

<b>Committee:</b>	<b>Date:</b>
Planning Application Sub-Committee	31 January 2023
<b>Subject:</b> 8 - 12 New Bridge Street London EC4V 6AL Partial demolition of Fleet House and full demolition of St Bride's Tavern Public house (retention of basement levels) and the erection of a part replacement building with roof extension to provide an 8 storey building for office use (Class E) at levels 1-8, with office lobby (Class E) and commercial space (Class E) at ground floor and mezzanine level, and public house (sui generis) at ground floor level and part basement level; new pedestrian and servicing route from St Brides Lane to Bridewell Place.	<b>Public</b>
<b>Ward:</b> Castle Baynard	<b>For Decision</b>
<b>Registered No:</b> 22/00622/FULMAJ	<b>Registered on:</b> 7 July 2022
<b>Conservation Area:</b> Fleet Street	<b>Listed Building:</b> No

### Summary

The proposed building following, refurbishment and extension, would be 7,701 sqm GIA comprised of:

- Office space (Use Class E) proposed from levels 1 to 8 (7212 sq.m);
- Cafe space (Use Class E) proposed at mezzanine and ground floor (120 sq.m GIA); and
- A Public House at ground floor and part basement level (369 sq.m GIA).

The development would include a new pedestrian, cycle and service route at the rear of the building, providing access from Bridewell Place to Bride Lane.

The proposals seek to minimise demolition works. The public house building is to be demolished in line with the consented scheme. The facade will also be removed along with the demolition of the top floor 'penthouse' storey.

23 representations have been received objecting to the proposals. These were received during the first round of formal public consultation. The second round of formal consultation was carried out following receipt of amendments

to the proposals. No new or amended representations have been received.

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

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

The proposed office accommodation supports the aims of Local Plan policy CS1 and the emerging City Plan policy S4 and would provide flexible office floorplates for workers which are designed to meet the needs of a wide range of potential occupiers, in accordance with Policy DM1.3 in the adopted Local Plan and Policy OF1 in the emerging City Plan.

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 would improve the existing site condition. The proposals make an effective use of a limited land resource and enhance the buildings relationship with the adjacent public realm. The proposals optimise the sites capacity for growth, in conformity with City of London Local Plan Policies CS10, DM 10.1 and London Plan Policies D3 and D8.

Building heights in the area are generally not uniform, there is a subtle variation in building heights in the wider neighbourhood to the west, south and east. As a result, the proposed height and massing appears comfortable in context and is considered to be in accordance with City of London Local Plan Policies CS10 and London Plan Strategic Policy S8.

It is considered that the provision of a new public house would result in a new social, community and cultural facility on the site offering a comparable facility to the existing public house, alongside the office development. The Sui Generis Public House use would be re-provided with an enhanced active frontage and the proposals would, therefore, accord with policy HC7 of the

London Plan and policy CV1 of the emerging City Plan 2036.

The architects have successfully integrated the pub facade with the contemporary elevations of the office accommodation above. The design and appearance of the proposed pub is considered to be exemplary, and clearly identifiable as a pub, and it would make a positive contribution to the Conservation Area.

There are no identified local non designated heritage assets which would be affected by the development. The existing office building is not considered to be a non-designated heritage asset. The existing pub does make a positive contribution to the Conservation Area and has been assessed as to whether it is of sufficient individual heritage significance to be considered a non-designated heritage asset. It is considered it is not a non-designated heritage asset.

The proposal would preserve the character, appearance and heritage significance of the Fleet Street Conservation Area. The proposal, by way of impact on setting, would preserve the heritage significance of numerous heritage assets, and an appreciation of that significance. The proposal would accord with London Plan Policy HC1, Local Plan Policies CS 12, DM 12.1 and DM 12.2 and policies in the NPPF.

The proposals would be visible in some River Prospect Views but would not harm the characteristics or composition of these views. The St Paul's heights grid would be adhered to and views of St Paul's Cathedral would be protected. Views of St Bride's and its iconic Steeple would be preserved in local, ground level views in close proximity to the site, high level views and in the riparian river prospect views. The massing has been sculpted to protect views of St Bride's from New Bridge Street, where the chamfer on the upper floors of the southeast corner align with views of the Steeple. The proposals would be compliant with Local Plan Policy CS 13 and emerging City Plan Policy S13, and associated guidance in the Protected Views SPD.

Additional areas of Public Highway are to be dedicated on the New Bridge Street frontage of the site totalling 12.05sqm and this results in an overall net gain in Public Highway of 4.77sqm.

The impact of the proposed development on daylight and sunlight levels on the nearby properties would be negligible. It is considered that the thermal comfort in and around the site, would be acceptable in accordance London

Plan Policy D8, Policy D9 and emerging City Plan policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London. Wind conditions at street level are unlikely to be exacerbated by the proposed development.

It is the view of officers that the proposal complies with the development plan when considered as a whole. Accordingly, the presumption in favour of sustainable development in paragraph 11 of the NPPF means that the proposed development should be approved without delay. The other important material considerations that exist in this case reinforce that presumption. Indeed, they are of such significance and should attract sufficient weight to justify the grant of planning permission even if a different planning judgment was reached as to compliance with the plan overall.

Accordingly, Officers recommend planning permission should be granted subject to the conditions set out the attached schedule.

## **Recommendation**

- (1) That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:
  - (a) Planning obligations and other agreements being entered into under Section 106 of the Town 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

## APPLICATION COVER SHEET

Fleet House, 8-12 New Bridge Street

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	8 storeys = AOD 33.02m 10 storeys = AOD 39.22m (to top of plant)		8 storeys = 34.2m 9 storeys = 37.2m 10 storeys = 40.3m 11 storeys = 42.2m (top of screened plant, not inc. lift overrun)	
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Class E Office	5,001 sqm	7,212 sqm	(+2,211 sqm)
	Retail (A3, Café & A2, Betting Shop)	428 sqm	120 sqm Retail (Flexible Class E)	(-308 sqm)
	Sui Generis (Pub)	346 sqm	369sqm	(+23 sqm)
	TOTAL	5,775 sqm	7,701 sq m	
			TOTAL UPLIFT:	2,700sqm
3. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	• 250		• 515	
4. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	0	Car parking spaces	0
	Cycle long stay	0	Cycle long stay	112 (Compliant)
	Cycle short stay	0	Cycle short stay	12 (Overprovision on Uplift)
	Lockers	No	Lockers	Yes
	Showers	No	Showers	Yes
	Changing facilities	No	Changing facilities	Yes
5. HIGHWAY LOSS / GAIN	1. 7.44 sqm proposed to be stopped up 2. 12.05 sqm proposed to be dedicated <b>GAIN - 4.61 sqm</b>			
6. PUBLIC REALM GAIN	1. 125 sqm pedestrian route			
7. STREET TREES	EXISTING		PROPOSED	
	• 1 existing tree		• 1 tree retained	
8. SERVICING VEHICLE TRIPS	EXISTING		PROPOSED	
	• 24 trips per day		• 12 trips per day (Off-site consolidation proposed)	

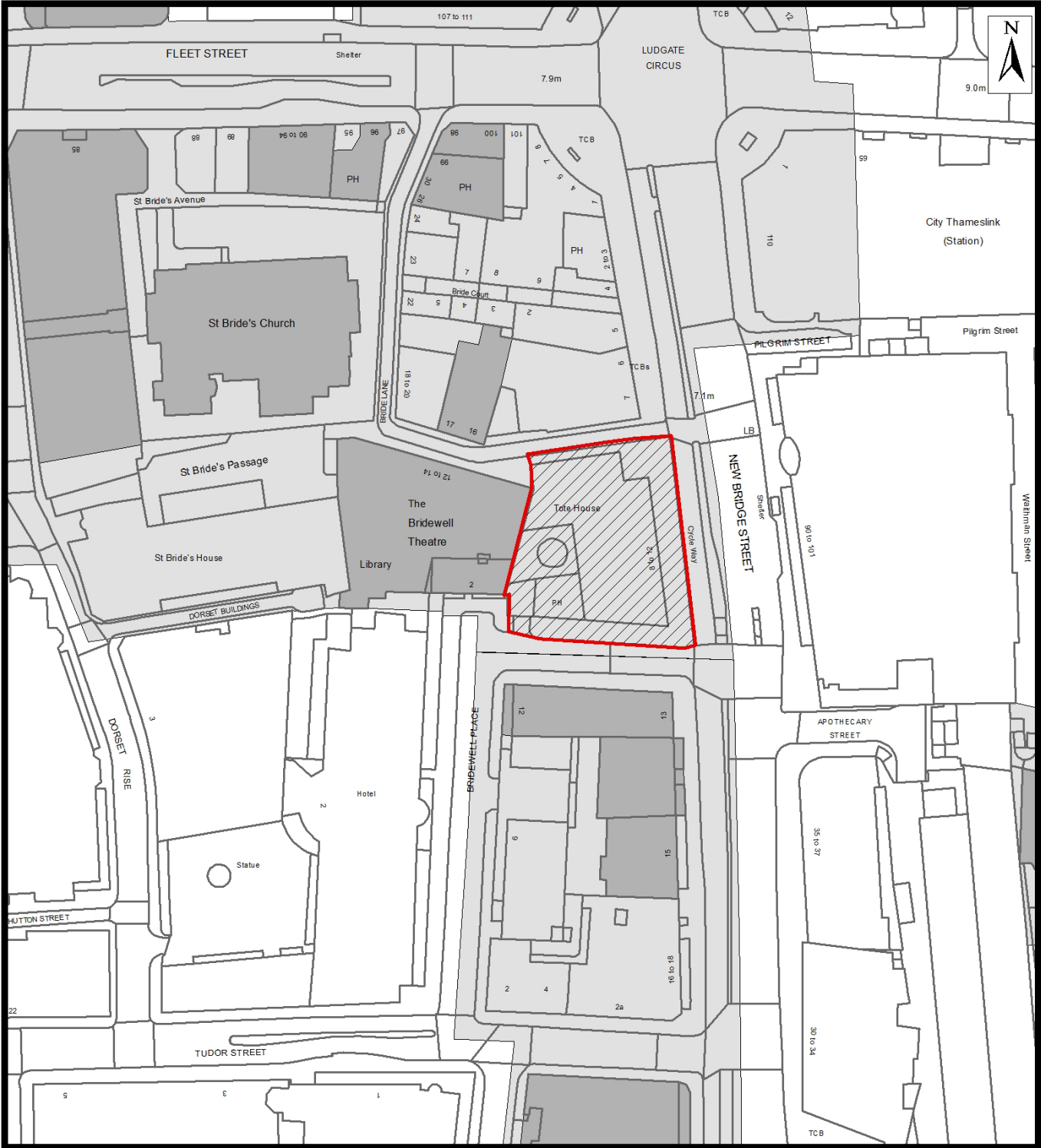
9. VOLUME OF RETAINED FABRIC	<div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div></div> <div>72 %</div>
10. OPERATIONAL CARBON EMISSION SAVINGS	<div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div><div></div></div> <div>68 %</div> <div><div>68% improvement against Part L 2013 using SAP 10 carbon factors (policy target 35% improvement)</div></div>
11. OPERATIONAL CARBON EMISSIONS	<div><div>94,090 kgCO<sub>2</sub>e/annum</div><div>12.15 kgCO<sub>2</sub>e/m<sup>2</sup>/annum</div><div>729 kgCO<sub>2</sub>e/m<sup>2</sup> over 60 years</div></div> <div>(values from CIBSE TM54 exercise, covers Module B6 only and includes the decarbonisation of the grid)</div>
12. EMBODIED CARBON EMISSIONS	<div>PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS</div> <div><div><div>WLC Benchmark by stage kgCo<sub>2</sub>e/m<sup>2</sup> GIA</div><div><div><div>1500</div><div>1000</div><div>500</div><div>0</div></div><div><div><div>600</div><div>950</div></div><div><div>370</div><div>600</div></div><div><div>403</div><div>750</div></div></div><div><div>WLC benchmark</div><div>Aspirational WLC</div><div>Proposed</div></div><div><div>Modules A1-A5</div><div>Modules B-C</div></div></div></div><div><div>TOTAL: 12,814,687 kgCO<sub>2</sub>e/60 years</div></div></div>
13. WHOLE LIFE CYCLE CARBON EMISSIONS (kgCo <sub>2</sub> e/m <sup>2</sup> GIA)	<div><div><div>655</div><div>385</div><div>378</div><div>18</div></div><div><div>Product and construction</div><div>Use</div><div>Op. energy and Water use</div><div>End of Life</div></div><div><div>A1-A5</div><div>B1-B5</div><div>B6-B7</div><div>C1-C4</div></div></div> <div>TOTAL: 17,338,671 kgCO<sub>2</sub>e/60 years</div>
14. TARGET BREEAM RATING	<div><div>Outstanding (policy target Excellent or Outstanding)</div><div><div>G</div><div>VG</div><div>EXC</div><div>OUT</div></div></div>
15. URBAN GREENING FACTOR	<div><div>0.28 (policy target 0.3)</div></div>

**16. AIR QUALITY**

Air Quality Neutral (policy target AQN)






# Site Location Plan



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ADDRESS:  
Fleet House, 8-12 New Bridge Street

CASE No.  
22/00622/FULMAJ

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



ENVIRONMENT DEPARTMENT

## Photographs



1. View from New Bridge Street looking north



2. View from New Bridge Street looking south





3. View of St Brides Tavern

## **Main Report**

### **Site and Surroundings**

1. The site, Fleet House, 8-12 New Bridge Street which is a 1950's office building with commercial uses at ground floor. St Bride's Tavern, a public house, accessed off Bridewell Place, also forms part of the site.
2. Fleet House comprises a 7/8 storey (up to 39.22 m AOD) steel frame building with a primary frontage facing onto New Bridge Street to the east. A courtyard servicing area is located to the rear of Fleet House; there is vehicle access to the courtyard via an undercroft from Bridewell Place.
3. St Bride's Tavern is a 4-storey building also built in the 1950's which fronts onto Bridewell Place. The existing floorspace for the entire site totals 5,612 sqm GIA. The public house has now closed as the tenant's lease has expired.
4. The site falls into the following Development Plan allocations/designations:
  - The Fleet Street Conservation Area (the site is also adjacent the Whitefriars Conservation Area);
  - Within the City Flood Risk Area;
  - Within Flood Zone 1 (low probability of flooding);
  - The site sits mainly outside of the St Paul's Height Policy area, although the south east corner of the application site boundary just falls within it.
5. The site is immediately bound:
  - To the east by New Bridge Street, a four-lane major road which runs from Blackfriars Bridge to Ludgate Circus;
  - To the north, the site is bounded by Bride Lane a single lane road;
  - To the south, the site is bounded by Bridewell Place, a one-way street linking Tudor Street and New Bridge Street; and
  - To the west, is the Bridewell Theatre and space occupied by the St Bride's Foundation; and 2 Bridewell Place.
6. The area surrounding the site is a mix of predominantly 19th and 20th Century buildings, varying in architectural design and scale with building heights varying between five to nine storeys.
7. As well as being within the Fleet Street Conservation Area, there are a number of Designated Heritage Assets in the surrounding area. Those in the immediate area around the site include:

- Church of St Bride (Grade I and Skyline Feature);
- Former Offices of the Bridewell Hospital (Grade II\*);
- St Brides Foundation Institute and Library (Grade II);
- 16 and 17 Bride Lane (Grade II);
- St Brides Foundation Institute and Library (Grade II);
- 2 Bridewell Place (Grade II);
- 13 New Bridge Street (Grade II);
- 15 New Bridge Street (Grade II); and
- Whitefriars Conservation Area.

### **Relevant Planning History**

8. On 2<sup>nd</sup> April 2015 planning permission was granted for 'Demolition of Fleet House and St Bride's Tavern Public House (retention of basement levels) and the erection of a replacement building consisting of 6972sq.m (GEA) of new office floor space along with two flexible (A1/A2/A3) retail units (total 326sq.m GEA) and one flexible retail/pub/office (A1/A2/A3/A4/B1) unit (391sq.m GEA) at ground floor and part basement level (Total 717sq.m)' (Application Reference: 14/00254/FULMAJ).
9. On 19<sup>th</sup> October 2021 a Certificate of Lawful Development was granted to demonstrate that the development was implemented within the appropriate time frame and is therefore considered to be lawful. (Applicated Reference: 21/00704/CLEUD)

### **Proposal**

10. Planning permission is sought for:  
Partial demolition of Fleet House and full demolition of St Bride's Tavern Public house (retention of basement levels) and the erection of a part replacement building with roof extension to provide an 8 storey building for office use (Class E) at levels 1-8, with office lobby (Class E) and commercial space (Class E) at ground floor and mezzanine level, and public house (sui generis) at ground floor level and part basement level; new pedestrian and servicing route from St Brides Lane to Bridewell Place.
11. The proposals seek to minimise demolition works. The public house building is to be demolished in line with the consented scheme. The façade will also be removed along with the demolition of the top floor 'penthouse' storey.
12. The proposed building following, refurbishment and extension, would be 7,701 sqm GIA comprised of:

- Office space (Use Class E) proposed from levels 1 to 8 (7212 sq.m);
  - Café space (Use Class E) proposed at mezzanine and ground floor (120 sq.m GIA); and
  - A Public House at ground floor and part basement level (369 sq.m GIA).
13. The development would include a new pedestrian, cycle and service route at the rear of the building, providing access from Bridewell Place to Bride Lane.

### **Consultation**

14. The Applicant has submitted a Statement of Community Involvement outlining their engagement with stakeholders. Prior to the application being submitted the applicant sent introduction letters on the proposal to neighbours and Ward Members on 13<sup>th</sup> May 2022.
15. The views of other City of London departments have been taken into account in the preparation of this redevelopment scheme and some detailed matters remain to be dealt with under conditions and the Section 106 agreement.
16. The application has been publicised on site and in the press, and consultation letters have been sent to surrounding residential occupiers. There have been two rounds of formal consultation as follows:
- a. Original application;
  - b. Amended application, which now proposes the provision of a public house (sui generis) and includes design changes to this area of the proposed building.
17. A total of 23 representations objecting to the application were received to the first round of consultations (Original application). No further representations were received to the second round of consultations (Amended application). The issues raised in the objections and the responses to these issues are summarised in the table below:

<b>Grounds of Objection</b>	<b>Officer's Response</b>
St Brides Tavern has historical, cultural, economic and social value and meets the criteria of policy HC7 of the London Plan. It is a busy, well used and well run pub.	This is addressed in the section titled 'St Brides Tavern'.
The private function room is very popular for private events.	This is addressed in the section titled 'St Brides Tavern'.
No need for additional office space as people are working from home.	This is addressed in the section titled 'Proposed Office Accommodation'.
St Brides Tavern is a rare example of a pub from this era.	This is addressed in the section titled 'Non-designated Heritage Assets'.
New buildings have a notorious environmental impact.	This is addressed in the section titled 'Sustainability'.
Concern about the impact of demolition/construction on the operation of St Bride Foundation including visibility of the St Bride Foundation to visitors, access, dust, noise/vibrations, vermin and structural damage	The majority of these issues would be covered by conditions 6, 7, 10 and 11. The concern regards structural damage is a matter between landowners and is not a planning consideration.

