-080101 P02; GLD-HBA-XX-XX-DR-A-080102 P02; GLD-HBA-ZZ-00-DR-A-080130 P01; GLD-HBA-ZZ-01-DR-A-080131 P01; GLD-HBA-ZZ-02-DR-A-080132 P01; GLD-HBA-ZZ-04-DR-A-080134 P01; GLD-HBA-ZZ-07-DR-A-080137 P01; GLD-HBA-ZZ-08-DR-A-080138 P01; GLD-HBA-ZZ-09-DR-A-080139 P01; GLD-HBA-ZZ-RF-DR-A-080140 P01; GLD-HBA-ZZ-B1-DR-A-080141 P02; GLD-HBA-XX-00-DR-A-080150 P02; GLD-HBA-XX-00-DR-A-080151 P02; GLD-HBA-XX-00-DR-A-080152 P02; GLD-HBA-XX-00-DR-A-080153 P02; GLD-HBA-XX-00-DR-A-080154 P02; GLD-HBA-XX-00-DR-A-080155 P02; GLD-HBA-XX-00-DR-A-080156 P02; GLD-HBA-XX-00-DR-A-080157 P02; GLD-HBA-XX-00-DR-A-080158 P02; GLD-HBA-XX-00-DR-A-080159 P02; GLD-HBA-XX-00-DR-A-080160 P02; GLD-HBA-XX-00-DR-A-080161 P02; GLD-HBA-XX-00-DR-A-080162 P02; GLD-HBA-XX-00-DR-A-080163 P02; GLD-HBA-XX-00-DR-A-080164 P02; GLD-HBA-ZZ-XX-DR-A-080210 P01; GLD-HBA-ZZ-XX-DR-A-080211 P01; GLD-HBA-ZZ-XX-DR-A-080212 P01; GLD-HBA-ZZ-XX-DR-A-080213 P01; GLD-HBA-XX-XX-DR-A-080220 P03; GLD-HBA-XX-XX-DR-A-080221 P03; GLD-HBA-XX-XX-DR-A-080222 P03; GLD-HBA-XX-XX-DR-A-080223 P03; GLD-HBA-XX-XX-DR-A-080224 P02; GLD-HBA-XX-XX-DR-A-080225 P02; GLD-HBA-XX-XX-DR-A-080226 P02; GLD-HBA-XX-XX-DR-A-080227 P02; GLD-HBA-ZZ-XX-DR-A-080310 P01; GLD-HBA-ZZ-XX-DR-A-080311 P01; GLD-HBA-XX-XX-DR-A-080320 P02; GLD-HBA-XX-XX-DR-A-080321 P02; GLD-HBA-XX-XX-DR-A-080330 P02; GLD-HBA-XX-XX-DR-A-080331 P02; GLD-HBA-XX-00-DR-A-310400 P01; GLD-HBA-XX-00-DR-A-310401 P01.

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

## INFORMATIVES

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

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

a full pre application advice service has been offered;

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

- 2 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We

would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk) . Application forms should be completed on line via <https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=04%7C01%7C%7Cbba7031c73fa4c2c1b9008d97f365d16%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637680693729110381%7CUnknown%7CTWFpbGZsb3d8eyJWljoIMC4wLjAwMDAiLCJQIjoiV2luMzliLjBjBTil6lk1haWwiLCJXVCi6Mn0%3D%7C1000&sdata=Fv2tSYARCTno6G8FVZjbb%2Bj0LroseLE6m79qiGerVkM%3D&reserved=0> . Please

refer to the Wholesale; Business customers; Groundwater discharges section.

- 3 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 4 During the construction phase of the development, the City of London Corporation encourages all owners/developers to commit to the principles outlined in the City of London Corporation's Local Procurement Charter, i.e.

- to identify opportunities for local small to medium sized businesses to bid/tender for the provision of goods and services;
- aim to achieve the procurement of goods and services, relating to the development, from small to medium sized businesses based in the City and the surrounding boroughs, towards a target of 10% of the total procurement spend;
- or where the procurement of goods and services is contracted out
- ensure the above two principles are met by inserting local procurement clauses in the tender documentation issued to contractors or subcontractors (further information can be found in our 'Guidance note for developers').