18. An objection was received to the first round of consultation from Martha Grekos CC, Common Councillor for Castle Baynard, as follows:

**Policy considerations**

*Policy HC7 (Protecting public houses) of the London Plan states that planning decisions should protect public houses where they have a heritage, economic, social or cultural value to local communities. The policy also then goes on to state that applications that propose the loss of public houses with heritage, cultural, economic or social value should be refused unless there is authoritative marketing evidence that demonstrates that there is no realistic prospect of the building being used as a pub in the foreseeable future.*

*In the supporting text to policy CV1 (Protection of Existing Visitor, Arts and Cultural Facilities) of the emerging City Plan 2036, it states that "There are many cultural facilities that are unique to the City and maintain an historic or cultural association with the Square Mile. Special consideration needs to be given to the protection of these facilities to maintain the City's unique cultural heritage. Examples of such facilities include City Livery Halls, public houses which have a heritage, cultural, economic or social value to local communities...". Policy CV1 states that the City Corporation will resist the loss of existing visitor, arts, heritage and cultural facilities, unless*

*replacement facilities of at least equivalent quality are provided on-site or within the vicinity which meet the needs of the City's communities.*

*The loss of the existing public house would also conflict with the City Local Plan policies CS12 and DM12.1 which seek to sustain and enhance heritage assets, their settings and significance. NPPF para 203 requires local authorities to take into account the impact of an application on the significance of a non-designated heritage asset. Para 203 further requires a local authority to make a balanced judgement in respect of the harm or loss of a non-designated heritage asset.*

#### *Facts/material considerations*

*St Bride's Tavern is a very busy community public house that has been in existence since 1794 - firstly as a pub called the White Bear which was then replaced and renamed in 1895 as St Bride's Tavern (NB historical record provided by the applicant is incorrect). It is a public house that is extremely loved and well-used by the local community - many call it the "village local", which has been run for 17 years by David and Karen Perkins. Despite being round the corner on Bridewell Place just off New Bridge Street, it has a very warm and welcoming frontage with flowers and outdoor sitting on the pavement and there are always people spilling into the street who are enjoying that social cohesion we have all missed of late due to the covid-19 pandemic.*

*The 'Public House Report' as submitted by the applicant as part of this application tries to undervalue St Bride's Tavern by stating that it has no or little heritage, economic or social or cultural value and also that the second part of the policy does not apply (ie that if it is of value and therefore directs refusal unless authoritative marketing evidence for 2 years is provided) by stating that there is no realistic prospect of the pub being reused in the foreseeable future.*

*This is incorrect. Not only does the pub have a historical significance given where it is: St Bride's Institute and Bridewell Theatre are just round the corner; St Bride's Church too. It is part of the fabric of that area and the connections it has to those buildings around it and as used by the press when Fleet Street was oozing with journalists when the newspaper industry was present. The pub is making a positive contribution to the local community. Not all pubs will attract tourists and have a huge historical past like the Ye Olde Cheshire Cheese, and so it is unfair for this report to compare it to such a pub when this pub focuses on the local workers and residents. In 1971, the authors of City of London Pubs said it was the type of comfortable pub which could become anyone's local. At the end of the day, different venues and pubs exist for different reasons and clientele. Economically, the pub is doing very well, socially it is the 'glue' for the locals and culturally it adds value because of this and caters for social*



*wellbeing and social interest, rather than just another chain coffee shop filling up the area. It sustains and enhances the area with its unique charm and character.*

*In addition, the Community Value Criteria has not been assessed correctly in the report. It states that there are no objections from anyone. A petition was started only two days ago and has received already over 500 objections. This is in addition to the objections received online. The report states that there is no evidence from local elected members to support this pub. The pub is in my local ward and I fully support its retention. It adds character and personality and warmth to this area and should be retained. The Statement of Community Involvement states that I was consulted but never have the applicant's team provided a physical or virtual presentation of this application to me as every other applicant for other applications has done since I have been elected in March 2022. The only way I found out about this application was via an online social media statement by the architects that this scheme was being submitted and I contacted the Planning Department to check if this was correct as it had not as yet been validated.*

*Castle Baynard Ward and surrounding area is multifaceted and as much as the commercial scheme is welcomed, the pub could be retained rather than be replaced by another contemporary coffee shop. The pub does not have a social media presence or website and there are not as many sports competitions / karaoke events and the like that take place there, but this is something that could easily be done by David and Karen Perkins once they know its future is secured. The pub does not actively pursue social media presence because it is a pub for the community. Lastly, yes it is closed on Saturdays and Sundays as are most shops and pubs in that area. As the local councillor for that ward, this is something I have been working with all retailers to change and to not just focus on weekdays. For example, I wrote to all retailers in June 2022 encouraging them to start opening on weekends and some are trying just Saturdays. A couple of the local pubs have only just started to do so because they have waited to see the footfall start to return and also to be able to have staff on weekends to assist. The Castle Baynard ward area is undergoing a huge amount of construction at the moment, so there are many issues why trading hours for many retailers are very different at present.*

*The report goes on to give examples of Grind, Notes or Beany Green being potential occupiers of the unit rather than a pub. Would such a class use provide the heritage, economic, social or cultural value to local community? The answer is 'no'. On the doorstep of the pub there is already chain and independent coffee shops - a Costa, Cafe Nero, Pret, Coco Mama, Established Coffee, Cord, Pickwick Coffee and also about to*

*open is Black Sheep. The area needs a variety of shops to serve everyone - many of my constituents keep telling me this - and to retain and celebrate its history rather than another chain coffee shop that is aimed to serve fundamentally the commercial office being proposed rather than the wider community.*

*To make it clear, the proposal to demolish St Bride's Tavern not only is contrary to part one of policy HC7 but also part two. Any reference to the 2014 application is now irrelevant as the world we live in is in a different place and policies have all moved on since then too.*

*The commercial scheme is welcomed but the demolition of St Bride's Tavern is not. I therefore urge you to (a) seek that the applicant reconsiders/redesigns the scheme so that St Bride's Tavern is retained in order for the commercial scheme to come forward; and (b) if the applicant continues with the application as is, i.e. that St Bride's Tavern is to be demolished, that the whole application is recommended for refusal.*

19. The following responses have been received from consultees:

Consultation Response	
TfL	<p><u>First Consultation:</u></p> <p>The site of the proposed development is on A201, New Bridge Street, which forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN and is therefore concerned about any proposal which may affect the performance and/or safety of the TLRN.</p> <p>The footway and carriageway on the A201 must not be blocked during the construction of the development. Temporary obstructions during the development must be kept to a minimum and should not encroach on the clear space needed to provide safe passage for pedestrians or obstruct the flow of traffic on the A201, New Bridge Street.</p> <p>All vehicles associated with the construction of the development must only park/ stop at permitted locations and within the time periods permitted by existing on-street restrictions. No skips or construction materials shall be kept on the footway or carriageway on the TLRN at any time. Should the applicant wish to install scaffolding or a hoarding on the footway whilst undertaking this work, separate</p>

licences may be required with TfL, please see, <https://www.tfl.gov.uk/info-for/urban-planning-and-construction/highway-licences>

The proposed development must comply with London Plan Policy D8, especially part D on sense of place at all times of day. Supporting text paragraph 3.8.10 is relevant to the public passageway connecting Bridewell Place and Bride Lane which should be well lit during darker hours to “ensure it is appropriate to address safety and security issues and make night-time activity areas and access routes welcoming and safe, while also minimising light pollution.” The passageway will also be used as a vehicular access. Servicing of the development via the new proposed passageway must not cause a barrier to safe movement or create severance for pedestrians and cyclists in order to comply with London Plan Policy D8 part D. Under policy T4 part F new development also must not increase road danger. We would strongly support restrictions on deliveries to avoid walking and cycling peaks. More information is also needed on if the passageway is proposed to be a 24-hour public route, which should be secured to ensure compliance with London Plan Policy D8 part H by maximising public access and minimising rules governing space.

The development proposal should comply with London Plan Policy T3 part B part 3 by safeguarding London’s walking and cycling networks, even during construction. Consent from the Council is required for the temporary pit lane on Bridewell Place. We should be consulted on discharge of the full Construction Logistics Plan (CLP) condition due to the close proximity of A201 New Bridge Street, which forms part of the TLRN. We are concerned about a cluster of recent highway collisions identified in the application materials, some serious, at the corner of New Bridge Street and Bridewell Place, where it is proposed for construction vehicles to turn in, park and use the proposed pit lane. The construction access arrangement and pit lane proposed should

	<p>therefore be subject to a Stage 1 Road Safety Audit (RSA) and Designer's Response prior to commencement of construction. This should follow TfL procedure (see <a href="https://content.tfl.gov.uk/tfl-road-safety-audit-procedure-may-2014-sqa-0170.pdf">https://content.tfl.gov.uk/tfl-road-safety-audit-procedure-may-2014-sqa-0170.pdf</a>). TfL will be happy to comment on the RSA.</p> <p>The development is largely compliant with London Plan minimum cycle parking requirements. However, 11% folding bike spaces are proposed, and London Plan paragraph 10.5.9 states "provision of space for folding bicycles is generally not an acceptable alternative". For offices, we generally only accept a maximum of 10% folding bike spaces. However on balance an extra 1% is deemed acceptable on this occasion.</p> <p>London Plan policy T6.5 on Non-residential disabled persons parking requires the development to provide access to at least one on or off-street disabled persons parking bay. The disabled parking bay outside the front of the development is limited to a maximum 3 hour stay. The Council may wish to amend this by Traffic Order.</p> <p><u>Second consultation:</u> No further comments received.</p>
Historic England	<p><u>First Consultation:</u> Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.</p> <p>We suggest that you seek the views of your specialist conservation and archaeological advisers.</p> <p><u>Second consultation:</u> On the basis of this information, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant.</p>

GLAAS	<p>The submitted Written Scheme of Investigation (WSI) conforms with the relevant standards and guidance. A condition is recommended requiring a timetable and scheme of archaeological evaluation.</p> <p><u>Second consultation:</u></p> <p>No further comments received.</p>
Thames Water	<p><u>First consultation:</u></p> <p>With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required.</p> <p>There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.</p> <p>Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.</p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for</p>

	<p>damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.”</p> <p>Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures.</p> <p>There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommends the following informative be attached to this planning permission. 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.</p>
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	<p><u>Second consultation:</u> No further comments received.</p>
Heathrow Airport	<p><u>First consultation:</u> We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.</p> <p><u>Second consultation:</u> No further comments.</p>
NATS	<p><u>First consultation:</u>  The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria.</p> <p><u>Second consultation:</u> No further comments.</p>
London City Airport	<p><u>First consultation:</u> No conflict with London City Airport's current safeguarding criteria.</p> <p><u>Second consultation:</u> No further comments received.</p>
CAMRA	<p><u>First consultation:</u> We wish to OBJECT to the above planning application to demolish St Bride's Tavern on 1 Bridewell Place within Castle Baynard Ward. We have no comment to make on the merits or otherwise of the overall scheme with regard to the redevelopment of the adjoining office block, but having consulted all the documents and plans very carefully, we are of the firm view that the demolition of St Bride's Tavern is unnecessary and does not need to form an integral part of the larger scheme.</p> <p>Although in its present guise as a late 1950s mixed used office and retail building, St Bride's Tavern actually continues a rich history of public house use</p>

	<p>on that site, dating back to at least the early 18th century. The Cogers debating society was formed within the pub in 1755 when it was known as The White Bear.</p> <p>The current building is remarkable inasmuch as it is a rare survivor of a purpose built post-war pub from an era when pub building in London was scant. St Bride's Tavern is a family-run, independent pub, in an area dominated by managed and chain houses. Pubs within the City are very special, serving more visitors, workers, guests and tourists than locals, but contributing inestimably to the character and charm of the ancient commercial heart of London. Whilst St Bride's Tavern might not be considered as architecturally significant as (say) Ye Olde Cheshire Cheese or The Black Friar, it adds to the rich spectrum of the City's pubscape and has built up a loyal following under the very careful stewardship of David and Karen.</p> <p>The loss of St Bride's Tavern is contrary to policy DM 22.2 of the adopted local plan. It is also inconsistent with London Plan policy HC7, which we helped to draft and then improve. The alternative provision proposed in the new scheme is simply not equivalent in any way to the present pub – its vibe, style and offer. An open plan mezzanine bar of a somewhat vague description is a totally different facility to that which would be lost, and is arguably not strictly a "pub" in the sui generis planning use class term. We would therefore attest that the proposal is fundamentally non compliant with London and City planning policy as it involves the unacceptable loss of a trading and viable public house, much loved by workers, visitors and residents alike.</p> <p>We align ourselves with the comments made by the CAAC and we too particularly recognise the recent partially restored frontage of the pub and its distinct nature and appearance. In the present building, the scale, massing and structure of St Bride's Tavern lends itself to be seen as neatly 'self contained' and</p>
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	<p>could be excluded from the present scheme, which would work acceptably in isolation, leaving the pub independent and intact, as a counterweight and contrast to its newly built neighbour of more contemporary appearance. This case is markedly different from the Still &amp; Star at Aldgate, where we reluctantly accepted that the existing pub, of an unremarkable and muddled condition, was effectively standing in the way of a much larger integrated development bringing a variety of commercial uses and new community social space. The planning benefit marginally outweighed the very sad loss of a freestanding Georgian pub. The St Bride's Tavern would not materially impact the proposals and can easily be left out of the development. We believe this would achieve the best of both worlds. On the strength of the application as it stands, we are unable to support.</p> <p><u>Second consultation:</u></p> <p>No further comments received.</p>
City of London Conservation Area Advisory Committee	<p>The Committee objected to the original proposals considering that the loss of the frontage of the public house and the lack of permeability guarantees would lead to a detrimental impact on the character and appearance of the Conservation Area</p>
Lead Local Flood Authority	<p><u>First consultation:</u></p> <p>The Lead Local Flood Authority has undertaken a review of the information provided in the above application and does not consider the proposed scheme to satisfy the requirements of the local planning policy in regard to flooding, the LLFA therefore recommends that the application be rejected. This is for the following reasons: - It has not been sufficiently shown that there are safe egress and access routes from the development. Given the level of surface water flooding identified within the vicinity of the development site it is expected that a fully considered flood emergency plan is provided for agreement</p> <p><u>Second consultation:</u></p>

	<p>The Lead Local Flood Authority has now reviewed the additionally supplied '5060 Flood Emergency Plan – August 2022'. This has fully addressed the concerns raised within our previous memo (15th August). The Lead Local Flood Authority therefore withdraws its previous recommendation to reject the application. The Lead Local Flood Authority recommends that the Local Planning Authority agrees the proposed Flood Evacuation Plan.</p> <p>Conditions recommended relating to SuDs.</p>
Environmental Health	<p><u>First consultation:</u> Conditions are recommended regarding demolition and construction logistics, demolition and construction environmental management, Plant Noise, Fume Extract, Roof terrace hours, and the prohibition of playing of music.</p> <p><u>Second consultation:</u> No further comments received.</p>
District Surveyors	<p><u>First consultation:</u> The roof terrace should have access to two means of escape stairs if it is for any use other than periodic maintenance.</p> <p><u>Second consultation:</u> The District Surveyors Office has reviewed the Fire Strategy Addendum. In respect of the Mayor's policies D5 and D12, I consider the application complies with the policies</p>
Air Quality Officer	<p><u>First consultation:</u> Air Quality assessment: The proposed development will employ air source heat pumps with solar PV panels so there will be no on-site emissions associated with heating and hot water provision. The additional traffic movements are considered to be below the screening criteria for dispersion modelling. Therefore, modelling of any impacts is not considered necessary.</p> <p>Air Quality Neutral Assessment: Both the transport and building emissions are considered to be air quality neutral. The methodology used for the air quality neutral assessment is based on the 2014 Air Quality Neutral Planning Support document. However draft</p>

	<p>consultation guidance to support the London Plan 2021 is available and should be used for the assessment.</p> <p>While the new guidance is unlikely to change the conclusions of the assessment for the transport emissions, the inclusion of the generator emissions (depending on the number of generators and hours of operation for testing) may impact on the building emissions calculations. Therefore, a revised assessment that includes the generator emissions may be required.</p> <p>Generators:</p> <p>The report states that the proposed development will include generators for back-up purposes, but no details are provided. The generators may need to be included in the AQ neutral assessment for building emissions (see above). The location and flue position of the generators are not provided in the application documents, however the exhaust outlets must be taken into account as any flues must terminate a minimum of one metre above the height of the building and away from the terraces, roof gardens and fresh air intakes.</p> <p><u>Second consultation:</u></p> <p>The energy strategy for the proposed development has been confirmed and will use zero emission technologies in the form of Air Source Heat Pumps (ASHPs) and solar PV panels. A single generator used for back-up purposes only is also proposed.</p> <p>Air Quality assessment:</p> <p>A revised AQ assessment (Rev 04, September 2022) has been submitted. The proposed development will employ ASHP with solar PV panels so there will be no on-site emissions associated with heating and hot water provision. The additional traffic movements are considered to be below the screening criteria for dispersion modelling. Therefore, modelling of any impacts is not considered necessary.</p> <p>Air Quality Neutral Assessment:</p> <p>Both the transport and building emissions are considered to be air quality neutral.</p>
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	Conditions are recommended.
Environmental Resilience Officer	<p><u>First consultation:</u> The proposed development is generally acceptable in climate change resilience and adaptation terms. However, further information on climate resilience such as the full assessment report prepared under BREEAM Wst 05 credit is required. If this is not available, then a condition is recommended requiring the submission of a Climate Change Resilience Sustainability Statement.</p> <p><u>Second consultation:</u> No further comments received.</p>

### **Policy Context**

20. 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.
21. 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
22. 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.
23. There is relevant GLA supplementary planning guidance and other policy in respect of: Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014), Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014), Sustainable Design and Construction (GLA, September 2014), Social Infrastructure GLA May 2015) Culture and Night-Time Economy SPG (GLA, November 2017), London Environment Strategy (GLA, May 2018), London View Management Framework SPG (GLA, March 2012), Cultural Strategy (GLA, 2018); Mayoral CIL 2 Charging Schedule (April 2019), Central

Activities Zone (GLA March 2016), Shaping Neighbourhoods: Character and Context (GLA June 2014); London Planning Statement SPG (May 2014); Town Centres SPG (July 2014); Mayor's Transport Strategy (2018) and the Culture 2016 strategy.

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

### **Considerations**

25. 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).
26. 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);
27. With respect to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. S72 (1) Planning (Listed Buildings and Conservation Areas) Act 1990);
28. 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".

29. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
30. 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
    - 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.
31. 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)
32. 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.
33. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.
34. 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.

35. Paragraph 93 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.
36. 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”.
37. 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.
38. 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”.
39. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 126 advises that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”
40. 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.

41. 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...'
42. 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.
43. 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.
44. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment.
45. 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.
46. 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.”
47. 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.
48. 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.
49. 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”.
50. 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”.
51. Paragraph 206 of the NPPF states “Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

#### **Considerations in this case**

52. 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. Comments of statutory consultees should be given great weight.

53. The principal issues in considering this application are:
- The extent to which the proposals comply with the Development Plan.
  - The extent to which the proposals comply with the NPPF
  - Economic issues
  - The appropriateness of the proposed uses
  - The impact and quality of the architecture and urban design
  - The impact of the proposals on strategic views
  - The impact on the significance of Designated Heritage Assets by way of the contribution made by their settings
  - The impact of the proposals on non-designated heritage assets
  - The impact of the proposal on any archaeology beneath the site.
  - The quality and value of the cultural contribution
  - The accessibility and inclusivity of the development.
  - Transport, servicing, cycle parking provision and impact on highways
  - The impact of the proposal in terms of energy and sustainability.
  - The impact of the proposed development on the amenity of nearby residential occupiers, including noise, overlooking, daylight, sunlight and light pollution.
  - The environmental impacts of the proposal including wind microclimate, flood risk, and air quality.
  - The 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 Issues**

54. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
55. 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.

56. 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.
57. 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.
58. 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.
59. 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.
60. 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.

61. 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.
62. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
63. 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.
64. 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.
65. 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.

66. 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 the emerging City Plan. The proposed development would result in an additional 2211 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.

#### **Proposed Office Accommodation**

67. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Policy S4 of the draft City Plan 2036 seeks to ensure that new office floorspace is designed to be flexible to allow adaptation of space for different types and sizes of occupiers and to meet the needs of SME's, start-up companies and those requiring move on accommodation.
68. The application site currently provides 5001 sq.m GIA of office floorspace. The proposed development would provide 7212 sq.m GIA of office (Class E) floorspace on the site. This equates to a total uplift in office floorspace across the site of 2211sq.m GIA.
69. 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.
70. The Proposed Development does not include the delivery of affordable workspace, but the design and size of the floorplates in the proposed building are inherently suitable for SMEs without any sub-division.
71. The office floorspace is considered to be well designed, flexible office accommodation in a well-considered and sustainable building, further consolidating the nationally significant cluster of economic activity in the City and contributing to its attractiveness as a world leading international

financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ and supports the aims of Local Plan policy CS1 and draft City Plan 2036 policy S4.

72. The proposed office accommodation supports the aims of Local Plan policy CS1 and the Proposed Submission Draft City Plan 2036 policy S4 and would provide flexible office floorplates for workers which are designed to meet the needs of a wide range of potential occupiers, in accordance with Policy DM1.3 in the adopted Local Plan and Policy OF1 in the Proposed Submission Draft City Plan 2036.

### **Retail Uses**

73. Policy CS20 of Local Plan 2015 seeks to improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them. The site falls within a Principal Shopping Centre as identified in the Local Plan. Policy DM 20.1 seeks to encourage the provision and resist the loss of retail frontage and floorspace within Principal Shopping Centres.
74. Likewise Strategic Policy S5 of the Draft City Plan 2036 seeks to improve the quantity and quality of retailing and the retail environment, focusing new retail development in Principal Shopping Centres and encouraging movement between them by enhancing the retail environment along Retail Links. Policy RE1 states that within the Principal Shopping Centres, “the loss of ground floor retail frontages and/or floorspace will be resisted and additional retail provision of varied unit sizes and frontage lengths will be encouraged, supported by complimentary uses that increase footfall and provide active frontages.”
75. The application would result in a loss of 428 sqm of retail floorspace comprising of a betting shop and restaurant, and the creation of 120sqm of retail floorspace to provide a café. While this represents a loss of 308 sqm of retail floorspace, all of the existing retail floorspace could be converted to office use under the new Class E since it is not subject to any restrictive conditions. In addition, the betting shop use does not currently provide an active retail frontage, whilst the re-provided pub would increase the active frontage of that unit from 8.5m to 32.5m. Accordingly, the proposal is considered acceptable in land use terms.

### **St Brides Tavern**

76. Policy HC7 (Protecting public houses) of the London Plan states that planning decisions should protect public houses where they have a heritage, economic, social or cultural value to local communities. It further states that proposals for new public houses should be supported where

they would stimulate mixed use development, accounting for potential negative impacts.

77. In the supporting text to policy CV1 (Protection of Existing Visitor, Arts and Cultural Facilities) of the emerging City Plan 2036, it states that “There are many cultural facilities that are unique to the City and maintain an historic or cultural association with the Square Mile. Special consideration needs to be given to the protection of these facilities to maintain the City’s unique cultural heritage. Examples of such facilities include City Livery Halls, public houses which have a heritage, cultural, economic or social value to local communities...”. Policy CV1 states that the City Corporation will resist the loss of existing visitor, arts, heritage and cultural facilities, unless replacement facilities of at least equivalent quality are provided on-site or within the vicinity which meet the needs of the City’s communities.
78. The text further states that the City Corporation has published guidelines for determining nominations for Assets of Community Value in the City of London, which include local criteria to assess the role of public houses in furthering social wellbeing or social interest.
79. Part 5 Chapter 3 of the Localism Act 2011 introduced provisions for the designation of certain buildings or land as Assets of Community Value (ACV). Detailed regulations, the Assets of Community Value (England) Regulations, were published in 2012 and non-statutory guidance issued by the Government in the same year.
80. A building should be considered an asset of community value if:
  - Its actual current use furthers the social wellbeing and interests of the local community, or a use in the recent past has done so; and
  - that use is not an ancillary one; and
  - for land in current community use it is realistic to think that there will continue to be a use which furthers social wellbeing and interests; and
  - it does not fall within one of the exemptions in the regulations e.g. residential premises.
81. Such a designation places statutory limitations on a landowner’s ability to sell the building or land, with a 6 month moratorium period during which the landowner cannot agree a sale, to enable the local community to put together a bid to purchase although there is no requirement on the landowner to sell to the local community at the end of the moratorium period.

82. A nomination was received by the City Corporation to designate St Brides Tavern as an Asset of Community Value (ACV), and this was reported to Policy and Resources Committee on 15th December 2022 with a recommendation that St Brides Tavern should be designated as an ACV. This recommendation was not upheld by Policy and Resources Committee.
83. Nevertheless, it is considered that St Brides Tavern does have social value as a public house and this is demonstrated by the representations made objecting to the planning application, which argue that the pub is valued by workers and tourists and has a well used function room. Policy HC7 of the London Plan is therefore engaged.
84. In this instance it is considered that the provision of a new public house would result in a new social, community and cultural facility on the site offering a comparable facility to the existing public house, alongside office development. The Sui Generis Public House use would be reprovided. The proposals would, therefore, accord with policy HC7 of the London Plan and policy CV1 of the emerging City Plan 2036.

### **Transport and Highways**

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

85. 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 3 minute walk of Blackfriars Underground and City Thames Link services as well as being within a 10 minute walk of St Paul's London underground services. Accordingly, the site is considered suitable in principle for the proposed type and scale of development proposed.

#### **Cycle parking**

86. London Plan Policy T5 (Cycling) requires cycle parking be provided at least in accordance with the minimum requirements set out within the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.
87. The level of long stay cycle parking proposed as part of the development is compliant with the London Plan requirement, shown in the table below. It is welcome that the proposals include cycle parking to meet the requirements of the entire site and not just the uplift in floorspace. The level of short-stay cycle parking exceeds the requirements of the London Plan standards in relation to the proposed uplift in floorspace and when



taking account of the constraints of the site and limited opportunities to provide external spaces, this is considered acceptable.

London Plan long stay cycle parking requirements	Proposed long stay cycle parking	London Plan short stay cycle parking requirements	Proposed short stay cycle parking
112	112	30	16

88. The long stay cycle parking is proposed at basement level with access available via a cycle lift from a new cycle entrance from the newly proposed Bridwell Passage. All spaces would be easily accessible and the lift is 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.
89. Five percent of the spaces (i.e. 6 spaces) will be able to accommodate adapted cycles in accordance with the London Plan Policy T5 (Cycling), London Cycling Design Standards 8.2.1, and the draft City Plan 2036 6.3.24).
90. The proposals include showers, and lockers, in line with London Plan Policy 10.5.7 requirements which seek a minimum of 2 lockers per 3 long-stay spaces, and at least 1 shower per 10 long-stay spaces.
91. Eleven short-stay spaces for the office use will be located within the site across ground floor level and B1 basement level, accessible using the Cycle lift. Given the constraints of the site this is considered acceptable and a management strategy for these spaces will be secured within the cycling promotion plan to prevent unauthorised entry into the cycle storage areas whilst ensuring that the spaces are clearly signposted and easily accessible. Two new Sheffield stands (four spaces) will be provided at ground floor level on TFL highway.
92. The applicant will be responsible for promoting the use of the cycle parking spaces and as such will be required by Section 106 obligation to produce a Cycling Promotion Plan, which is a cycling focused Travel Plan. It will be submitted to the City for approval in line with the London Plan Policy T4.

### **Servicing and deliveries**

93. 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 only used where this is not possible.

94. As existing, the site has an off-street servicing area accessed via a pavement crossover from Bridewell Place. This allows for servicing activity to take place off-street however requires the use of a turntable in order for vehicles to turn within the site in order to access/egress in a forwards gear. The Transport Statement also notes that some servicing activity for the retail units takes place from the loading bay on New Bridge Street adjacent to the site. The site is not currently subject to any restrictions on how or when servicing activity is undertaken.
95. The proposal seeks to introduce a revised servicing arrangement with all servicing activity taking place on the newly proposed through route along the western edge of the site between Bridewell Place and Bride Lane, indicatively identified as Bridewell Passage. This would represent a significant improvement to the existing arrangement, allowing vehicles to move through the site, access the site from Bride Lane and egressing in a forwards gear onto New Bridge Street without the need for vehicles to undertake reversing manoeuvres either within the site or on the local highway. Larger vehicles greater than 7.5 tonnes would continue to service the site from the dedicated loading bays on New Bridge Street, in accordance with the existing permitted loading times.
96. The applicant has included a commitment to the use of off-site consolidation of deliveries. It is considered a reasonable assumption that the use of off-site consolidation can reduce the number of deliveries to a site by 50% and, applying this figure to the expected level of trips for the proposed development, there would be a maximum of 12 deliveries per day for the entire site. In its current operation the site has a daily requirement for 24 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 of deliveries per day to a maximum of 12 would be required within the S106 agreement.
97. The draft City Plan 2036 Policy VT2 requires delivery to and servicing of new developments to take place outside peak hours (0700-1000, 1200-1400, and 1600-1900 on weekdays) and requires justification where deliveries within peak hours are considered necessary. The applicant has agreed to overnight servicing of the site restricted to between 7pm and 7am. Limited exemptions for the delivery of perishable goods outside of these hours will be permitted, with a number to be agreed within the Delivery and Servicing Plan. No servicing will be permitted at peak

pedestrian times 0700-1000, 1200-1400, and 1600-1900, in line with the City of London Transport Strategy. Cargo bikes would be permitted to service the site without restriction.

98. A servicing management regime for the new through route would be secured within the S106 outlining how the proposed vehicular access gates would be managed in order to prevent conflict between servicing activity and other users of this route. The passageway would be fully open and permeable for pedestrians and cyclists between the hours of 7am and 12pm except when deliveries are taking place and this would be secured through the S106. 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 there are no objections to the proposed arrangement.

### **Waste Storage and Collection**

99. The waste storage area would be located at ground floor level with access directly onto Bridewell Passage. Waste would be collected from Bridewell Passage. The Cleansing Team are satisfied with this arrangement.

### **Car parking**

100. 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. In cases where no provision for general parking is provided, London Plan Policy T6.5 requires the provision of at least one on or off-street disabled persons parking bay.
101. The site currently has no off-street parking provision, and the application does not introduce any new opportunities for this which is appropriate. Given the constraints of the site and the context of the surrounding streets with no suitable opportunities to provide additional spaces at kerbside, the lack of provision for a blue badge bay is not considered objectionable, despite falling short of London Plan requirements.

### **Trip Generation**

102. 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 peak AM hour (8:00-(9:00) would be 282 and during the Peak PM hour (5pm-6pm) would be 238 with the vast majority of trips being undertaken by sustainable modes. This represent an increase of 79 and 67 trips respectively during the peak hours.

103. 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 movement, or any undue implication on Public Transport capacity. The proposed route to the western side of the site would further aid permeability and movement around the site.

### **Stopping Up/Oversailing**

104. As the highway authority for Bridwell Place and Bride Lane, we have a duty, set out under section 130 of the Highways Act 1980, to “assert and protect the rights of the public to the use and enjoyment of any highway for which they are the highway authority, including any roadside waste that forms part of it, and to prevent, as far as possible, the stopping up or obstruction of the highways”.
105. The proposals include some minor areas of stopping up of highway for which the city is the Highway Authority on Bridwell Place and New Bridge Street with a total area of 5.67 sqm. An additional 1.77sqm of stopping up is proposed on New Bridge Street on TFL highway, to which TFL has not raised any objections. The loss of these small parcels of Highway is not considered to be prejudicial to pedestrian movement, access or safety around the site.
106. Additional areas of Public Highway are to be dedicated on the New Bridge Street frontage of the site totalling 12.05sqm and this results in an overall net gain in Public Highway of 4.77sqm.
107. The proposed route, Bridwell Passage, would provide c.125sqm of new public realm which would represent a welcome improvement for pedestrian and cyclists permeability around the site outside of permitted servicing times.
108. It is proposed to include elements of oversailing on the building on Bridwell Place and Bride Lane. The oversailing would not impact the current access to the street, as the oversailing is proposed at a minimum height of 5.7m, which meets the minimum oversailing requirements. Technical approval would be required for oversailing of the highway.
109. It is also proposed for there to be minor oversailing of New Bridge Street for which TFL is the Highway Authority. The oversailing meets the City standards for oversailing, and the oversailing over these two streets is considered acceptable. These oversails would also require technical approval and licences from the relevant highway authority (the City or TfL).

### **Construction Logistics Plan**

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

### **Transportation Conclusion**

111. Subject to conditions and planning obligations, the proposal would accord with transportation policies including London Plan policies T5 cycle parking, T6 car parking. It accords with the Local Plan 2015 Policy DM3.2, DM16.5 and the draft City Plan 2036 Policies AT1, AT2, AT3, and VT3 and the proposals are considered acceptable.
112. Overall, the proposal is considered acceptable in transport terms and would deliver public realm improvements and reduce the number of vehicular and servicing trips to and from the site. Whilst the proposed stopping up is undesirable in transport terms, it is considered to be offset by the wider development and associated benefits.

### **Design**

113. The proposed development would create a sustainable mixed-use building, primarily containing office space, with the re-provision of a public house, and provision of café space at ground floor level, representing an increase in the level of office provision and appropriate supporting uses within the Central Activity Zone (CAZ). The proposals include the refurbishment of the existing building, part retention of the existing building structure, replacement of the facades and the insertion of 2 additional storeys. A new, predominantly pedestrian route with restricted vehicle access would be provided. Additional amenity space for the office occupiers would be provided through the provision of a privately accessible terraces on the upper levels of the building.
114. 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 would improve the existing site condition and would optimise the delivery of the site through a design-led approach. The proposals make an effective use of limited land resource and enhance the buildings relationship with the adjacent public realm and townscape. The proposals are in conformity with Local Plan Policies CS10 (Design) and DM10.1 (New Development), London Plan Policies D3/D8 and emerging City Plan 2036 Strategic Policy S8 (Design).
115. The proposals would deliver a diverse mix of complementary uses to support the dynamic and vibrant wider neighbourhood, both during the

day and at night, in accordance City's broader visions to deliver outstanding places, as part of 'Destination City', 'City Recharged' (2020), 'Future City' (2021) and 'Culture and Commerce' (2021). The proposals are also in the emerging City Plan 2036 Key Area of Change (KAOC), the proposals would correspond with the objectives for the area, by delivering an appropriate redevelopment which protects the character and appearance of the processional route, providing additional office space within the area, delivering retail provision, a new public house and enhancing the public realm.

116. 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. It would promote a high standard of design and sustainable buildings, streets and spaces, which are contextual and appropriate to character and surrounding amenities, making an effective use of limited land resource, in accordance with London Plan Strategic Policy S8 (Design).

#### Architecture and Urban Design:

##### Height, form and massing:

117. The proposed massing has been shaped by the intent to retain part of the building's structure and to protect strategic views. The proposed massing would increase the floor space provided on site by sensitively expanding the envelope of the building, concentrating most of the built form towards the east elevation in a similar manner to the existing building, upon the retained eastern half of the existing structure. The centre of the site would accommodate most of the additional floorspace, where the footprint of the building would expand on the middle to upper storeys. This expansion would be chamfered to protect views of the St Bride's church spire from the southeast. The massing has been distributed to respond to the street hierarchy, the tallest parts of the building are positioned on the principal thoroughfare of New Bridge Street and the massing steps down on secondary streets towards Bride Lane and Bridewell Place.
118. The roof extension would be set back from the edge of the main body, with a different architectural treatment to the lower level façades. When viewed from the north on Ludgate Circus and to the south on New Bridge Street, the additional mass would be apparent, however, the height increase would generally appear comfortable, with an attractively modelled roofscape adding interest at a high level to the street scene.

119. The proposed height increase would result in the top of the building peeking above the ridge line of neighbouring buildings, not dissimilar to the existing building. Building heights in the area are generally not uniform, there is a subtle variation in building heights in the wider neighbourhood to the west, south and east. As a result, the proposed height and massing appears comfortable and is considered to be in accordance with City of London Local Plan Policies CS10 (Design) and London Plan Strategic Policy S8 (Design).
120. The implemented 2014 consent (14/00254/FULMAJ) proposed a curved building line which responded to the irregular geometry of New Bridge Street. The current proposals have a straight façade line which predominantly aligns with buildings to the north, but is straight as opposed to curved a result of the structural retention. The proposed façade line would sit within the previously consented footprint, resulting in a building mass which does not protrude out as far into the street. In views from the south, the façade line would sit sympathetically with 13-19 New Bridge Street, with fenestration on the corner articulating the façade and improving the backdrop to the listed buildings. In views from the north from Ludgate Circus, the building would appear to extend to a similar extent to the existing building. The chamfer on the northeast corner would reduce the prominence of the building against - and create a positive relationship with - 7 New Bridge Street.