For additional details please refer to the City of London's 'Local Procurement Charter' and 'Local Procurement - Guidance Note for City Developers'. These documents can be found at [http://www.cityoflondon.gov.uk/Corporation/LGNL\\_Services/Environment\\_and\\_planning/Planning](http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Planning)

Further guidance can be obtained by contacting the 'City Procurement Project' which provides free advice to City based businesses and City developers. They can signpost you to local supplier databases, give one to one advice and provide written guidance via the City of London Corporation's Local Purchasing Toolkit and other resources.

To access free support in procuring locally please call 020 7332 1532 or email [city.procurement@cityoflondon.gov.uk](mailto:city.procurement@cityoflondon.gov.uk)

- 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 185GBP per sq.m

Retail 165GBP per sq.m

Hotel 140GBP per sq.m

All other uses 80GBP 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 75GBP per sq.m for offices, 150GBP per sq.m for Riverside Residential, 95GBP per sq.m for Rest of City Residential and 75GBP 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](http://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 This permission must in no way be deemed to be an approval for the display of advertisement matter indicated on the drawing(s) which must form the subject of a separate application under the Advertisement Regulations.
- 7 Where groundworks not shown on the approved drawings are to take place below the level of the existing structure (including works for underpinning, new lift pits, foundations, lowering of floor levels, new or replacement drainage, provision of services or similar) prior notification should be given in writing to the Environment Department in order to determine whether further consents are required and if the proposed works have archaeological implications.
- 8 This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.
- 9 This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation or Transport for London as Highway Authority; and work must not be commenced until the consent of the Highway Authority has been obtained.
- 10 Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.
- 11 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.

- 12 The Environment Department (Transportation & Public Realm Division) must be consulted on the following matters which require specific approval:
- (a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.
  - (b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the Department of the Built Environment Transportation and Public Realm Division is recommended to ensure the design of the building provides for the inclusion of street lighting.
  - (c) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway).  
You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. Please contact the Corporate Property Officer, City Surveyor's Department.
  - (d) Bridges over highways
  - (e) Permanent Highway Stopping-Up Orders and dedication of land for highway purposes.
  - (f) Connections to the local sewerage and surface water system.
  - (g) Carriageway crossovers.
  - (h) Servicing arrangements, which must be in accordance with the City of London Corporation's guide specifying "Standard Highway and Servicing Requirements for Development in the City of London".
- 13 The investigation and risk assessment referred to in the schedule of conditions must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme must be submitted to and approved in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report must be submitted to and approved in writing by the Local Planning Authority. The report of the findings must include:
- (i) a survey of the extent, scale and nature of contamination;
  - (ii) an assessment of the potential risks to:

- human health,
  - property (existing or proposed) including buildings, open spaces, service lines and pipes,
  - adjoining land,
  - groundwaters and surface waters,
  - ecological systems,
  - archaeological sites and ancient monuments;
- (iii) an appraisal of remedial options, and proposal of the preferred option(s).

This investigation and risk assessment must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

- 14 Consent may be needed from the City Corporation for the display of advertisements on site during construction works. The display of an advertisement without consent is an offence. The City's policy is to restrain advertisements in terms of size, location, materials and illumination in order to safeguard the City's environment. In particular, banners at a high level on buildings or scaffolding are not normally acceptable. The Built Environment (Development Division) should be consulted on the requirement for Express Consent under the Town & Country Planning (Display of Advertisements) (England) Regulations 2007.
- 15 Access for people with disabilities is a material consideration in the determination of planning applications. The City of London Corporation has published design standards giving advice on access for people with disabilities and setting out the minimum standards it expects to see adopted in the City buildings. These can be obtained from the City's Access Adviser, Chief Planning Officer and District Surveyor. Further advice on improving access for people with disabilities can be obtained from the City's Access Adviser. Your attention is drawn to the Disability Discrimination provisions of the Equality Act 2010 to ensure that disabled people are not significantly disadvantaged.