External appearance:

121. The existing 1950s building does not meet modern design standards. The floor to ceiling heights are low, the energy performance is poor and the ground floor is defensive. The proposals would rectify these issues, and the alterations to the façades would enhance the appearance of the building.
122. The new facades on the middle of the building would have light concrete columns and lintels with faceted, pigmented masonry panels, arranged in a rectilinear and geometric grid. The colour of the panels has been developed in response to neighbouring buildings and would integrate it with its context: red tones would be used towards the west, adjacent to the Bridewell Institute, and lighter tones would be used along New Bridge Street where buildings are typically light coloured masonry.
123. The east elevation would have large square windows, which would help emphasise the horizontality of the facade, with greening and recesses to give depth and articulation. The relationship between the massing and arrangement of the façade is considered to be positive, as the façade

composition works with the scale of the building. This results in a façade which would improve the character and appearance of New Bridge Street

124. The upper floors of the building would be finished in a light coloured concrete. The top is considered to be sensitively modelled to create visual interest at a high level, whilst appearing secondary and recessive to the lower elevations, reducing the dominance of the additional building mass on the street scene, the design and materiality of the upper facades are considered to be appropriate, and work well with a stepped top to the building. The proposed architecture would enhance the appearance of the existing building and contribute positively to the streetscape and local townscape views, in addition, the proposed elevations are considered to be attractive, robust and high quality.
125. The proposals would seek to deliver amenity in the form of terraces to the upper office levels. Local Plan Policy DM10.3 (Roof gardens and terraces) encourages the installation of high-quality roof gardens and terraces. Emerging London Plan and Local Plan Policies G5 (Urban Greening) and OS2 (City Greening) require compliance with the Urban Greening Factor (UGF), in both instances for such a development, of a minimum score of 0.3 for commercial development. The policies require major development to contribute to urban greening as a fundamental element of building design. Local Plan policy DM10.3 encourages high quality roof gardens and terraces where they would not adversely affect roof profiles, roof forms or impact on identified views.
126. The existing building does not benefit from any external amenity provision. A large privately accessible roof terraces is proposed at level 9. The roof terraces would be set back from the façade, behind a parapet and planters, visibility of balustrades would be limited from streets adjacent to the site. This setback would limit how close the building occupants could stand to the edge of the building to mitigate the potential overlooking impact on adjacent residential properties. Additional, smaller terraces, at level 4, 7, 8 and 9 would also have planting on the periphery of the terrace to help mitigate potential overlooking impacts, whilst creating an attractive view of the terraces from street level.
127. At roof level, the plant equipment would have an enclosure, which would have limited visibility at ground level. Intensive landscaping would feature on the upper level roofs, providing habitats for insects and birds and enabling biodiversity gains. The roofscape is considered to be well detailed and attractively modelled, to create a high quality roofscape. The roof terrace design is considered to be compliant with Local Plan policies, CS10, policy DM10.2 and DM10.3. Conditions to control the hours of use



of the roof terrace and preventing amplified or other music would be imposed on this application to safeguard the amenity of the adjoining premises, in accordance with policies DM15.7 and DM21.3 of the City's Local Plan 2015.

128. M&E plant and building services would be accommodated in the existing basement and on the roof of the building. A proportion of plant and services are integrated in the basement, relieving pressure on the top of the building to accommodate additional plant space. The rooftop plant enclosure would have some visibility in local townscape views, where it would be seen in the context of a varied roofscape. The rooftop plant would be screened from view in accordance with Local Plan Policy DM10.1 and DM 10.3.

The proposed public house:

129. There is an existing pub on site, the St Bride's Tavern, which would be re-provided as part of the proposals. The existing pub is proposed to be demolished, partly due to the technical challenges created by retaining it in its current location. Without the creation of the new route, the building would be unserviceable by larger vehicles off street; if the existing service bay were to be maintained, large service vehicles would have to reverse out over the pavement. In addition, the retention of the existing pub underneath a re-development above would not be feasible due to structural and technical constraints. It is considered that re-provision is the best solution to maintain the existing use on site.
130. A key difference between existing and proposed is the re-orientation and the re-distribution of the pub floor space horizontally, as opposed to vertically. The existing pub is split over 3 levels and a considerable amount of space is used internally as staircases, reducing the amount of internal lettable area within the overall envelope. Furthermore, the existing floor level and entrance is above street level, resulting in no level access. This re-orientation of floor space would also create more prominent and active frontage on New Bridge Street, along a route with a high level of pedestrian footfall. The pub would have two entrances, one facing New Bridge Street, conveniently located next to the existing pedestrian crossing, and one entrance on Bridewell Passage, the new pedestrian route. Having 3 elevations facing on to different surrounding streets, the pub would help to support the activation and vibrancy of the wider public realm. Legibility and visibility of the unit to pedestrians would be enhanced through the provision of prominent signage, details of which are reserved for condition.

131. The approach is to replace the postwar tavern with a contemporary pub which interprets the historic characteristics of pub façade design in a sensitive and subtle way. The proposed design takes cues from historic pubs in the surrounding area to create a convincing appearance, without mimicking them directly.
132. The proposed façade would be attractive and it would be clearly identifiable as a pub. It would display interesting design quirks which positively contribute to its character and appearance, chiefly the proposed brickwork patterning which would shift in contrast as the observer moves around the building, from a predominantly darker pattern to the west and a lighter pattern to the east. This effect would be supported by the coloration of the window reveals, which add further depth and interest to the façade. The design has been developed through research into the external appearance of historic pubs within the area, the composition of columns, fascia's and the design of fenestration, as well as a considered focus on smaller scale details, all contribute to a high quality design. Further interest would be created through the provision of planters above eye level which help to maintain the intrinsic 'pub persona' of the existing pub. The detailed design of each element of the elevations would be reserved for condition, however, the materials proposed are considered to be attractive, robust and high quality.
133. The architects have successfully embraced the challenge of seamlessly stitching together the pub façade with the contemporary elevations of the office accommodation above. The design and appearance of the proposed pub is considered to be satisfactory and it would make a positive contribution to its surroundings.

#### Urban Design:

134. Emerging Strategic Policy S8 (1/2) seeks to optimise pedestrian movement by maximising permeability, providing external and internal pedestrian routes which are pedestrian-focused, promote active travel, and create a safe, welcoming, attractive, convenient, comfortable and inclusive public realm. This is substantiated by emerging London Plan Policies D1, D4, D8 and G4, emerging City Plan 2036 Policies, D3, D4, S14 and OS1 and adopted Local Plan Policies CS16, DM16.2, CS19 and DM19.1, which seek to increase the quantity, quality and accessibility of public open space.
135. The proposed ground floor design, with a much more active and open façade, and refreshed elevations on the middle of the building would enhance the appearance of the building and make a positive contribution to the surrounding streets. The proposals would allow the building to have

a better relationship with its surrounding context, particularly at ground floor level, where an improved dispersion of uses, entrances and window openings would encourage activity in the surrounding area throughout different times of day and on different days of the week.

136. At the base of the building, the office lobby, the café space and the pedestrian route would be finished in a light concrete for the columns and lintels, glazed brick and anodized metalwork for doors and windows. The ground floor uses include retail space and an office lobby, in addition to the pub, with large scale double height window openings which would improve visual permeability with the street, ultimately contributing to the vibrancy and interest of the street scene. The arrangement of the ground floor uses would be slightly altered, with the office lobby increasing in size and moving to the centre of the east elevation, with café space being provided on the northeast corner. The proposed ground floor design and appearance would be an improvement on what is existing. Each use been carefully positioned in a visibly prominent location, the improved design and appearance would improve the buildings interaction with the street. Level access to the pub would be provided on the southwest corner and a ramp would provide access to the office lobby and café space. In addition, the increase in the number of entrances, with appropriate signage and fascia's would provide an accessible, legible, and permeable building. The proposal would deliver a positive relationship between the building and the public realm in accordance with London Plan Policy D3 and D8 and Local Plan Policies CS 10 and DM 10.1.
137. At the lower levels, the application seeks to improve the way people access the building and move around it, with improvements to the frontages to New Bridge Street, Bridewell Place, Bride Lane and along a newly created route, Bridewell Passage. The proposals would further enhance active travel through the provision of the new pedestrian route, the design of the building and surrounding public realm. Secured through s.278, the applicant would provide refreshed surface treatments on the pavements on New Bridge Street, Bride Lane and Bridewell Place. The cycle parking is accessed from Bridewell Passage, where out of hours servicing would reduce conflict between pedestrians, cyclists and vehicles, to enhance ease of movement. There are also gates at either end of the route, which would be closed during service hours in order ensure safety. Furthermore, prominent and visible signage for the cycle store would aid wayfinding for active travellers.
138. The repaving would be delivered in line with the City's palette of materials, to create a coordinated look and feel for the streets which connect two Conservation Areas, the Whitefriars Conservation Area and the Fleet Street Conservation Area. Further interest would be added on Bridewell

Passage, with the provision of artboards, which could be used for cultural artwork or advertising the Bridewell Theatre. Also, lighting along Bridewell Passage would be provided to create a safe and well lit route, details for the lighting and artwork are reserved through condition, and the details would be agreed through the relevant strategies.

139. Irrespective of the approved drawings, 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 are useable.
140. Appropriate lighting, in accordance with Local Plan Policy DM 10.1, would deliver a sensitive and co-ordinated lighting strategy integrated into the overall design, minimising light pollution, respecting the historic context and enhancing the unique character of the City by night. Irrespective of the approved drawings, 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. The proposed public realm lighting strategy, would provide low level illumination to architectural and landscape features, to enhance the pedestrian experience and improve safety.
141. Overall, the proposal would optimise the use of land, delivering high quality office space and retail space, 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.

#### Strategic Views:

142. Policy CS13 of Local Plan 2015 seeks to protect and enhance significant City and London views of important buildings, townscape and skylines. It seeks to implement the Mayor's London Plan Policy HC4 and the LVMF SPG, views of historic City landmarks and securing an appropriate setting and backdrop to St Paul's Cathedral and the Tower of London. S13 of the City Plan 2036 carries forward similar policy objectives to protect and enhance significant views.

143. The application site sits outside any LVMF protected viewing corridors, including the London Panorama, Linear and Townscape Views as identified in the LVMF, the proposed scheme would however be visible in some River Prospect Views.

View 11 (11A.1), River Prospect, London Bridge (upstream):

144. St Paul's Cathedral is the sole Strategically Important Landmark, while other landmarks include the Cannon Street Station towers, the Old Bailey and St Bride's Church. The visual management guidance identifies the skyline presence of St Paul's and the positive visual interaction it has with the 'Wren-esque' Cannon Street Station (para 191), which the proposal would not dilute, in accordance with paragraph 193-4. The proposal, situated at a significant distance to the west of the Cathedral, of an appropriate height, would not visually dominant the Cathedral in accordance with paragraphs 194 and 197.
145. The proposal would not be visible against St Bride's Church, a contributing landmark in the composition. The proposed building would sit behind existing built roofscape, which is in the foreground of the view and the proposed building would not be visible.
146. Overall, the proposal would not harm the characteristics and composition of the strategic view and its landmark elements, including preserving the ability to recognise and appreciate St Paul's as the SIL.

Millennium Bridge and Thames Side at Tate Modern (13A.1 and 13B.1):

147. St Paul's Cathedral is the sole SIL, while wider landmarks and contributing features are Millennium Bridge and several Wren Church towers and spires which contribute greatly to the wider setting of St Paul's.
148. The visual management guidance identifies the dominance of the bridge and St Paul's, whereby the St Paul's Heights has preserved an appreciation of the Cathedral above cornice line, whilst some tall buildings, including the Barbican Towers, compromise that backdrop (paragraph 225).
149. The building would be masked by Millenium Bridge in view 13 A.1 and 13B.1, it would also be substantially offset from the Cathedral. The proposal would not harm the characteristics and composition of the strategic view and its landmark elements.

### St Paul's Heights:

150. The Protected Views SPD (2012) paragraph 2.13 states that 'development proposals within the Heights policy area must comply with the Heights limitations'. The City of London Local Plan Policy CS13.2 states that views of St Paul's Cathedral should be protected through the St Paul's Heights code, including its setting and backdrop.
151. The St Paul's Heights grid has one grid square which covers part of the site on the southeast corner, with a spot height of 37.1m. The parapet and planter of the level 8 terrace would go up to 37.1m and would therefore not breach the grid.
152. The proposals would be compliant with policy CS13.2, as the St Paul's heights grid would be adhered to and views of St Paul's Cathedral would be protected.

### Other Views:

#### St Paul's Cathedral, Golden Gallery and Stone Gallery:

153. The upper storeys of the proposal would be visible when looking west from the Golden Gallery and Stone Gallery.
  154. The proposed building would appear at a comparable scale and height to surrounding buildings. 100 New Bridge Street sits closer to the eye of the observer than the application site in this view, and has a height datum of +38mAOD towards the south and +45.6mAOD towards the north, where the massing steps up. In comparison, the proposed building would be +42.2mAOD, positioned to the south of St Bride's church and behind 100 New Bridge Street in the view. 100 New Bridge Street would mask a large proportion of the proposed additional mass on the application site. The proposed massing would be set away from the spire of St Bride's in this view, respecting the presence and verticality of St Bride's, where parts of the proposed massing would be visible – offset to the south of St Bride's Spire - it would be set against a backdrop of modern development.
  155. The southern portion of the top floor, roof terrace and associated landscaping would be partially visible in this view, however, where it would be visible, it would add visual interest to the view, by breaking up the homogenous roofscape with greening, activity and improved architecture. The upper levels have been carefully modelled, leading to an architectural response which is attractive, which would ultimately improve upon the appearance of the existing building and therefore enhance the view.
- The Monument, Views of and from:

156. The Protected Views SPD identifies views of and approaches to the Monument which are deemed important to the strategic character and identity of the City.

Views from the Monument:

157. The application site is located outside The Monument views policy area as identified in figure 7 of the Protected Views SPD, in addition, the proposed application would have a presence in, but would not detract from, Monument View 5.

View 5: North West to St Paul's Cathedral

158. St Paul's Cathedral and St Bride's Church are identified as key features in the view, neither of which would be obscured or detracted from by the proposal. The visual management guidance at paragraphs 4.12 and 4.13 of the Protected Views SPD identified other features in this panorama as St Mary le Bow, the cupola of the Old Bailey, the BT Tower and St Mary Aldermanry, none of which would be obscured or detracted from by the proposal, their skyline presence undiluted.

159. Paragraphs 4.3 and 4.4 makes reference to proposals which affect views from the monument, stating that development should not obstruct the key features in the view. In the existing view, the spire of St Bride's is read against a backdrop of existing buildings, with no clear sky silhouette, much of the main body of the church is enclosed by buildings in its perimeter. The proposals would be offset from St Bride's Church to the south in this view and the height increase would be barely visible to the observer, due to the significant distance of the view location from the application site. The proposals would be offset from St Bride's in the view, being located to the south of the sightline to the spire, the proposed building would also be lower in height than neighbouring buildings and the lowest elements of the spire of St Bride's. The proposed building would sit comfortably with the prevailing roofscape pattern around St Bride's, which would make the proposed building barely perceptible. The proposed massing would therefore not interfere with St Bride's Church, allowing it to continue to be read as a feature on the skyline.

160. As a whole panorama composition, it is considered that the proposals would be compliant with paragraphs 4.3 and 4.4 of the Protected Views SPD, Local Plan Policy CS 13 and emerging City Plan Policy S13, the proposals are therefore considered acceptable in this regard.

City Landmarks and Skyline Features

161. Local Plan Policy CS13 (Protected Views), part 2, also seeks to protect and enhance views of historic landmarks and skyline features. The Protected Views SPD, part 6, identifies St Bride's Church as a Skyline Feature.
162. Views of the St Bride's and its iconic Steeple would be preserved in local, ground level views in close proximity to the site, high level views and in the riparian river prospect views. The massing has been sculpted to protect views of St Bride's from New Bridge Street, where the chamfer on the upper floors of the southeast corner align with views of the Steeple. The proposals would be compliant with Local Plan Policy CS 13 and emerging City Plan Policy S13, and associated guidance in the Protected Views SPD.

### **Heritage**

163. The development is within the Fleet Street Conservation Area, immediately adjacent to the boundary with the Whitefriars Conservation Area. It would affect the setting of the following designated heritage assets:
- St Bride's Church (Grade I listed)
  - The Bridewell Theatre, Bride Lane (Grade II listed)
  - 2 Bridewell Place (Grade II listed)
  - 13 New Bridge Street (Grade II listed)
  - 14 New Bridge Street (Grade II\* listed)
  - 15 New Bridge Street (Grade II listed)
  - 16 & 17 Bride Lane (Grade II listed)
  - Whitefriars Conservation Area

### **Non-designated Heritage Assets**

164. There are no identified local non designated heritage assets which would be affected by the development. The existing office building is not considered to be a non-designated heritage asset. The existing pub does make a positive contribution to the Conservation Area and has been assessed as to whether it is of sufficient individual heritage significance to be considered a non-designated heritage. It is considered it is not a non-designated heritage asset.
165. The potential architectural and historic values of the existing pub has been assessed against the Historic England criteria for selecting non-designated heritage assets contained in 'Local Listing: Identifying and Conserving Local Heritage Advice Note 7'. The criteria comprise: assets type ; age; rarity; architectural and artistic interest; group value;



archaeological interest; historic interest; and landmark status. The assessment is summarised below.

166. Asset type and rarity: The building is a mid-20<sup>th</sup> Century pub. In terms of rarity, the existing pub is of an age and style that is fairly common across London. It represents a generic style of modernism which is unremarkable of the post-war period, with some 'traditionalist' elements which, whilst pleasing, are ubiquitous in other mid to late century City buildings and are otherwise of limited architectural merit.
167. Age: The existing pub was built in the mid to late 1950s. The site was cleared in 1951, prospectively due to bomb damage. The site was previously occupied by a police station and post office. Postwar re-planning and redevelopment of surrounding streets and spaces resulted in the existing built form, to the east, sites east of New Bridge Street were redeveloped towards the end of the 20<sup>th</sup> century. It is not of significant age nor does it form part of a cogent post-war setting of interest.
168. Architectural and artistic interest: The narrow fronted 1950s pub is a modernist building, with some interesting detail and architectural quirks. Its interior is not considered to be of interest. It has a hint of a classic pub idiom, with charming brass finished bay windows, hanging planters and signage which contribute positively to its character. The central bay, with the curved oriel window and the entrance to the pub – offset to the right hand side - are attractive, however, the top floor and elevations either side of the curved bay window lack architectural quality and detail. This elevation sits well on Bridewell Place. St Bride's Tavern, as a grouping, has isolated elements of interest but overall the design and aesthetic values are insufficiently distinctive, despite making a positive contribution to the Conservation Area.
169. Group value: St Bride's Tavern does not have any clear historic or design relationship with surrounding development. There is a limited relationship with its low-quality neighbour, the existing office block. 9 Bridewell Place to the south is an attractive building, but was built in the 1980s in a different architectural style. 1-2 Dorset Rise to the southeast was also built in the late 20<sup>th</sup> century, as part of a large scale post modern redevelopment. The existing pub is part of the 20<sup>th</sup> century piecemeal contemporary transformation of New Bridge Street and Bridewell Place, but the architectural styles vary greatly and there is considered to be no group value of sufficient note to warrant heritage significance.