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

## **Appendix B: Stopping up plan**

STOPPING UP

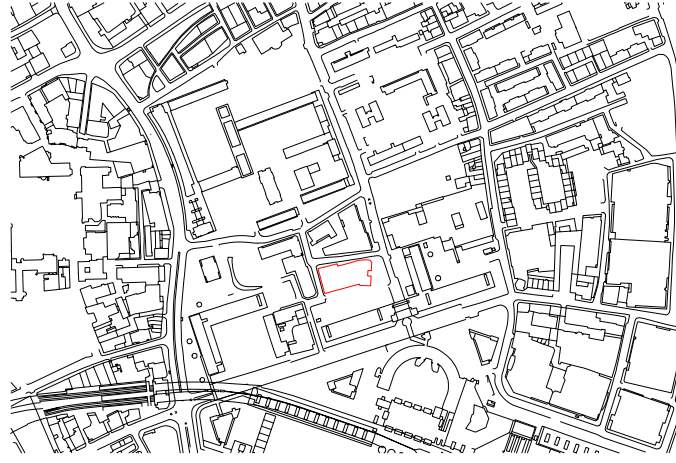
STOPPING UP

STOPPING UP

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No implied licence exists. This drawing should not be used to calculate areas for the purposes of valuation. Do not scale this drawing. All dimensions to be checked on the site by the contractor and such dimensions to be their responsibility. All work must comply with relevant *British Standards* and *Building Regulations* requirements. Drawing errors and omissions to be reported to the architect. To be read in conjunction with Architect's specification and other consultant information.

KEYPLAN



NOTES

This drawing is based on the following survey and record drawings:

Point 2 Site Elevations & Topographic Survey  
Michael Gallie 3D Point Cloud Post Strip-out Survey

Hawkins\Brown is unable to verify the accuracy of these drawings, so this information should be considered illustrative only. Do not scale off this drawing.

- Stage 3 Oversailing / Stopping Up
- Stage 2 Oversailing / Stopping Up
- Property Line  
from Michael Gallie Property  
Ownership Survey
- 200 Difference (mm) between Stage 2  
and Stage 3

Please note  
The property line shown is imported from the property ownership survey undertaken by Michael Gallie Partners (MGP). The thickness and accuracy of this line has been determined by MGP and has been geolocated for use.


P01	Oversailing & Stopping Up Update	14.09.22
Rev	Description	Date

159 St John Street  
London EC1V 4QJ

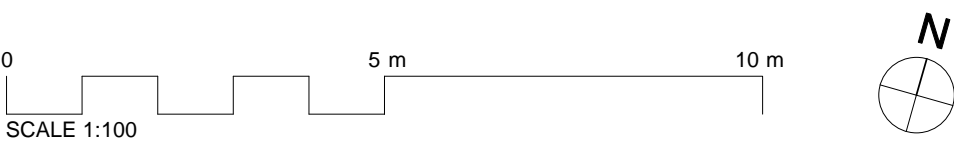
mail@hawkinsbrown.com  
hawkinsbrown.com

Hawkins\Brown

Project  
1 Golden Lane  
1 Golden Ln, Barbican, London  
EC1Y 0RR

Drawing  
Ground Floor Plan - Oversailing  
& Stopping Up

Scale @ A1 1 : 100		Date 14/09/22
Drawn By HBA		Checked By BBG
Job Number 210211	Status S2	Purpose of Issue For Information
Drawing No. GLD-HBA-XX-00-SK-A-405520		Rev P01



## **Appendix C: Daylight and Sunlight assessment methodology**

## **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.

#### Sunlight to Existing Buildings

**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).

## **Appendix D: BRE Report**

## BRE Client Report

### Review of daylight, sunlight and overshadowing, 1 Golden Lane, London

**Prepared for:** City of London  
**Date:** 12 October 2022  
**Report Number:** P123334-1001 Issue: 1

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## Prepared by

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Name      Gareth Howlett

Position    Senior Lighting Consultant

Date        12 October 2022

Signature   

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## Checked by

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Position    Principal Lighting Consultant

Date        12 October 2022

Signature   

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## 1 Introduction

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- 1.1.1 A planning application (22/00202/FULMAJ), has been submitted to the City of London for a proposal to redevelop an existing building, 1 Golden Lane, London. The application contains a daylight and sunlight report by Point 2 Surveyors Ltd '1 Golden Lane, City of London: Daylight, Sunlight and Overshadowing Report', Version 3, dated September 2022. This is supplemented by a "Radiance Report – The Denizen" Version 2 by Point 2 dated September 2022.
- 1.1.2 BRE have been commissioned by the City of London Corporation to evaluate the reports and addendums. The evaluation was to review the scope and methodology, text and conclusions of the material, but not verification of the calculations. This report gives the results of the evaluation.
- 1.1.3 This report updates our previous review with the updated versions of the Point 2 material for a revised design of the proposal.
- 1.1.4 The evaluation is based on the above material. No site visit was carried out for this review, but BRE have been to the area as part of a review of a nearby development in September 2016.





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## 2 Evaluation criteria

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### 2.1 General approach

- 2.1.1 The revised Point 2 report has evaluated loss of daylight and sunlight to existing properties using the latest BRE Report BR 209, "Site Layout Planning for Daylight and Sunlight, a guide to good practice", third edition, 2022.
- 2.1.2 As Point 2 states, the guidelines in the BRE Report are not mandatory and can be interpreted flexibly.

### 2.2 Loss of daylight

- 2.2.1 To assess the impact on the amount of diffuse daylighting entering existing buildings, the BRE Report uses the vertical sky component (VSC) on the window wall. This is one of the quantities calculated in the Point 2 report.
- 2.2.2 The BRE Report sets out two guidelines for vertical sky component:
  - 1. If the vertical sky component at the centre of the existing window exceeds 27% with the new development in place, then enough sky light should still be reaching the existing window.
  - 2. If the vertical sky component with the new development is both less than 27% and less than 0.8 times its former value, then the area lit by the window is likely to appear more gloomy, and electric lighting will be needed for more of the time.
- 2.2.3 The Point 2 report gives tables of vertical sky component 'before' and 'after' for the various surrounding windows.
- 2.2.4 The BRE Report also gives guidance on the distribution of light in the existing buildings, based on the areas of the working plane which can receive direct skylight before and after. If this area is reduced to less than 0.8 times its value before, then the distribution of light in the room is likely to be adversely affected, and more of the room will appear poorly lit. This guideline has also been addressed in the Point 2 report. The areas receiving direct skylight will depend on room layout, and the BRE Report does state that where room layouts are not known, the calculation cannot be carried out.
- 2.2.5 The Point 2 reports appear to have used known room layouts for The Denizen, Tudor Rose Court and The Cobalt Building. At other properties assumed layouts appear to have been used. Results using assumed layouts may carry considerable uncertainty.
- 2.2.6 In the separate "Radiance Report" Point 2 have calculated the average daylight factor (ADF) to rooms in surrounding buildings. The ADF is a measure of the amount of daylight in an interior. It depends on the room and window dimensions, the reflectances of interior surfaces and the type of glass, as well as the obstructions outside.
- 2.2.7 Appendix F of the 2011 second edition of the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice' second edition states that 'Use of the ADF for loss of light to existing buildings is not generally recommended. The use of the ADF as a criterion tends to penalise well daylighted existing buildings, because they can take a much bigger and closer





obstruction and still remain above the minimum ADFs recommended in BS 8206-2. Because BS 8206-2 quotes a number of recommended ADF values for different qualities of daylight provision, such a reduction in light would still constitute a loss of amenity to the room. Conversely if the ADF in an existing building were only just over the recommended minimum, even a tiny reduction in light from a new development would cause it to go below the minimum, restricting what could be built nearby.'

- 2.2.8 However, Appendix F of the second edition of the BRE Report also suggests that there are some situations where use of the ADF to assess loss of light could be appropriate. This includes where an existing building is one of a series of new buildings that are being built one after another. Since The Denizen has recently been constructed, the ADF values given are reviewed as part of this report. Results for other buildings are less relevant and have not been considered as part of this review.
- 2.2.9 The latest third edition of the BRE Report no longer recommends the use of the ADF in any context. However, since the previous version of the report used this methodology it is useful to directly compare with the results for the revised scheme.
- 2.2.10 The former British Standard BS 8206-2 recommends the following minimum values for ADF:
- |              |      |
|--------------|------|
| Bedrooms     | 1.0% |
| Living rooms | 1.5% |
| Kitchens     | 2.0% |
- 2.2.11 These are minimum values. The former Standard states that if a space has an ADF of 5% it will not normally need supplementary electric lighting provided the uniformity is satisfactory, and that a space with an ADF of 2-5% will normally need supplementary electric lighting.
- 2.2.12 Where a room has a shared use, the former British Standard states that the higher minimum value should apply. However, local authorities frequently accept the living room standard for a shared kitchen/living room, as a small kitchen would not be considered as a habitable room. This is a practical approach, as it is seldom in the final resident's interest to have a closed off, small kitchen which is completely artificially lit in order to force compliance with the Standard for the living room. In this case an ADF of 1.5% or more might be acceptable.
- 2.2.13 Point 2 have stated the factors used for reflectance and transmittance in the calculation of the ADF in Radiance. These generally appear reasonable. However, the total of the transmittance and reflectance values given for windows does not make sense. It is assumed the reflectance value stated is the proportion of light reflected that is not transmitted.