170. Archaeological interest: The site is likely to have below ground archaeology on site, subject to further detailed investigations, but, the existing pub does not reveal evidence of past human activity.
171. Historic interest: The existing pub has little historic interest as a result of being a relatively modern use on the site with no known strong local associations on the site itself.
172. Landmark status: There are no identifiable communal or historical association or especially striking aesthetic values which make St Bride's Tavern stand out in the local scene, despite having attractive elements on its principal elevation.
173. St Bride's Tavern has limited architectural and historic values . The existing 20<sup>th</sup> century building on Site makes a positive contribution to the local townscape and Conservation Area, but does not meet the criteria to warrant non-designated heritage asset status.

#### Designated Heritage Assets

##### Direct Impact

##### Fleet Street Conservation Area

##### Heritage Significance, Character and Appearance:

174. The character and appearance and heritage significance of the Fleet Street Conservation Area is summarised in detail in the Character Summary and Management Strategy SPD (2016), which is a material consideration. It summaries that core significance and character stem from:
- The focus of Fleet Street, a processional route between Westminster and St Paul's of Royal and State significance since the Middle Ages, and its ceremonial grandeur and commercial bustle created in particular by views of St Paul's Cathedral, St Dunstan's in the West and St Bride's, some of the City's most notable ecclesiastical buildings.
  - Concomitant associations with the printing, newspaper and legal professions; and significant literary figures such as Wynkyn de Worde, Oliver Goldsmith and Dr Johnson.

- The evocative, fine grain network of historic streets, courts, lanes and alleys either side of Fleet Street, and their contrasting intimacy, and which have developed over hundreds of years outside the City walls.
  - The exceptional richness and variety of architecture of virtually all ages and styles and the contrast between them, ranging from domestic Georgian to monumental 20th Century newspaper buildings.
175. The Conservation Area is of considerable local and national architectural, artistic, historical and archaeological significance, drawn principally from the built form and fabric, and to a lesser but significant degree via setting.

Contribution of Setting:

176. Elements of setting make a contribution to significance, and views and vistas deemed integral to that significance are identified in the SPD. The main contributing elements which could be impacted are:
- Approaches and views along the Processional Route, both east and west, towards the Strand and the Royal Courts of Justice to the west and St Paul's to the East. This makes a significant contribution to significance and an appreciation of it.
  - Those sensitive strategic riparian broad prospects from the South Bank Queen's Walk which allow an appreciation of the wider skyline of the Conservation Area in a wider London context, in particular as a picturesque ensemble of national monuments and landmarks lining the Processional Route with a skyline presence to London's River. This makes a significant contribution to significance and an appreciation of it.

Impact:

177. Most of the Conservation Area's significance, character and appearance, would remain 'untouched' and undiluted. The proposal would have no visual or other influence over much of it. It would, however, be visible in views 9 and 18 in the Fleet Street Conservation Area Appraisal. The Conservation Area's significance, character and appearance, would be preserved.
178. With regard the first setting element identified above, the proposed building would be most visible in views south from Ludgate Circus (view 9 of the Fleet Street Conservation Area Appraisal). The proposed massing

would appear behind 1-7 New Bridge Street in this view, 1-6 New Bridge Street is a cluster of Victorian buildings. It would appear in a similar style to other modern commercial buildings on both the north and south side of Ludgate Circus, where modern commercial buildings frame the backdrop of historic buildings in the immediate vicinity of the junction. It would have attractive elevations and a stepped top, which makes the top of the building recessive to the built form on New Bridge Street and Ludgate Hill.

179. The proposal would provide a new, tight knit, pedestrian route, characteristic of the conservation area, which would add to the historic urban grain.
180. The existing office building, which does not make a positive contribution to the character and appearance of the conservation area, and its loss would leave the Conservation Area unharmed, in principle. The height increase would sit comfortably in its context, this is as a result of the tight-knit urban grain and often intimate sense of enclosure which limits the visibility of the application site from much of the Conservation Area.
181. The existing pub is has attractive elements, such as the brass oriel windows, hanging planters and signage, but it has large portions of the principal elevation lacking architectural design quality and detail. It does contribute positively to the character, appearance and significance of the conservation area, but only to a limited extent. The proposed pub would preserve this level of contribution to the character, appearance and significance of the conservation area.
182. In regards to indirect impact on setting, it is also considered the proposal would preserve the conservation area (setting element 2) views from outside the conservation area. In terms of those wider riparian views from the South Bank (Queen's Walk), the proposal would, not obscure, distract or detract from those skyline features of the Conservation Area, in particular St Bride's, allowing this expression of the Conservation Area to still be read in the context of wider skyline monuments such as the Royal Courts of Justice and St Paul's Cathedral. Where it would be seen in association with the spire of St Bride's it would form a complementary high-quality architectural neighbour which would preserve the distinct vertical skyline presence of St Bride's. It would take an appropriate place as part of an established backdrop of a modern taller build development off Fleet Street and New Bridge Street, adding a high-quality new piece of modern architecture. This element of setting which makes a significant contribution to significance would be preserved.

183. Overall, the proposal would preserve the character and appearance and heritage significance of the Fleet Street Conservation Area.

Indirect Impact on Designated Heritage Assets:

St Bride's Church (Grade I)

Heritage Significance:

184. Church of 1671-8 by Sir Christopher Wren with spire of 1701-3, one of Wren's tallest and comprising five octagonal stages of diminishing height. The spire is one of the most distinctive and memorable on the city's skyline. The skyline presence when viewed from the bridges and banks of the Thames makes a significant contribution to significance, especially where the spire can be seen as part of the romantic historic skyline around the Temples to Blackfriars and in association with St Paul's. The church was gutted in the Blitz and restored by Godfrey Allen in 1957.
185. It is of outstanding, national, architectural/artistic, historical, and archaeological significance.

Contribution of Setting:

186. Elements of setting make a significant contribution to architectural and historic significance, in particular an appreciation of it. In relative order of contribution, it is considered that this derives from:
- Pan-London broad riparian views from the River Thames, its embankments and bridges, including strategic LVMF River Prospect views from Waterloo Bridge, Gabriel's Wharf, Hungerford Bridge, Southwark Bridge and London Bridge, where it can be appreciated as a landmark steeple atop the rising banks of the Thames, denoting the Processional Route and seen in complementary juxtaposition with Wren's masterpiece, St Paul's. These make a significant contribution to architectural/artistic and historical significance.
  - Local, often glimpsed, sudden and fleeting local views from Fleet Street, St Bride's Avenue, Bride's Passage and Bride Lane allow for the Wren tower and steeple to be appreciated in an intimate townscape context. This makes a contribution to architectural and historic significance, especially an appreciation of it.

- It's associated historic churchyard and enclosure by complementary historic buildings and streets. This makes a contribution to architectural and historic significance, especially an appreciation of it.

#### Impact:

187. The proposals would not interfere with an appreciation of the distinctive steeple in those designated strategic LVMF River Prospects, as discussed earlier in the report. The spire would remain a prominent feature on London's skyline, with a maintained distinction when seen from numerous locations at ground level across the City. The massing has been sculpted to preserve views of the spire from New Bridge Street.
188. Whilst no existing local view would be substantially changed, the top of the proposed building would be visible from within parts of the Churchyard. Existing buildings form a strong sense of enclosure around the Church, and the proposals would not substantially or negatively alter the existing condition. Furthermore, there would only be very limited views of the increased height and mass and, where the top of the building would be visible, it would not infringe on the spire of the church. Those elements of setting identified above would be preserved.
189. The proposals would preserve the significance of St Bride's Church and an appreciation of it.

#### 2 Bridewell Place (Grade II)

#### Significance

190. 2 Bridewell Place was designed in 1885 by Champneys as the former St Bride's Vicarage. Finished in red brick in a mid-17th century style, the building has a steeply pitched slate roof with moulded dressings that articulate the façade. It is a handsome terminus to northerly views along Bridewell Place.
191. The south elevation is viewed in the context of several other nearby listed buildings, the application site sits in between 12 Bridewell Place (Grade II listed) and 2 Bridewell Place in these views. The building derives architectural and artistic interest from its fine south elevation. Its status as the former vicarage of St Bride's give it of historic interest.
192. Overall, the building is considered to be of architectural, historic and artistic heritage significance, in the main contained in the physical fabric of the exterior, with a contribution from its setting.

### Setting

193. The elements of setting which contribute to the building's architectural and historic significance are:

- Views of the south elevation, which terminate the views facing north on Bridewell Place, have an open aspect which allows the historic elevation to be appreciated in its entirety and within the context of other listed buildings. Its historic neighbours are typically from the Victorian period, although the design, appearance and materiality of No.12 Bridewell Place is different. Nonetheless, this element of setting makes a modest contribution to its architectural and historic significance, in particular an appreciation of it.
- It's physical proximity to St Bride's Church and Institute, with which it has a historical association. This makes a contribution to significance and an appreciation of it.

### Impact

194. The proposals would preserve the contribution of this kinetic approach from the south towards 2 Bridewell Place makes to significance, the refreshed facades would improve upon the existing elevations. The provision of a pedestrian route, framed by an attractive public house, would replace the existing service bay and courtyard. The existing party wall which extends outwards from the façade of 2 Bridewell Place, would be opened up against the new route through.

195. The existing office building has no architectural merit and does not make a positive contribution to the setting of 2 Bridewell Place. The existing pub does have limited architectural merit but is not considered to be a setting element which supports the significance of 2 Bridewell Place. The proposed materiality would be appropriate, sitting comfortably with the adjacent context. The fenestration and detail of the façade would provide greater articulation and interest than the existing elevations. The proposed height increase of the building would have a benign impact on the setting of 2 Bridewell Place because in views from the south, the proposed bulk and massing would appear comfortable relative to the current surroundings

196. Overall, the proposal would preserve the special architectural and historic interest, setting and significance of 2 Bridewell Place.

The Bridewell Theatre, Bride Lane (The St Brides Foundation Institute and Library) (Grade II)

Significance

197. The Bridewell Theatre was originally designed in 1893-4 by Robert C Murray, with some modifications in the late 20th century, which included the conversion of the swimming pool to a theatre. Finished in red brick with a steeply pitched slate roof, it has handsome and a well detailed north elevation.
198. The north elevation is situated on Bride Lane, where the close knit nature of the street focusses the observers interest on the westernmost bay of the north elevation when viewed from the north, where it sits prominently and comfortably. Nearby listed buildings make a positive contribution to the historic character and appearance of Bride Lane, supporting the institutes historic setting. The external appearance of the building gives it architectural interest.
199. Despite being altered, the interior still possesses features of interest including the robust structural frame used to accommodate the heavy floor load requirements of the printing machinery and plates and from the former reading room with a strapwork plaster ceiling and panelling.
200. In 1890-1 the Charity Commissioners made money available for technical training, including printing, an industry that was rapidly developing at this time. The St. Bride Foundation Institute was set up in 1893 for printing education, with a strong social and recreational function provided in the original swimming pool, gymnasium, lending library, and a collection of books. The building derives historic significance from these associations
201. It is of architectural, historic and artistic heritage significance, on the main contained in the physical fabric of the exterior and interior, with a contribution from its setting.

Setting

202. The element of setting that makes a contribution to the architectural and historic significance is:
  - The cluster of listed and historic buildings in close proximity, namely 16-17 Bride Lane, St Bride's Church and 98-100 Fleet Street, positioned in a tight urban grain with narrow streets that have a townscape character typical of the conservation area.



### Impact

203. The proposals would have no impact on the approach towards the Bridewell Theatre from Fleet Street, on the north-south orientated stretch of Bride Lane, the tight knit nature of the streets would result in the application site remaining hidden.
204. The application site would appear as the observer is within several metres of the entrance of the building, where it would be seen in views east along Bride Lane. In this view, the existing building appears tired, and it turns its back on the street with little visual permeability at ground level or on the upper levels. The party wall at ground level extends out, offering a sheer and blank elevation to terminate views east. The existing office building is considered to be of no architectural merit, and does not make a contribution to the setting of the Bridewell Institute. The proposals would offer greater colour and articulation and so create visual interest, with a more open ground floor. The proposed height increase would have no impact on the setting of the building. The top floors are recessive and step back at a high level, reducing their prominence when viewed at street level. The observer would have to look up almost directly to observe the increased height. Unlike the existing building, the upper floors would be attractively designed.
205. Overall, the proposal would preserve the special architectural and historic interest and setting of the St Bride's Institute.

### 16 & 17 Bride Lane (Grade II listed)

#### Significance

206. 16 & 17 Bride Lane was originally designed in 1840 as the former St Bride and Bridewell Precinct School. Finished in yellow brick with Portland Stone dressings in a classical style, it has round head arched openings and a pitched roof. It is a stocky but handsome building which adds to the variety richness of historic buildings along Bride Lane. The south elevation is only visible when stood close to the site frontage, due to the narrowness of Bride Lane. A sliver of the east elevation is visible from New Bridge Street.
207. The external appearance of the building possesses architectural interest. Its age, and former use as the St Bride's and Bridewell Precinct School make a significant contribution to historic interest.

208. It is of architectural and historic heritage significance, in the main contained in the physical fabric of the exterior, with a contribution from its setting.

#### Setting

209. The elements of setting which make a contribution to the architectural and historic significance are:

- It's immediate historic townscape context of complementary varied architectural styles on a historic street. This makes a contribution to significance, in particular an appreciation of it.
- The historic association with the parish of St Bride's, in close physical and visual proximity to St Bride's Church and the St Bride's Institute. Views from the east, as highlighted in the Fleet Street Conservation Area Appraisal, where views from New Bridge Street down Bride Lane reveal a layering of historic facades positioned around a tight knit street. This makes a significant contribution to historic significance and an appreciation of it.

#### Impact

210. The proposals would have a benign impact on views of Bride Lane when looking east from New Bridge Street. The proposal would result in the loss of a building which doesn't make a contribution to significance, replacing it with one which makes a better contribution to that associated cogent historic grouping which together make a significant contribution to significance, which would remain undiluted.
211. Overall, the proposal would preserve the special architectural and historic interest, setting and significance of 16 & 17 Bride Lane.

#### 12 Bridewell Place and 13 New Bridge Street (Grade II)

#### Significance

212. 12 Bridewell Place and 13 New Bridge Street was designed by Richards Roberts in 1873-1874, the listing covers both 12 Bridewell Place and 13 New Bridge Street in one listing and is Grade II listed.
213. The building possesses historical interest for being a high quality example of Victorian townscape and architectural interest for the design and appearance, which is reinforced by the materiality, composition of elements and decorative detailing of each elevation.

214. It has architectural, historic and artistic heritage interest, in the main contained in the physical fabric of the exterior but with a contribution from setting.

#### Setting

215. The listed building sits as part of a small urban block bounded by Bridewell Place and New Bridge Street. The adjacent listed building 14 New Bridge Street, and the wider block, makes a positive contribution to its setting. When the block is viewed as a whole, it reads as a coherent piece of 19<sup>th</sup> century townscape. 12 Bridewell Place and 13 New Bridge Street has a strong relationship with its neighbours on New Bridge Street, both 14 and 15, a broadly consistent building height pattern, a regular composition of fenestration, cornices and more intricate detailing establishes a commonality of character and appearance. It is the mutual and interlinked character and appearance of each of these buildings which makes a positive contribution to each of their settings, and that reinforces their architectural and historical significance.

#### Impact

216. There would be intervisibility between the application site and 12 Bridewell Place and 13 New Bridge Street (Grade II). When viewed from the south on New Bridge Street it would read as modern development situated within the next urban block on from the listed building, detached by the road Bridewell Place. The proposed height, bulk and massing would give the building greater prominence, however, to an extent which is not substantially different to the existing scenario. In addition, the building would have an improved design and appearance. The listed building is considered robust enough to accommodate this sort of modest change within its setting, as would the wider 19<sup>th</sup> century urban block of which it forms part, and which contributes to its significance
217. The proposals would be seen in the backdrop of 12 Bridewell Place and 13 New Bridge Street, when viewed from the south on Bridewell Place. An increase in building mass would be present. The tired and dated elevations, which do not make a positive contribution to the setting of the listed building, would be refreshed as part of the refurbishment. The increased mass is recessive, setback and attractively modelled, and would not be detrimental to the setting of the listed building.
218. As a result, the proposals would preserve the special architectural and historic interest and setting of 12 Bridewell Place and 13 New Bridge Street.

#### No.14 New Bridge Street (Grade II\*)

### Significance

219. 14 New Bridge Street is the former Bridewell Gatehouse, from the rebuilding of the Bridewell Hospital by James Lewis, in 1802-1808. It possesses historic interest for its associations with the former Bridewell Gatehouse on the site; with its fine, simple classical elevation the building is a rare example of Georgian architecture in a City context, and possesses a high level of architectural/artistic interest.
220. It has architectural/artistic and historic interest, on the main contained in the physical fabric of the exterior but with a contribution from setting.

### Setting

221. The listed building sits as part of at the centre of a small urban block bounded by Bridewell Place and New Bridge Street, with its principal elevation facing New Bridge Street. Its neighbours, both 13 and 15 New Bridge Street are Grade II listed and they make a positive contribution to its setting.
222. When viewed from New Bridge Street, the listed building has a distinct relationship with its neighbours. The buildings each side have a broadly consistent building height, a regular and ordered composition of fenestration, intricate detailing which establishes a commonality of character and appearance. It is the mutual and interlinked character and appearance of each of these buildings which makes a positive contribution to the setting of 14 New Bridge Street, and that reinforces their architectural and historical interest.

### Impact

223. The application site would be visible in the backdrop of the listed building. When viewed from the south on New Bridge Street, it would read as modern development situated within the next urban block on from the listed building, with the Grade II listed 13 New Bridge Street sat in between the two.
224. The proposed height, bulk and massing would increase the visibility of the application site on the street scene, however, not to an extent greatly different from the existing condition. The building would continue to be read as commercial development in the background of a historic urban block and it would have an improved design and appearance with its refreshed facades. It is considered that the listed building and its setting is robust enough to accommodate modest change in its context without harm being caused to its significance by way of altering its setting.

225. As a result, the proposals would preserve the special architectural and historic interest and setting of 12 Bridewell Place and 13 New Bridge Street.