## 2.3 Loss of sunlight to dwellings

- 2.3.1 The BRE Report recommends that in existing buildings sunlight should be checked for all main living rooms of dwellings, and conservatories, if they have a window facing within 90° of due south. Access to sunlight should be calculated for the main window of each of the above rooms which faces within 90° of due south. If the centre of the window can receive more than one quarter of annual probable sunlight hours, including at least 5% of annual probable sunlight hours in the winter months between 21 September and 21 March, then the room should still receive enough sunlight. Any reduction in sunlight access below this level should be kept to a minimum. If the available sunlight hours are both less than the amount above, less than 0.8 times their former value, and annual probable sunlight hours more than 4% lower than



previously, then the sunlighting of the existing dwelling may be adversely affected. This guideline is used in the Point 2 report.

## 2.4 Loss of sunlight to gardens and open spaces

- 2.4.1 The BRE Report gives guidance on loss of sunlight to main gardens and open spaces. It states that in order to appear adequately sunlit at least half of the area should receive at least two hours of sunlight on 21<sup>st</sup> March. If a new development reduces sunlight to a space below this and the area able to receive two hours of sunlight on 21<sup>st</sup> March is less than 0.8 times the value before, the loss of sunlight is likely to be noticeable.
- 2.4.2 The Point 2 assessment appears to include the nearest open spaces with the potential to be impacted.

## 2.5 Environmental impact assessment

- 2.5.1 The Appendix I of BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice' (Second Edition) also gives guidance on assessing the environmental impact of a proposed development. Where the loss of skylight or sunlight fully meets the guidelines in the document, the impact is assessed as negligible or minor adverse. Where the loss of light is well within the guidelines, or only a small number of windows or limited area of open space lose light (within the guidelines), a classification of negligible impact is more appropriate. Where the loss of light is only just within the guidelines, and a larger number of windows or open space area are affected, a minor adverse impact would be more appropriate, especially if there is a particularly strong requirement for daylight and sunlight in the affected building or open space.
- 2.5.2 Where the loss of skylight or sunlight does not meet the guidelines in the BRE Report, the impact is assessed as minor, moderate or major adverse. Factors tending towards a minor adverse impact include:
- only a small number of windows or limited area of open space are affected
  - the loss of light is only marginally outside the guidelines
  - an affected room has other sources of skylight or sunlight
  - the affected building or open space only has a low level requirement for skylight or sunlight
  - there are particular reasons why an alternative, less stringent, guideline should be applied, for example an overhang above the window or a window standing unusually close to the boundary.
- 2.5.3 Factors tending towards a major adverse impact include:
- a large number of windows or large area of open space are affected
  - the loss of light is substantially outside the guidelines
  - all the windows in a particular property are affected
  - the affected indoor or outdoor spaces have a particularly strong requirement for skylight or sunlight, for example a living room in a dwelling or a children's playground.



- 2.5.4 As part of this review impacts have been assessed based on the results given in the revised Point 2 material.



### 3 Loss of daylight and sunlight to existing dwellings

#### 3.1 The site and surrounding areas

3.1.1 Figure 1, adapted from the Point 2 report, shows the development site and surrounding areas.



Figure 1. Plan showing the development site nearest surrounding buildings.

- 3.1.2 The nearest residential dwellings to the development site, the Welsh Presbyterian Church and the Prior Weston Primary School have been included in the Point 2 report.
- 3.1.3 The building to the south west on Bridgewater Street appears to be office spaces and has not been considered in the Point 2 assessment.
- 3.1.4 The number of open spaces analysed for loss of sunlight appears reasonable.
- 3.1.5 The results for each building are discussed below.



### 3.2 Tudor Rose Court

- 3.2.1 Results presented in the Point 2 report suggest that loss of daylight would meet the BRE guidelines.
- 3.2.2 The Point 2 report appears to use known layouts of the building. Living room windows would face northerly or meet the BRE guidelines for loss of sunlight.

### 3.3 The Cobalt Building

- 3.3.1 The Cobalt Building is located directly to the west of the development site.
- 3.3.2 The revised Point 2 report states that further research has been undertaken into the internal layout at the property. This appears to indicate that more accurate knowledge of room layouts has been used compared to the previous report.
- 3.3.3 The results presented suggest that seven of the 149 windows analysed would be below the VSC guidelines. The values would be marginal to the targets with relative reductions of VSC between 20.5% and 22.1% compared with the target of 20%. There would also be a number of windows which marginally meet the guidelines.
- 3.3.4 24 rooms of the 106 analysed would be below the daylight distribution guideline. 20 of these are bedrooms. The BRE Report states that bedrooms should be analysed, although they are less important. Three living areas and a kitchen would be below the guideline with areas able to receive direct skylight reduced by between 22.7% and 25.3%, compared to the guideline 20%.
- 3.3.5 In terms of overall numbers of windows and rooms below the BRE guidelines, the revised results presented are an increase compared to the previous Point 2 report reviewed (which used assumed layouts and suggested one window marginally below the VSC guidelines and 18 rooms below the daylight distribution guideline). The difference in results compared to the previous scheme appears to be at least partly because more accurate layouts have been used.
- 3.3.6 The loss of daylight impact would be considered minor. Although there are a number of windows / rooms below the BRE guidelines the results tend to be marginal to the targets. Worst-case daylight distribution results are to bedrooms which the BRE Report does state are less important in this context.
- 3.3.7 Loss of sunlight would not be an issue since windows with a view of the development face north of due east.

### 3.4 Ben Jonson House

- 3.4.1 Ben Jonson House is to the south of the site. The results suggest that all windows and rooms would meet the BRE guidelines. Some windows are marginal to the vertical sky component targets but are located under overhangs which can restrict daylight provision. Windows without the overhangs comfortably meet the guidelines.
- 3.4.2 Loss of sunlight would not be an issue since the windows face northerly.





### 3.5 Breton House

- 3.5.1 Breton House is to the east of the development site. The results presented suggest the BRE guidelines for loss of daylight and sunlight would be met.

### 3.6 The Prior Weston Primary School

- 3.6.1 The revised Point 2 report now includes results for this school, located to the north east of the proposal site. The nearest south west facing façade to the development site has been analysed.
- 3.6.2 The results suggest that all windows would meet the VSC guidelines. One room would be below the daylight distribution guideline with a large relative loss of area able to receive direct skylight. The windows to this space are located under an overhang and the room layout has been estimated by Point 2. External photographs of the school suggest this area is the staff entrance and therefore may have less requirement for daylight.

### 3.7 Cuthbert Harrowing House

- 3.7.1 Cuthbert Harrowing House is to the north of the development site.
- 3.7.2 The results suggest that four windows would be below the VSC guidelines. These would have very low existing values of VSC and the revised Point 2 report confirms that they are small windows above doors, but directly under an overhang. The BRE Report suggests that overhangs can restrict light from higher angles and force a reliance on an area directly opposite. The BRE Report suggests that the calculations could be repeated without the overhangs in place to assess their impact. The revised Point 2 report states "The BRE Guidelines and the BRE Review recommended the removal of balconies and/or overhangs to resolve the impact; a strategy decided against for full disclosure." Without the overhangs in place the window may be expected to meet the guidelines. In any case, since other windows, including what appears to be the main window (assuming the room lit by the small window is also lit by other windows), meet the VSC guidelines, loss of daylight would be expected to be small.
- 3.7.3 The revised Point 2 report now includes tabulated daylight distribution results, although these are based on assumed layouts and therefore carry uncertainty. Three rooms on the lower ground floor would be below the guidelines. These are located below overhangs. The calculations have not been repeated without the overhangs in place but may be expected to meet the guidelines without them.
- 3.7.4 The loss of daylight impact is assessed as minor.
- 3.7.5 Loss of sunlight would meet the BRE guidelines.