#### No.15 New Bridge Street

##### Significance

226. 15 New Bridge Street a sophisticated channelled stone-fronted refurbishment, built in 1908-1909. It possesses historical interest for being a high quality example of Victorian townscape and architectural interest its design and appearance. This is on the main contained in the physical fabric of the exterior but with a contribution from setting.

##### Setting

227. The buildings sit as part of a small urban block bounded by Bridewell Place and New Bridge Street, with the aforementioned listed buildings, as part of a set piece of 19<sup>th</sup> century townscape. 15 New Bridge Street has a strong relationship with its neighbours, namely, broadly consistent heights, a regular composition of fenestration and intricate detailing which is loosely consistent across each listed buildings New Bridge Street elevation. As above, it is the mutual and interlinked character and appearance of each of these buildings which makes a positive contribution to each of their settings, and that reinforces their architectural and historical interest.

##### Impact

228. There would be intervisibility between the application site and No.15 New Bridge Street. When viewed from the south on New Bridge Street the application site would read as modern commercial development sat within the backdrop of the listed building, with 13 and 14 New Bridge Street sitting as a buffer between the two.
229. There would be a height increase, making the application site more visible and prominent, albeit with 13 and 14 New Bridge Street offering a historic mediating backdrop between the listed building and the proposed building. The proposed building would have an improved design and appearance and would continue to be read as commercial development in the background of historic buildings It is considered that the listed building can accommodate modest change in its context without harm being caused to its significance by way of altering its setting.
230. As a result, the proposals would preserve the special architectural and historic interest and settings of 15 New Bridge Street.

#### Whitefriars Conservation Area

231. The application site is in the setting of the Conservation Area. The heritage significance of Whitefriars Conservation Area is covered in detail in the Character Summary and Management Strategy SPD (2016). It summarises its significance as stemming from:

- An impressive collection of consistently high quality late Victorian/Edwardian commercial and institutional buildings on land reclaimed and comprehensively planned by the Corporation resulting in a more regular grid plan, a rare instance of formal townscape in a City context
- An array of consistently high quality Victorian and Edwardian commercial and institutional buildings with varied architectural styles and land uses including the former Whitefriars friary precincts, domestic tenements, industrial works and commercial HQs, in addition to a historic association with the press and newspaper production
- The setting of grand Victorian urban infrastructural, engineering and urban planning interventions, namely Blackfriars Bridge, Victoria Embankment and New Bridge Street.
- An important wider context to the Temples and as foreground to St Paul's Cathedral in sensitive riparian views.

232. The Conservation Area is of a high level of architectural, artistic, historical and archaeological significance, drawn principally from the built form and fabric of the Conservation Area and its archaeology, and to a lesser but significant degree via setting.

Contribution of Setting:

233. Elements of setting make a substantial contribution to significance, manifesting principally in views across and through the Conservation Area. The main contribution derives from the following in descending order of contribution:

- Strategic pan-London riparian views from Hungerford and Waterloo Bridges and from the South Bank Queen's Walk comprising open river prospects across the City skyline. These make a significant contribution to architectural and historic significance, in particular and an appreciation of it.

- Views from the immediate environs of the Temples and Fleet Street Conservation Areas, in particular from the Victorian Embankment and the river towards Fleet Street which allow for a more enriched appreciation of a wider historic setting. These make a contribution to significance and an appreciation of it.

Impact:

234. The Conservation Area lies to the south of the proposal site and shares some intervisibility with the Conservation Area.
235. In regard to setting element 1, the proposal would appear in the near wider setting of the Conservation Area from broad riparian river prospects from the South Bank, to the southeast of the application site. From here, Whitefriars and the adjoining Temples Conservation Area command the foreground setting and scale of an open prospect across the River. Their respective pre-eminent skylines would be preserved, and the visibility of the proposed building would be very limited.
236. In regard to setting element 2, the proposal would be visible in View 3 of the Conservation Area SPD. In this view, buildings in the foreground on the west side of New Bridge Street are typically grand, Victorian, masonry buildings, which are typical of the Conservation Area and form a strong edge to its boundary. There is modern commercial development on the northern end and east side of this view. The existing building is only slightly visible from this viewing point, appearing slightly taller than its neighbours. The proposal would not significantly alter the view, with the increased height and mass only being visible to a limited degree, and not to an extent which is disproportionate when compared to buildings on the other side of the street. In this view, the strong edge which captures the essence and identity of the Conservation Area, formed by 100 Victoria Embankment, 19 New Bridge Street and 12-18 New Bridge Street, would be maintained.
237. Furthermore, the building would also be visible in View 13 of the Conservation Area SPD. Here, only the uppermost parts of the building would be visible, if at all. The existing building has little architectural merit and does not make a positive contribution to the setting of the Conservation Area in this view. The proposed materiality would be appropriate, sitting comfortably with the adjacent context. The fenestration and detail of the façade would provide greater articulation and interest than the existing elevations. The proposed height increase of the building would have little impact on the setting of the Conservation Area.

238. Whilst the increased mass would enhance the prominence of the building in some fleeting and transitory views, the top has been modelled to be lightweight and recessive, it would be read in a similar fashion to the existing building and context and would not harm the setting of the Conservation Area. It is important to note that the scale of the proposals is relatively small in relation to the setting of the Conservation Area as a whole, therefore the impact on the setting of the Conservation Area would be minimal.

239. Overall, the proposal would preserve the contribution of setting to the significance of the Conservation Area.

#### Other Designated Heritage Assets

240. The definition of setting is the extent to which an asset is 'experienced', which is not geographically set and can change over time, relating to more than just a direct visual influence. Given the dense central London location, the site is within the setting of a number of heritage assets, and it would be disproportionate to assess them all. As part of a scoping exercise, this assessment is in accordance paragraph 194 of the NPPF and is deemed proportionate and no more than is sufficient to understand the potential impact on significance. In accordance with paragraph 195 we scoped a great number of potentially affected assets accounting for the evidence and necessary expertise and found that their significances would be preserved. This included:

- 100 Victoria Embankment
- 19 New Bridge Street
- 174 Queen Victoria Street
- 82-85 Fleet Street
- 90-94 Fleet Street
- 96 Fleet Street
- 98, 99 and 100 Fleet Street
- Blackfriars Bridge

241. The settings and the contribution they make to the significance of the listed buildings, would not be adversely affected by the proposals due to the relative distance of the proposal where it would not appear unduly prominent. The proposed development would not harm the setting or the contribution that the setting makes to the significance of these listed buildings.

242. The assets assessed in detail here are considered sufficient to understanding the impact on significance.



### Conclusion: Heritage

243. The proposal would preserve the character, appearance and heritage significance of the Fleet Street Conservation Area. The proposal, by way of impact on setting, would preserve the heritage significance of numerous heritage assets, and an appreciation of that significance. The proposal would accord with London Plan Policy HC1, Local Plan Policies CS 12, DM 12.1 and DM 12.2 and policies in the NPPF.

### Archaeology

244. Policy DM12.4 of the Local Plan 2015 and policy HE2 of the draft City Plan 2036 outline the requirements with regards archaeology, outlining that the City will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking inclusive access to, public display and interpretation where appropriate.
245. Then applicant has submitted a Written Scheme of Investigation for an Archaeological Watching Brief and Evaluation Phase 1, prepared by MOLA, for the proposed site investigations works. The Greater London Archaeological Advisory Service (GLAAS) has reviewed this with MOLA and has confirmed that the document accords with relevant standards and guidance. GLAAS have recommended a condition requiring a timetable and scheme of archaeological evaluation.

### Cultural Plan

246. Local Plan policies CS11 and DM11.2 and emerging City Plan policy S6 encourage new cultural experiences and art works and requires major development to provide a Cultural Plan. The City of London Cultural Policy seeks to improve the City's public realm, open spaces and gardens to make them more open, distinct, welcoming and culturally vibrant. The site is located close to the south-eastern edge of the City and the proposal incorporates several elements which will improve the cultural enjoyment of the site which support the Destination City and Culture Mile aspirations.
247. The Applicant has submitted a draft Cultural Plan in accordance with emerging City Plan Policy S6 and this includes initial visions for the site which will be secured within a S106 including an art wall on the western wall of Bridwell Passage which would be designed collaboratively with adjacent owners including the neighbouring St Brides Foundation. The applicant has been in discussions with St Brides Foundation and is working to further develop proposals which would support their events and celebrate the rich history of the surrounding area.

248. The S106 will require the applicant to work with a cultural strategist, timelines and key milestones for delivery for an overall Cultural Strategy and long-term management plan.

### **Sustainability**

#### **Circular Economy**

249. 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 DM 17.2 set out the City's support for circular economy principles.
250. The submitted Circular Economy Statement describes the strategic approach to incorporating circularity principles and actions into the proposed development, in accordance with the GLA Circular Economy Guidance.
251. The applicants have reviewed the consented 2014 development on site and amended the design strategy for the development to embed circular economy principles following the analysis of 3 design options:

Option 1 – Light Refresh: Updated finishes, no major structural external works and would not require planning permission.

252. There would be advantages in terms of cost and delivery time, however, the overall quality of the building cannot be improved to meet current expectations. As a result of the poor air quality, heat loss, daylight and solar gains, the existing building would also remain operationally inefficient which would negate the embodied carbon savings from the reduced material schedule required to refresh the building finishes. Additional works would likely to be required in the near future.

Option 2 – New Build (as consented from application 14/00254/FULMAJ): Demolition (to basement) and redevelopment of the site for an office building with commercial uses at ground floor.

253. The consented scheme would improve the quality of the building environment and operational efficiency, however, embodied carbon emissions of the total redevelopment from required material resources, construction and on-site waste production would be high.

Option 3 - Deep retrofit:

Summary: Reuse of the key structure and basement (including existing stairs), inclusive of internal and external refurbishment to create an office building with retail uses.

254. The 'Deep Retrofit' approach seeks alignment of the development with the current London Plan, by aiming to retain in excess of 70% of the buildings substructure and superstructure elements whilst installing photovoltaics and high efficiency air source heat pumps to reduce grid electricity consumption. This option is likely have lower associated embodied carbon emissions as a result of the retained elements and would also enhance local biodiversity and urban greening through planting and green roofs. This option has therefore been considered the most appropriate for the scheme.
255. The development proposal has been developed to retain approx. 72% of the volume of structure and substructure, and 50% volume of the stair cores, to enable a deep retrofit and refurbishment.
256. The new development will encompass a wide range of circularity principles that include:
- Modular façade design to enable off-site manufacture and minimising waste
  - Minimising material usage and optimising the design to achieve durable and adaptable spaces
  - Maximising the use of recycled and renewable materials, including cement replacement products
  - Adaptable and flexible MEP systems
  - Design for disassembly of the new building elements at the end of the building life.
257. Further details that address all aspects of circular economy are required after the detailed design phase. A Detailed Circular Economy Assessment and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm that high aspirations can be achieved have been requested by conditions. The detailed assessment will be expected to demonstrate that the relevant targets set out in the GLA Circular Economy Guidance can be and have been met.

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

258. The Energy Statement accompanying the planning application is based on the Part L 2013 of the Building Regulations due to submission of the application prior to the launch of Part L 2021. The statement demonstrates that the development has been designed to achieve an

overall 68% reduction in regulated carbon emissions compared to a Part L 2013 Building Regulations compliant building.

259. The proposed energy demand reduction strategy aims at significant energy efficiency improvements over Part L 2013, in relation to fabric, heating, ventilation, air conditioning and lighting. The majority of the energy demand results from domestic hot water use which cannot be reduced through energy efficiency improvements, however, the proposed measures would cumulatively reduce the building's operational carbon emissions by 47% compared to a Part L 2013 Building Regulations compliant building.
260. The risk of overheating would be addressed by minimising internal heat generation through energy efficient design and reducing the amount of heat entering the building by a high level of insulation, efficient glazing ratio and glazing specifications as well as creating deep recessed window openings.
261. There is currently no available district heating network close enough to the site, however, the opportunity to connect to a future district heating network would be incorporated into the proposed development.
262. In relation to renewable energy technologies, a variable refrigerant flow (VRF) air source heat pump system to provide the heating and cooling for the whole building as well as domestic hot water for the basement and ground floor would be installed. Combined with 15sqm of photovoltaic panels on the roof, it is expected that a 21% reduction of carbon emissions compared to a Building Regulations compliant building can be achieved through renewable technologies.
263. The site-wide energy strategy demonstrates compliance with the London Plan carbon emission reduction targets. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

## **BREEAM**

264. A BREEAM New Construction 2018 (shell and core) pre-assessment has been prepared, targeting an "excellent" rating, with the aspiration to achieve "outstanding". 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 73.55%. The pre-assessment is on track to achieve a high number of credits in the CoL's priority categories of Pollution and Materials, as well as the climate resilience credit in the Waste category. Scores in the other 2 priority categories of Energy and Water are lower, however, further credits are considered to be potentially achievable. These are intended to be targeted in the detailed design and fit-out phases of the development to achieve an "outstanding" score of 91.02%.

265. 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.

#### **WELL v2 Building Standard**

266. The WELL standard is a third-party wellness-focused certification scheme, with a ratings level range from bronze to platinum. The development design aspires to a "WELL v2 Core Gold" standard in order to deliver a high health and wellbeing performance.

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

267. 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.
268. The submitted Whole Life-Cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table below. Further improvements are sought during the forthcoming detailed design stage to reach the Standard Benchmark, such as the use of cement replacement products, higher recycled content in steel, influencing product specification and reducing quantities of refrigerants within the VRF system that has a very high global warming potential. The latter is directly related to the high percentage of contribution to embodied carbon emissions from services/MEP in the In-Use Stages – replacement and maintenance (B1-B5).

269. Embodied carbon emissions at planning application stage:

Scope	Proposed Redevelopment	Benchmark	Benchmark Source
RICS Components	kgCO2/m2	kgCO2/m2	
A1-A5	750	950	GLA Standard
		600	GLA Aspirational
		600	LETI 2020 Design
		350	LETI 2030 Design
A–C (excluding B6- B7)	1530	1400	GLA Standard
		1400	RIBA Business as Usual
		1180	RIBA 2021 Good
		970	RIBA 2025
		970	GLA Aspirational
		750	RIBA 2030
A-C (including B6- B7)	2319		

270. These figures would result in overall (including operational carbon emissions B6 and B7) whole life-cycle carbon emissions of 17,950,111 kgCO2 being emitted over a 60-year period.

271. Over the proposed building's design life of 60 years, the upfront embodied carbon emissions calculations at planning stage demonstrate a reduced amount of carbon emissions compared to the Greater London Authority's standard benchmark emissions target. It is anticipated that during the detailed design stage further improvements can be achieved, in particular in the product stages A1 – A3 of the building's life-cycle by careful choice of materials and structural optimisation. The whole life-cycle carbon emissions would slightly exceed the GLA's standard benchmark, considered to be a result of the greenhouse gas emissions associated with the proposed MEP services strategy that is designed to work with the relatively low existing floor to ceiling heights.

272. 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**

273. The existing site contains little in the way of urban greening apart from a semi-mature Silver Maple tree (on the north corner of the site). The development would include an extensive range of soft landscaping features which would include several urban greening features through green roofs (272sq.m), public realm planters, planter window boxes (New Bridge Street), raised planters, trees (20sq.m) and green wall (51sq.m) via climbers. These features would enhance urban greening, biodiversity and visual interest not just to the site but also to the wider area which is dominated by hardscaped features.
274. The green roof terraces are proposed at Levels 4, 7 and 8 to provide private amenity spaces for building's occupiers and Level 9 would feature a rooftop garden space. Level 4 would include green wall climbers/raised planters and provide views towards St Bride's Church. Levels 7 and 8 are linear and narrow roof terrace spaces which run along the north, south and eastern elevations. On the perimeter of these terraces would include raised planters/green wall climbers similar to Level 4. Level 9 would be the largest of these amenity spaces and therefore offers more opportunity for use of these spaces by the building's occupiers. The outdoor private areas on the terraces would provide important amenity spaces for the occupiers of the building.
275. A mix of planting species have been selected to enhance biodiversity. The inclusion of permeable paving is welcome to avoid rainwater run-off from the site. Consideration should be made for the provision of integrated rainwater harvesting, attenuation system and the inclusion of bird boxes (nest bricks and mounted nest boxes) which could be used by many species set out in the Biodiversity Action Plan (BAP).
276. Local Plan Policies DM10.2 (Design of green roofs and walls), DM10.3 (Roof gardens and terraces) and DM19.2 (Biodiversity and Urban Greening) encourage the inclusion of green roofs, gardens and walls. The biodiverse features would provide a green and attractive setting as there are hard roof surfaces on the existing and some of the surrounding buildings and would result in a net gain in biodiversity value to the site. The landscaped roof terraces would serve as important amenity spaces for occupiers of the buildings with views across the City. The green walls and climbers would assist in improving biodiversity and appropriate plant species should be carefully selected for the living walls depending on their aspect.
277. The addition of the trees, planting, green roofs and green walls 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 (Policy DM19.2), rainwater run-off, insulation and urban cooling. The proposals therefore accord with Local Plan policies DM10.2, DM10.3 and DM19.2.

278. An Urban Greening Factor (UGF) calculation score has been submitted with the application and the UGF for this application has been calculated as 0.28 (London Plan) based on the information provided, which falls slightly short of the London Plan target score. However, if based on the City's draft Local Plan UGF it would score 0.31, which would exceed the target score of 0.3 for commercial development.

### **Conclusion**

279. 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.
280. The proposed development, by way of its central location within London, its opportunities for providing a positive and healthy living environment, and its environmental credentials, would positively contribute to the economic, social and environmental sustainability of the City of London. The proposed sustainability strategy compares positively with the aims and policies of the London Plan and the Local Plan, and the development targets an "excellent" BREEAM assessment rating.
281. The proposals indicate that Whole Life-Cycle Carbon emissions can be significantly reduced by retaining a significant amount of the structure, improving on the GLA's standard benchmark. Circular Economy principles can be positively applied to achieve a long term, robust, low carbon, flexible and adaptable development. The building design responds well to climate change resilience by reducing solar gain, 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.

### **Fire Safety**

282. Policy D5 of the London Plan states that development proposals should be 'designed to incorporate safe and dignified emergency evacuation for all building users. Policy D12 of the London Plan states that 'in the



interests of all building users, all development proposals must achieve the highest standards of fire safety’.

283. The District Surveyors Office has reviewed the submitted Fire Statement and has confirmed that they are satisfied that the proposals comply with policies D5 and D12 of the London Plan.