### 3.8 Bowater House

- 3.8.1 Bowater House is to the north of the development site. Results suggest there would be seven windows (that currently receive little daylight) below the VSC guidelines. The revised Point 2 report confirms that these are similar to the windows below the guidelines at Cuthbert Harrowing House. The daylight impact would be assessed as minor.
- 3.8.2 The revised Point 2 report includes tabulated results for daylight distribution based on assumed layouts. Results suggest the BRE guideline would be met.
- 3.8.3 Results suggest loss of sunlight would meet the BRE guidelines.



### 3.9 Welsh Presbyterian Church

- 3.9.1 This church is located to the north of the proposal site, behind The Denizen.
- 3.9.2 The results presented in the revised Point 2 report suggest that three windows would be below the VSC guidelines. These are located below an overhang which can restrict daylight provision. The results have not been repeated without the overhang in place, but it appears that two of the windows light a room which would be lit by other windows meeting the guidelines and the other lights an assumed toilet. Daylight distribution would be met. The impact would be assessed as minor only if the rooms impacted have a strong requirement for daylight from the windows below the guidelines.
- 3.9.3 Results suggest the minister's residence would meet the BRE guidelines.
- 3.9.4 Loss of sunlight would meet the BRE guidelines.

### 3.10 The Denizen

- 3.10.1 The Denizen is directly to the north of the development site and has recently been constructed. There would be losses of daylight outside the BRE guidelines.
- 3.10.2 47 of the 145 windows analysed would be below the VSC guidelines (compared with 56 windows for the previous design). There would be windows below the guidelines on the ground to ninth floors, but the sixth and seventh floors would be particularly impacted with ten and eleven windows below the guidelines respectively (compared to twelve and eleven windows previously). The relative losses of VSC to the windows impacted would generally be around 30% on these floors, compared to the guideline 20% and 40% for the previous design. There is a loss of over 50% VSC to one window, but this is to a living area lit by other windows which would meet the guidelines. Most of the windows impacted are to bedrooms, although some living room windows are affected, including a studio on the seventh floor where all three windows would be below the guidelines, with relative losses of VSC between around 28% and 33% (compared to 39% and 47% for the previous design). The updated design has therefore generally decreased the loss of daylight, but losses are still below the BRE guidelines.
- 3.10.3 The results presented suggest that 25 of the 61 rooms analysed would be below the daylight distribution guideline. This is the same as the previous design. 24 of the rooms impacted are bedrooms. The BRE Report does state that daylight distribution to bedrooms is less important.
- 3.10.4 The rooms on the seventh floor would see the largest relative reductions in the area able to receive direct skylight. Four rooms would be below the guideline, including a studio where the area able to receive direct skylight is reduced by around 63% (compared to nearly 75% with the previous design). This room would also have all three of its windows below the VSC guidelines, as discussed in 3.9.2. Two bedrooms would see a reduction over 50% (60% previously) with a further bedroom seeing a 29% reduction. The BRE guideline is 20%.
- 3.10.5 The ADF results presented in the "Radiance Report" reinforce the above results that although there would be losses of light on the ground to eighth floors, the largest impacts would be seen on the sixth to eighth floors. Absolute losses of ADF vary between 0.1% to 0.3% to some rooms on these floors (compared to 0.2% to 0.6% for the previous design). One bedroom on the eighth floor which would meet the bedroom 1% ADF recommendation currently would be reduced to below the recommendation with the proposed development in place.





- 3.10.6 There is therefore a daylight impact to The Denizen. Results suggest this would vary up the building with minor impacts on the lower floors. An additional document by Point 2 summarising the impacts appears mostly reasonable. The impact would generally be moderate on the sixth to eighth floors where there are large losses of daylight to bedrooms. The result for the worst-case living area on the seventh floor, which would be below both the VSC and daylight distribution guidelines, would be somewhat improved with the revised design, but would still be below the guidelines. We would suggest the impact here is at least moderate.
- 3.10.7 Some of the windows impacted are to balcony areas and the design of the building has windows set back into the façade under a small overhang. Overhangs can restrict daylight from higher angles and force a reliance on an area opposite. The BRE Report gives further advice in the case of overhangs and suggests the calculations could be repeated without them to check their impact. This has not been undertaken by Point 2. However, since the distance into the façade is shallow, the removal of the overhangs may not make a significant difference to the overall results.
- 3.10.8 The Point 2 report states that the windows to The Denizen are sited on the boundary and therefore restrict access to daylight. Appendix F of the second edition of the BRE Report gives guidance to further assess cases where an existing building has windows that are unusually close to the site boundary and may take more than their fair share of light. It suggests targets could be based on a "mirror-image" of the existing building an equal distance away on the other side of the boundary (in this case the middle of Brackley Street). This guidance has not been mentioned in the Point 2 report and "mirror-image" results are not presented.
- 3.10.9 For loss of sunlight the results in the revised Point 2 report suggest that two living areas would be below the BRE guidelines for winter sunlight. The loss of sunlight impact is assessed as minor.