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

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

#### **Daylight, and Overshadowing** **Assessment Context**

285. An assessment of the impact of the proposed development on the daylight and sunlight received by surrounding residential buildings and public amenity spaces, has been submitted in support of the application. The effects of the development have been assessed having regard to the recommendations in BRE Report 209, Site Layout Planning for Daylight and Sunlight: A guide to good practice (published 10<sup>th</sup> June 2022).
286. Policy DM10.7 of the Local Plan seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the BRE guidelines. Policy DE8 of the emerging City Plan 2036 requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards, taking account of the BRE guidelines.
287. The BRE guidance advises that numerical values are not to be rigidly applied but recognise the specific circumstances of each case. This is acknowledged in the supporting text to policy DM10.7 which states that “The Building Research Establishment (BRE) has issued guidelines that set out several methods of assessing changes in daylight and sunlight arising from new developments. The City Corporation will apply these methods, consistent with BRE advice that ideal daylight and sunlight

conditions may not be practicable in densely developed city centre locations”.

### **Daylight**

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

### **Sunlight**

290. Regarding sunlight, the BRE guidance recommends that all main living rooms of dwellings should be checked if they have a window facing within 90 degrees of due south. The available sunlight is measured in terms of the percentage of annual probable sunlight hours (APSH) at the centre point of the window. Probable sunlight hours are defined as “the long-term average of the total number of hours during a year in which direct sunlight reaches the unobstructed ground (when clouds are taken into account)”. Sunlighting of a dwelling may be adversely affected if the centre of the window:
- Receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March; and
  - Receives less than 0.8 times its former sunlight hours during either period; and
  - Has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.

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

### **Daylight and Sunlight Assessment**

#### **St Brides Church and Rectory**

292. St Brides Church and the associated Rectory, which contains residential accommodation, are located to the north-west of the proposed development, with windows facing predominately south and east which are not within the direct line of sight of the proposed development. The VSC results indicate that there would be no noticeable impact on levels of daylight as the reduction is negligible (0.07%).

#### **26-30 Bride Lane and 98-101 Fleet Street**

293. These properties are located to the north-west of the proposed development with windows facing predominately south. Residential use commences at first floor level. The applicant has assessed the windows with the most direct view of the proposed development. The majority of the view from these windows is obstructed by neighbouring buildings immediately to the south. The VSC results indicate that there would be no change in daylight levels.

#### **24 Bride Lane**

294. This property is located to the north of the proposed development. Residential use commences at second floor level and windows face predominantly east. Any view of the proposed development would be very obtuse and obstructed by neighbouring buildings. The VSC results indicate that there would be no change in daylight levels.

#### **8-9 Bride Court**

295. This property is located to the north-west of the proposed development. Residential use commences at first floor level, with windows facing predominantly south. Any view of the proposed development would be obstructed by neighbouring buildings. The VSC results indicate that there would be no change in daylight levels.

#### **2-3 New Bridge Street**

296. This property is located to the north of the proposed development. Residential use commences at second floor level and windows face predominantly west. Any view of the proposed development would be very obtuse and obstructed by neighbouring buildings. The VSC results indicate that there would be no change in daylight levels.

#### **2 Bride Court/4-5 New Bridge Street**

297. This property is located to the north of the proposed development. Residential use commences at second floor level with windows on two elevations facing predominantly west and south. Any view of the proposed development would be very obtuse from the west facing windows and obstructed by neighbouring buildings from the south facing windows. The VSC results indicate that there would be no change in daylight levels.

The Bridewell Theatre, 12-14 Bride Lane

298. This property is located directly to the west of the proposed development. It is understood that the residential part of the building is within the north-west section of the building, served predominantly by windows facing north and west, away from the proposed development. Any view of the proposed development would be very obtuse and obstructed by neighbouring buildings. There would be no view of the proposed development from these windows, and assessment is therefore not required.

95-96 Fleet Street

299. This property is located to the north-west of the proposed development. Residential use commences at first floor level with windows facing predominantly south. Any view of the proposed development would be obtuse and obstructed by neighbouring buildings. The VSC results indicate that there would be no change in daylight levels.
300. There are no residential windows facing the proposed development within 90 degrees of due south in any of the neighbouring building and there would therefore be no impact on sunlight.

**Daylight and Sunlight Conclusion**

301. The impact of the proposed development on daylight and sunlight levels on the nearby properties and amenity spaces will be negligible.

Light Pollution

302. 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. A condition is recommended requiring the submission of a lighting strategy, which would include details of internal lighting levels, controls and management measures to minimise light spill.

Overlooking

303. There would be no direct overlooking of neighbouring residential properties.

### **Wind Microclimate**

304. Computational Fluid Dynamics (CFD) simulation and analysis has been carried out in accordance with the City of London's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.
305. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways, building entrance and private roof terraces. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being five Comfort Categories defining conditions suitable for frequent sitting, occasional sitting, standing, walking and uncomfortable.
306. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
307. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as a result of development. If wind conditions become windier but remain in a category suitable for intended use, or if there is negligible or beneficial effect, wind mitigation is not required.
308. Three configurations have been tested:
- Configuration 1: Existing site with existing surrounding buildings (the baseline scenario);
  - Configuration 2: Proposed development with existing surrounding buildings; and
  - Configuration 3: Proposed development with cumulative surrounding buildings.

### **Streets and Building Entrances**

#### ***Configuration 1/Baseline Scenario: Existing Site with Existing Surrounding Buildings***

309. The developments in the surrounding are densely packed together, which reduces the amount of wind flow through these areas. New Bridge Street is more open and is, therefore, a more favourable area for the wind to flow through. This results in wind conditions during the windiest season being a mixture of frequent sitting and occasional sitting use in the majority of

the nearby surrounding areas, with standing use conditions along New Bridge Street and around building corners. The windiest conditions are situated south-east of the site, near the junction of New Bridge Street and Queen Victoria Street and along Blackfriars Lane, with walking and uncomfortable conditions.

- 310. There are strong winds in a small area near the junction of New Bridge Street and Queen Victoria Street, at the southern corner of the existing building.
- 311. During the summer season, wind conditions are calmer. The majority of locations have frequent sitting and occasional sitting use wind conditions, with localised standing use conditions on New Bridge Street and walking use near the junction of New Bridge Street and Queen Victoria Street.

*Configuration 2: Proposed Development with Existing Surrounding Buildings*

- 312. The proposed development would be similar in height to that of the existing building, and to surrounding buildings. Therefore, with the inclusion of the proposed development wind conditions would be similar to that of the baseline scenario. Pedestrian thoroughfares in the nearby surrounding area would have wind conditions ranging from being suitable for frequent sitting to standing use, with walking and uncomfortable wind conditions near the junction of New Bridge Street and Queen Victoria Street, and on Blackfriars Lane. Walking and uncomfortable wind conditions would be one and two categories windier than desired, respectively. However, these conditions are present in the baseline scenario and would not worsen with the inclusion of the proposed development. Therefore, mitigation measures would not be required.
- 313. Entrances to the proposed development and to the existing surrounding buildings would range from suitable to frequent to suitable for standing. Therefore, conditions would be suitable for the intended use and mitigation is not required.
- 314. Strong winds would be anticipated near the southern corner of existing buildings at the junction of New Bridge St and Queen Victoria St. As these winds would be present in the baseline scenario and would not be made windier with the inclusion of the Proposed Development, mitigation measures would not be required.

*Configuration 3: Proposed Development with Cumulative Surrounding Buildings*

315. The cumulative schemes would be situated to the north-west, north, east and south-east of the proposed development. As such, the prevailing winds would have interacted with the proposed development ahead of the cumulative schemes and cumulative interactions would, therefore be limited. Wind conditions in the context of the consented cumulative schemes would therefore be similar to those of Configuration 2 in the immediate vicinity of the proposed development.
316. At ground level during the windiest season there would be an increase in the proportion of standing use conditions on New Bridge Street west of the proposed development and on Fleet Street relative to Configuration 2. Similarly, there would be an increase in the extent of walking use and uncomfortable conditions at the junction of the New Bridge Street and Queen Victoria Street. During the summer season there would be an increase in the extent of standing use conditions on New Bridge Street adjacent to the proposed development and areas of increased and decreased windiness on Fleet Street. In the vicinity of the Site, most areas would remain suitable for their intended use, as in Configuration 2, with the exception of the area at the junction of New Bridge Street and Queen Victoria Street, which would likely be due to the increased mass of the development at 30-34 New Bridge Street (New Bridge Street House).
317. As in Configuration 2 strong winds would be anticipated at the junction with Queen Victoria Street, to the south of the development at 30-34 New Bridge Street (New Bridge Street House). The extent of the affected area would be slightly greater than in the baseline scenario, however, is unlikely to be exacerbated by the proposed development, and mitigation measures would, therefore, not be required.

#### Private Terraces

*Configuration 2: Proposed Development with Existing Surrounding Buildings and*

*Configuration 3: Proposed Development with Cumulative Surrounding Buildings*

318. In Configuration 2, upper-level terraces on the proposed development would have wind conditions ranging from occasional sitting to walking use during the summer season. Walking use wind conditions would be two categories windier than suitable for amenity use and standing conditions one category too windy. strong winds would be anticipated to occur at the south-eastern corners of the 7th and 8th levels, and along the southern edge of the 9th level rooftop terrace. Therefore, mitigation measures would be required.

319. In Configuration 3, wind conditions on the terrace would remain as in Configuration 2 during the summer season. Strong winds would persist at the south-eastern corners of the 7th and 8th levels, and to the south of the rooftop terrace. Mitigation measures would be required.
320. The following mitigation measures are suggested on the terraces:
- Solid or approximately 50% porous balustrade surrounding terrace areas (typically 1.5m tall);
  - Planters with planting above, surrounding seating areas (typically 1.5m tall total height);
  - Solid or approximately 50% porous screening surrounding seating areas (typically 1.5m tall); and
  - Increasing the number of deciduous trees in proximity of seating areas (typically 2-3m tall).
321. A condition is recommended requiring further details of the mitigation measures on the terraces to ensure that any impacts are acceptable.

### **Thermal Comfort Assessment**

322. London Plan Policy D8 and D9 and Draft City Plan 2036 Policy S8 indicates that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings - wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Draft City Plan Strategic Policy S12 requires developers to take account of the potential microclimate and thermal comfort impacts from tall building development at an early stage in the design process. Draft City Plan Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.
323. In accordance with the City of London Thermal Comfort Guidelines a thermal comfort assessment has been prepared. The technique involves merging wind, sunlight, temperature and humidity microclimate data at a seasonal level to gain a holistic understanding of Thermal Comfort and



how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.

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

<b>Usage Category</b>	<b>% of hours with Acceptable UTCI</b>	<b>Description</b>
All Season	≥90% in each season	Appropriate for use all year round (e.g. parks)
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).
Short Term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round
Short Term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.
Transient	≤25% in winter OR ≤50% in any other season.	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).

325. The public street level and private terraces have been assessed for all hours in a year between 8:00 am and 8:00 pm (GMT), as specified by the City of London Thermal Comfort Guidelines. This analysis was conducted for the following three configurations:

- Configuration 1: Existing site with existing surrounding buildings (the baseline scenario);
- Configuration 2: Proposed development with existing surrounding buildings; and
- Configuration 3: Proposed development with cumulative surrounding buildings.

Configuration 1: Existing site with existing surrounding buildings (the baseline scenario)

326. At ground level, the majority of areas fall into the “all season” and “seasonal” thermal comfort categories. There are relatively small, isolated areas which fall into the “short term” category, notably south-east of the site, near the junction of New Bridge Street and Queen Victoria Street. These are likely to occur due to the wind, as opposed to solar exposure, with the prevailing south-westerly winds accelerating around the corners.

Configuration 2: Proposed development with existing surrounding buildings

327. With the proposed development in place, it is predicted that there would not be a significant change in outdoor thermal comfort, with the majority of areas falling into the “all season” and “seasonal” thermal comfort categories, with localised “short term” thermal comfort to the south-east of the site. Pedestrian thoroughfares and entrances are predicted to have thermal comfort conditions suitable for their intended use.
328. It is predicted that the proposed terraces would experience mainly “seasonal” thermal comfort, with smaller areas of “all season” conditions. small areas of short-term conditions were predicted at the more exposed corners. As these terraces are only accessible to occupants, this range of conditions would be deemed acceptable in terms of thermal comfort.

Configuration 3: Proposed development with cumulative surrounding buildings

329. At ground level with the introduction of nearby cumulative schemes, it is predicted that there would not be a significant change in outdoor thermal comfort in comparison to Configuration 2, with the majority of areas falling into the “all season” and “seasonal” thermal comfort categories, with localised “short term” thermal comfort to the south-east of the site. Pedestrian thoroughfares and entrances are predicted to have thermal comfort conditions suitable for their intended use.
330. The proposed terraces would not see a significant change in outdoor thermal comfort in comparison to Configuration 2.

Thermal Comfort Conclusion

331. It is considered that the thermal comfort in and around the site, would be acceptable in accordance London Plan Policy D8, Policy D9 and emerging City Plan policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

Noise and Vibration

332. The submitted Environmental Statement includes an assessment of the impact from noise and vibration on the surrounding area, including noise

and vibration from the enabling works, demolition and construction; noise from the proposed development during operation; and noise associated with increases in road traffic, which could be attributed to the development.

- 333. Generally, in City redevelopment schemes most noise and vibration issues occur during demolition and early construction phases. Noise and vibration mitigation, including control over working hours and types of equipment to be used, would be included in a Construction Management Plan to be approved by condition.
- 334. The proposed development includes mechanical plant which would be located at roof level. To ensure that noise from plant is adequately controlled and minimised conditions are required related to plant noise and vibration.
- 335. Deliveries would take place from Bridewell Passage. The development would therefore have a negligible impact in terms of noise associated with unloading.

#### **Air Quality**

- 336. 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.
- 337. The proposed building would use zero emissions technologies in the form of Air Source Heat Pumps and solar PV panels and therefore there would be no on-site emissions associated with heating and hot water provision. A single generator to be used for back up purposes only is proposed.
- 338. The additional traffic movements are considered to be below the screening criteria for dispersion modelling.
- 339. Both the transport and building emissions are considered to be air quality neutral. Conditions are recommended regarding alternatives to diesel generators, flue heights and the Non-Road Mobile Machinery Register.

### **Health Impact Assessment**

340. 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 applicant has submitted a HIA in conjunction with the revised scheme which has been based on the NHS Healthy Urban Development Unit criteria, with adaptations to take into account the particular circumstances of the City. Policy GG3 of the London Plan, and TfL's Healthy Streets Indicators are also relevant. The Assessment concludes that the development would contribute towards positive health outcomes.
341. The proposed development is expected to have an overall negligible effect during the construction phase and an overall minor to moderate positive effect once it is operational.
342. Any potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and S106 obligations. A condition is recommended requiring details of measures to prevent jumping or falling from the development.

### **Equality Impact**

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

343. When considering the proposed development, the Public Sector Equality Duty (PSED) requires City of London to consider how the determination of the application will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.
344. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:-
- eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under this Act;
  - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - foster good relations between persons who share a relevant protected characteristic and persons who do not share it
345. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

346. 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.
347. The application includes an Equalities Assessment that considers the eight categories of people with protected characteristics and has identified four key priority groups.
348. The construction phase of the development will create job opportunities for local people on site, and within the sector's supply chain and more widely. The assessment has identified an overall negligible impact on businesses, organisations and employees located on-site during the construction period. In addition the assessment has identified an overall minor beneficial impact related to local employment opportunities, but mostly negligible impacts related to local accessibility.
349. The completed development would incorporate higher levels of accessibility for people with a disability and/or long-term limiting illness. The impact will depend on the priority group considered with accessibility impacts on residents with a disability and/or long term limiting illness judged as moderate beneficial. The proposed development is expected to have a minor beneficial impact on crime reduction, access and movement as well as public realm.
350. It is considered that the submitted Equalities Assessment satisfactorily considers equalities issues.

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

351. 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")).
352. Insofar that the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate.
353. As set out above, it is the view of officers that there would be no infringement of Article 9 of the ECHR, and in particular there would no infringement of the freedom to manifest religion or belief in worship, teaching, practice and observance.

### **CIL and Planning Obligations**

354. 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.
355. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
356. On the 1<sup>st</sup> of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. 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).
357. CIL contributions and City of London Planning obligations are set out below.

#### **MCIL2**

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Forwarded to the Mayor</b>	<b>City's charge for administration and monitoring</b>
<b>MCIL2 payable</b>	£311,776	£299,305	£12,471

### City CIL and S106 Planning Obligations

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
<b>City CIL</b>	£125,835	£119,544	£6,292
<b>City Planning Obligations</b>			
Affordable Housing	£109,900	£108,801	£1,099
Local, Training, Skills and Job Brokerage	£65,940	£64,280	£659
Carbon Reduction Shortfall ( <i>as designed</i> ) <i>Not indexed</i>	£133,950	£133,950	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£50,000	£50,000	£0
S106 Monitoring Charge	£3,250	£0	£3,250
<b>Total liability in accordance with the City of London's policies</b>	<b>£304,925</b>	<b>£293,625</b>	<b>£11,300</b>

### City's Planning Obligations

358. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. 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 (*Highways Schedule of Condition Survey, site access, consents, licences etc*)
- Local Procurement Strategy
- Employment and Skills Plan (*Demolition / Construction*)
- Delivery and Servicing Management Plan (*including Consolidation*)

- Travel Plan (including Cycling Promotion Plan) or Cycling Promotion Plan
- Construction Monitoring Cost
- Carbon Offsetting
- 'Be Seen' Energy Performance Monitoring
- Section 278 Agreement (*CoL*)
- Section 278 Agreement (*Transport for London*)
- Public Routes (*Specification, Public Access & Management Plan*)
- Cultural Implementation Strategy or Cultural Plan
- Television Interference Survey
- Provision of affordable co-working space

359. 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.

360. The scope of the s278 agreement may include, but is not limited to:

- Relaying of footways adjacent to the site on New Bridge Street, Bride Lane and Bridewell Place
- Revised vehicular crossover on Bridwell Place
- New vehicular crossover on Bride Lane

#### Monitoring and Administrative Costs

361. 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.

362. 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.

#### Conclusion

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

364. 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

365. The proposed office accommodation supports the aims of Local Plan policy CS1 and the emerging City Plan policy S4 and would provide flexible office floorplates for workers which are designed to meet the needs of a wide range of potential occupiers, in accordance with Policy DM1.3 in the adopted Local Plan and Policy OF1 in the emerging City Plan.
366. 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 would improve the existing site condition. The proposals make an effective use of a limited land resource and enhance the buildings relationship with the adjacent public realm. The proposals optimise the sites capacity for growth, in conformity with City of London Local Plan Policies CS10, DM 10.1 and London Plan Policies D3 and D8.
367. Building heights in the area are generally not uniform, there is a subtle variation in building heights in the wider neighbourhood to the west, south and east. As a result, the proposed height and massing appears comfortable in context and is considered to be in accordance with City of London Local Plan Policies CS10 and London Plan Strategic Policy S8.
368. It is considered that the provision of a new public house would result in a new social, community and cultural facility on the site offering a comparable facility to the existing public house, alongside the office development. The Sui Generis Public House use would be re-provided with an enhanced active frontage and the proposals would, therefore, accord with policy HC7 of the London Plan and policy CV1 of the emerging City Plan 2036.
369. The architects have successfully integrated the pub façade with the contemporary elevations of the office accommodation above. The design and appearance of the proposed pub is considered to be exemplary, and clearly identifiable as a pub, and it would make a positive contribution to the Conservation Area.
370. There are no identified local non designated heritage assets which would be affected by the development. The existing office building is not considered to be a non-designated heritage asset. The existing pub

does make a positive contribution to the Conservation Area and has been assessed as to whether it is of sufficient individual heritage significance to be considered a non-designated heritage asset. It is considered it is not a non-designated heritage asset.