### 3.11 Loss of sunlight to open spaces

- 3.11.1 Here the BRE guidelines recommend that at least half a garden or amenity area should receive at least 2 hours of sunlight on March 21. If, in an existing outdoor space, the area receiving at least two hours of sunlight is less than this and less than 0.8 times the former area, then the loss of sunlight is significant.
- 3.11.2 The Point 2 report appears to assess an appropriate number of open spaces. All areas analysed would meet the BRE guidelines.
- 3.11.3 The result is marginal to the guideline at the space in front of Cuthbert Harrowing House with an area able to receive at least two hours of sunlight after development 0.84 times that before.
- 3.11.4 The entire roof terrace at the Prior Weston Primary School is assessed as one area. The results presented suggest there would be an area to the north west corner, by building massing at the school, which would be able to receive at least two hours of sunlight before, but not after development. If the roof terrace were split into different assessed areas, this western side should still be adequately sunlit.





## 4 Conclusions

- 4.1.1 This report has reviewed the Point 2 reports '1 Golden Lane, City of London: Daylight, Sunlight and Overshadowing Report', Version 3, dated September 2022 and 'Radiance Report – The Denizen' Version 2 dated September 2022. The assessment has been carried out against the guidelines in the BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice'.
- 4.1.2 This report updates our previous review with the updated versions of the Point 2 material for a revised design of the proposal.
- 4.1.3 There would be a minor daylight impact to The Cobalt Building; seven windows would be below the VSC guidelines, and 24 rooms would be below the daylight distribution guideline. The results tend to be marginal to the targets. Worst-case daylight distribution results are to bedrooms which the BRE Report does state are less important in this context. Compared to the previous scheme this is an increase in the number of windows and rooms being below the guidelines. This appears to be due to more accurate layouts being used.
- 4.1.4 The Point 2 report suggests that one room at the Prior Weston Primary School would be below the daylight distribution guideline. However, external photographs of the school suggest this area is the staff entrance and therefore may have less requirement for daylight.
- 4.1.5 At Cuthbert Harrowing House and Bowater House results suggest there would be some currently poorly daylighted windows below the guidelines. The revised Point 2 report confirms that they are small windows directly under an overhang. If the calculations were repeated without the overhangs in place (as suggested in the BRE Report but not carried out by Point 2) the windows may be expected to meet the guidelines. In any case, since other windows, including what appears to be the main window (assuming the room lit by the small window is also lit by other windows), meet the VSC guidelines, loss of daylight would be expected to be small. Three rooms on the lower ground floor, under overhangs, at Cuthbert Harrowing House would also be below the daylight distribution guideline. The loss of daylight impact would be assessed as minor.
- 4.1.6 At the Welsh Presbyterian Church there would be a minor impact if the rooms lit by three windows below the VSC guidelines have a strong requirement for daylight.
- 4.1.7 The largest impact to daylight would be to the recently constructed The Denizen. The updated design has generally decreased the largest losses of daylight, but there are still 47 windows and 25 rooms below the BRE guidelines. Results suggest the impact would vary up the building with minor impacts on the lower floors and at least moderate on the sixth to eighth floors where there are large losses of daylight to bedrooms. A worst-case living area on the seventh floor would still be below the VSC and daylight distribution guidelines with the revised scheme, although the values would be somewhat improved. We would suggest the impact is at least moderate for this room. Two living areas would be below the winter sunlight guidelines. The loss of sunlight impact would be assessed as minor.
- 4.1.8 Loss of sunlight to nearby open spaces would meet the BRE guidelines.