371. The proposal would preserve the character, appearance and heritage significance of the Fleet Street Conservation Area. The proposal, by way of impact on setting, would preserve the heritage significance of numerous heritage assets, and an appreciation of that significance. The proposal would accord with London Plan Policy HC1, Local Plan Policies CS 12, DM 12.1 and DM 12.2 and policies in the NPPF.
372. The proposals would be visible in some River Prospect Views but would not harm the characteristics or composition of these views. The St Paul's heights grid would be adhered to and views of St Paul's Cathedral would be protected. Views of St Bride's and its iconic Steeple would be preserved in local, ground level views in close proximity to the site, high level views and in the riparian river prospect views. The massing has been sculpted to protect views of St Bride's from New Bridge Street, where the chamfer on the upper floors of the southeast corner align with views of the Steeple. The proposals would be compliant with Local Plan Policy CS 13 and emerging City Plan Policy S13, and associated guidance in the Protected Views SPD.
373. Additional areas of Public Highway are to be dedicated on the New Bridge Street frontage of the site totalling 12.05sqm and this results in an overall net gain in Public Highway of 4.77sqm.
374. The impact of the proposed development on daylight and sunlight levels on the nearby properties would be negligible. It is considered that the thermal comfort in and around the site, would be acceptable in accordance London Plan Policy D8, Policy D9 and emerging City Plan policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London. Wind conditions at street level are unlikely to be exacerbated by the proposed development.
375. It is the view of officers that the proposal complies with the development plan when considered as a whole. Accordingly, the presumption in favour of sustainable development in paragraph 11 of the NPPF means that the proposed development should be approved without delay. The other important material considerations that exist in this case reinforce that presumption. Indeed, they are of such significance and should attract sufficient weight to justify the grant of planning permission even if a

different planning judgment was reached as to compliance with the plan overall.

376. Accordingly, Officers recommend planning permission should be granted subject to the conditions set out the attached schedule.

## **Background Papers**

### **Consultation responses**

#### *Internal*

Memo, Environmental Resilience Officer, 7<sup>th</sup> July 2022

Memo, District Surveyors, 22<sup>nd</sup> July 2022

Memo, Air Quality Officer, 26<sup>th</sup> July 2022

Memo, Environmental Health Officer, 8<sup>th</sup> August 2022

Memo, Lead Local Flood Authority, 15<sup>th</sup> August 2022

Memo, Lead Local Flood Authority, 15<sup>th</sup> September 2022

Memo, Air Quality Officer, 12<sup>th</sup> December July 2022

Memo, District Surveyors, 16<sup>th</sup> December 2022

Memo, Environmental Health Officer, 4<sup>th</sup> January 2023

#### *External*

Email, Heathrow Airport, 22<sup>nd</sup> July 2022

Email, NATS Safeguarding, 25<sup>th</sup> July 2022

Letter, Historic England, 29<sup>th</sup> July 2022

Email, London City Airport, 18<sup>th</sup> August 2022

Email, TfL, 2<sup>nd</sup> September 2022

Letter, City of London Conservation Area Advisory Committee, 8<sup>th</sup> September 2022

Letter, CAMRA, 4<sup>th</sup> October 2022

Email, Heathrow Airport, 5<sup>th</sup> December 2022

Email, NATS Safeguarding, 5<sup>th</sup> December 2022

Letter, London City Airport, 12<sup>th</sup> December 2022

Letter, Historic England, 15<sup>th</sup> December 2022

### **Representations**

Letter, Martha Grekos CC, 15<sup>th</sup> August 2022

Letter, Karen and David Perkins, 15<sup>th</sup> August 2022

Online representation, Malik Saleh, 15<sup>th</sup> August 2022

Online representation, Jason Reading, 15<sup>th</sup> August 2022

Online representation, Chris Holder, 15<sup>th</sup> August 2022

Online representation, Eileen Collie, 15<sup>th</sup> August 2022

Online representation, Richard Davies, 15<sup>th</sup> August 2022

Online representation, Lionel Stevenson, 15<sup>th</sup> August 2022

Online representation, Christopher Stevenson, 15<sup>th</sup> August 2022

Letter, Martha Grekos CC, 16<sup>th</sup> August 2022

Online representation, David Perkins, 16<sup>th</sup> August 2022

Online representation, Bonita Ince, 16<sup>th</sup> August 2022

Online representation, David Edgell, 16<sup>th</sup> August 2022

Online representation, Michael Kidd, 16<sup>th</sup> August 2022

Online representation, Julian Faber, 16<sup>th</sup> August 2022

Online representation, William Ince, 16<sup>th</sup> August 2022

Online representation, David Buckley, 16<sup>th</sup> August 2022

Online representation, Alan Oakley, 16<sup>th</sup> August 2022

Online representation, Digby Strong, 17<sup>th</sup> August 2022

Online representation, Peter Hart, 17<sup>th</sup> August 2022

Online representation, Lisa Hughes, 17<sup>th</sup> August 2022

Online representation, Jon Warren, 19<sup>th</sup> August 2022

Online representation, Jack Raison, 24<sup>th</sup> August 2022

Letter, Alison Lee, St Bride Foundation, 15<sup>th</sup> September 2022

Online representation, John Loder, 8<sup>th</sup> November 2022

#### Application Submission Documents

Daylight and Sunlight Report, prepared by TFT, dated 15<sup>th</sup> June 2022

Statement of Community Involvement, prepared by Lichfields, dated June 2022

Whole Life Carbon Assessment Revision 03, prepared by Hoare Lea, dated 20<sup>th</sup> June 2022

Acoustic Report Revision 03, prepared by Hoare Lea, dated 20<sup>th</sup> June 2022

Construction Management Plan (Demolition Phase) Third Version , prepared by WPS, dated 20<sup>th</sup> June 2022

Construction Management Plan (Construction Phase) Third Version , prepared by WPS, dated 20<sup>th</sup> June 2022

Air Quality Assessment Revision 03, prepared by Hoare Lea, dated 20<sup>th</sup> June 2022

Fire Statement Revision 03, prepared by Hoare Lea, dated 20<sup>th</sup> June 2022

Sustainable Development and Climate Change Report Version 05, prepared by Hoare Lea, dated 22<sup>nd</sup> June 2022

Energy Strategy Revision 04, prepared by Hoare Lea, dated 22<sup>nd</sup> June 2022

Security Need Assessment, Kabsec Consultancy, dated 22<sup>nd</sup> June 2022

Pedestrian Level Wind Microclimate Assessment Revision D, prepared by RWDI, dated 28<sup>th</sup> June 2022

Outdoor Thermal Comfort Assessment Revision C, prepared by RWDI, dated 28<sup>th</sup> June 2022

Archaeological Desk Based Assessment, prepared by MOLA, dated June 2022

Design and Access Statement, prepared by HOK International, dated June 2022

Cultural Plan, prepared by HOK International, dated June 2022

Health impact Assessment, prepared by Lichfields, dated June 2022

Equalities impact Assessment, prepared by Lichfields, dated June 2022

Ecology Assessment, prepared by Greengage, dated June 2022

Arboricultural Report, prepared by Greengage, dated June 2022

Operational Waste Management Strategy Version 1.0, prepared by Velocity, dated June 2022

Transport Assessment Version 2.1, prepared by Velocity, dated June 2022

Flood Risk Assessment, prepared by akt II, dated June 2022

Drainage Strategy Report, prepared by akt II, dated June 2022

St Pauls Heights Study, prepared by HOK International, dated July 2022

Obtrusive Light Statement, prepared by Hoare Lea, dated 5<sup>th</sup> July 2022

Townscape and Heritage Report, prepared by KM Heritage, dated August 2022

Flood Emergency Plan, prepared by akt II, dated August 2022

Air Quality Assessment, prepared by Hoare Lea, dated 2<sup>nd</sup> September 2022

Detailed Circular Economy Statement Revision 05, prepared by Hoare Lea, dated 3<sup>rd</sup> November 2022

Sustainability Whole Life Carbon Assessment Revision 04, prepared by Hoare Lea, dated 4<sup>th</sup>-9<sup>th</sup> November 2022

Fire Strategy Addendum, prepared by Hoare Lea, dated 17<sup>th</sup> November 2022

Planning Statement, prepared by Lichfields, dated November 2022

Reprovision Strategy, prepared by HOK International, dated November 2022

Design and Access Addendum, prepared by HOK International, dated November 2022

## **APPENDIX B**

### **Relevant London Plan Policies**

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

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

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

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

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

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

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

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



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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

networks as well as establishing new networks."

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

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

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

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

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

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

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

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

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

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

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

### **Relevant GLA Supplementary Planning Guidance (SPG):**

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

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

S1 Healthy and inclusive city

HL1 Inclusive buildings and spaces

HL2 Air quality

HL3 Noise and light pollution

HL4 Contaminated land and water quality

HL6 Public toilets

HL9 Health Impact Assessments

S2 Safe and Secure City

SA1 Crowded Places

SA3 Designing in security

HS3 Residential environment

S4 Offices

OF1 Office development

S5 Retailing

RE2 Retail links

S6 Culture, Visitors and the Night -time Economy  
CV2 Provision of Visitor Facilities  
CV5 Public Art  
S7 Smart Infrastructure and Utilities  
S8 Design  
DE1 Sustainability requirements  
DE2 New development  
DE3 Public realm  
DE5 Terraces and viewing galleries  
DE6 Shopfronts  
DE8 Daylight and sunlight  
DE9 Lighting  
S9 Vehicular transport and servicing  
VT1 The impacts of development on transport  
VT2 Freight and servicing  
VT3 Vehicle Parking  
S10 Active travel and healthy streets  
AT1 Pedestrian movement  
AT2 Active travel including cycling  
AT3 Cycle parking  
S11 Historic environment  
HE1 Managing change to heritage assets  
HE2 Ancient monuments and archaeology  
HE3 Setting of the Tower of London World Heritage Site  
S13 Protected Views  
S14 Open spaces and green infrastructure  
OS1 Protection and Provision of Open Spaces  
OS2 City greening  
OS3 Biodiversity  
OS4 Trees  
S15 Climate resilience and flood risk  
CR1 Overheating and Urban Heat Island effect

CR3 Sustainable drainage systems (SuDS)

S16 Circular economy and waste

CE1 Zero Waste City

S27 Planning contributions

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

Air Quality SPD (July 2017);

Archaeology and Development Guidance SPD (July 2017);

City Lighting Strategy (October 2018);

City Transport Strategy (May 2019);

City Waste Strategy 2013-2020 (January 2014);

Protected Views SPD (January 2012);

City of London's Wind Microclimate Guidelines (2019);

Planning Obligations SPD (July 2014);

Open Space Strategy (2016);

Office Use SPD (2015);

City Public Realm (2016);

Cultural Strategy 2018 – 2022 (2018).



## 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.

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

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

## ***CS2 Facilitate utilities infrastructure***

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

### ***DM2.1 Infrastructure provision***

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

routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

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

### ***CS3 Ensure security from crime/terrorism***

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

### ***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.

#### ***DM1.4 Temporary use of vacant offices***

- 1) To permit the temporary use of vacant office buildings and sites by other uses where such uses would not produce unacceptable amenity conflicts nor prejudice the eventual return of the site to office use.
- 2) To refuse the temporary replacement of vacant offices with housing where it would adversely affect the existing beneficial mix of commercial uses.

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

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

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

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

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

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

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

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

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

### ***DM12.1 Change affecting heritage assets***

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

### ***DM12.2 Development in conservation areas***

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

### ***DM12.4 Archaeology***

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

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

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

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

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

### ***DM15.2 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.

### ***DM15.5 Climate change resilience***

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

### ***DM15.6 Air quality***

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



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

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

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

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

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

### ***DM15.8 Contaminated land***

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.
5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

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

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

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

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

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as 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.

#### ***DM18.1 Development in Flood Risk Area***

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:

- a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
- b) the benefits of the development outweigh the flood risk to future occupants;
- c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.

2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:

- a) all sites within the City Flood Risk Area as shown on the Policies Map; and
- b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

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

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where

feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

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

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

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

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

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

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

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

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

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

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

### ***CS20 Improve retail facilities***

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

### ***DM20.1 Principal shopping centres***

1. Within Principal Shopping Centres (PSCs) the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Proposals for changes between retail uses within the PSC will be assessed against the following considerations:

- a) maintaining a clear predominance of A1 shopping frontage within PSCs, refusing changes of use where it would result in more than 2 in 5 consecutive premises not in A1 or A2 deposit taker use;
- b) the contribution the unit makes to the function and character of the PSC;
- c) the effect of the proposal on the area involved in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.

2. Proposals for the change of use from shop (A1) to financial and professional service (A2) restaurant and cafes (A3) drinking establishments (A4) or hot food takeaways (A5), use at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre.

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

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

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

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



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

## **SCHEDULE**

**APPLICATION: 22/00622/FULMAJ**

**8 - 12 New Bridge Street London EC4V 6AL**

**Partial demolition of Fleet House and full demolition of St Bride's Tavern Public house (retention of basement levels) and the erection of a part replacement building with roof extension to provide an 8 storey building for office use (Class E) at levels 1-8, with office lobby (Class E) and commercial space (Class E) at ground floor and mezzanine level, and public house (sui generis) at ground floor level and part basement level; new pedestrian and servicing route from St Brides Lane to Bridewell Place. (RECONSULTATION DUE TO ALTERATIONS TO THE DESCRIPTION OF DEVELOPMENT AND AMENDMENTS TO THE PROPOSED REPLACEMENT PUBLIC HOUSE).**

## **CONDITIONS**

- 1     The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
  
- 2     Prior to the commencement of the development, excluding demolition of the development a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the

development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.

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

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

REASON : To ensure that the GLA and the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2. 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.

- 4 Before any works including demolition are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a

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

- 5 Fencing for the protection of any retained tree 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.
- 6 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.
- 7 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 Page 3 of 5 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.

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

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction

- 9 No works except demolition to basement slab level shall take place until an update to the approved Circular Economy Strategy has been submitted to and approved in writing by the Local Planning Authority, to reaffirm the proposed strategy or demonstrate improvements, and that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved details throughout the lifecycle of the development.

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

- 10 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.

- 11 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.

- 12 Prior to construction an assessment of the provision of additional short stay cycle parking shall be submitted to and approved in writing by the Local Planning Authority. Any additional cycle parking shall be provided prior to first occupation in accordance with the approved details.

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.

- 13 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 10 l/s from each outfall and from no more than two distinct outfalls, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 60m<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.

- 14 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.

- 15 Before any construction works hereby permitted are begun details of rainwater harvesting and grey water recycling systems, to include details and locations of tanks and how the collected water will be used, shall be submitted to and approved in writing by the local planning authority.

REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 16 No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.

- 17 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented



and brought into operation before the development is occupied and shall be so maintained for the life of the building.

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 18 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 main office reception including any steps and ramp gradient, distance between security gates and wheelchair-accessible WC;
- (b) details of entrances;
- (c) details of ground floor facades;
- (d) details of north facade;
- (e) details of east facade;
- (f) details of south facade;
- (g) details of west facade;
- (h) details of a typical bay of all facades;
- (i) details of levels 9, 10 and 11 facades;
- (j) details of glazing and fenestration;
- (k) details of the Public House elevations;
- (l) details of the Public House signage;
- (m) details of public realm artwork on Bridewell Passage;
- (n) details of projecting signs;
- (o) details of soffits, hand rails and balustrades;
- (p) details of service vehicle and cycle store entrances;
- (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 natural ventilation to include location of opening vents and extent of natural ventilation in relation to floorspace;
- (v) 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.

- 19 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, to ensure a satisfactory external appearance, and to reduce the demand for energy 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.
- 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 Before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.

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

- 22 All hard and soft landscaping on the ground, on the building elevations, terraces and roofs shall be treated in accordance with a landscaping scheme to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced.

The scheme should include the following details:

(a) Irrigation, including provision for harvesting rainwater run-off from road ground and roof surfaces to supplement irrigation;

(b) Soil including details of the type and depths of soil and substrates;

(c) Species and selection of trees including details of its their age, growing habit, girth of trunk, how many times transplanted, root development and contribution to enhance biodiversity;

(d) Planting pit size and construction, tree guards;

(e) Details of all soft landscaping including species and contribution to enhance biodiversity;

(f) Seating;

(g) Paving materials;

(h) Details of features to enhance biodiversity; and

(h) maintenance plans for all proposed landscaping.

All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within 5 years of completion of the development shall be replaced with

trees and shrubs of similar size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.

REASON: In the interests of visual amenity and to achieve environmental benefits in accordance with the following policies of the Local Plan: DM10.1, DM10.2, DM10.3, DM10.4, DM19.1, DM19.2.

- 23 Notwithstanding the details shown on the drawings, before any works thereby affected are begun, details of measures to prevent jumping or falling from the development shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be in place prior to occupation and remain in situ for the lifetime of the development.

REASON: In the interests of safety in accordance with the following policies of the draft City Plan 2036: DE2 and DE5.

- 24 Details of the construction, planting irrigation and maintenance regime for the proposed green wall(s)/roof(s) shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.

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

- 25 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.

REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.

- 26 Archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of

such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological evaluation work.

REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.

- 27 No works except demolition to basement slab level shall take place before details of the foundation design and piling configuration, to include a detailed method statement, have been submitted to and approved in writing by the Local Planning Authority.  
REASON: In order to allow an opportunity for investigations to be made in an area where remains or archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.
- 28 (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.
- 29 A post construction BREEAM assessment demonstrating that a minimum target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve) 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.
- 30 Prior to occupation the detailed design of all wind mitigation measures shall be 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.

- 31 The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter. A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7

- 32 Before any new 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.

- 33 No cooking shall take place within any Sui Generis public house use hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission. REASON: In order to protect

the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

- 34 Once the building construction is completed and prior to the development being occupied (or, if earlier, prior to the development being handed over to a new owner or proposed occupier) a post-completion Circular Economy statement shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.  
REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the Publication London Plan.
- 35 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.
- 36 Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority . The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.  
REASON: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.

- 37 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.  
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.
- 38 Unless otherwise approved by the LPA no plant or telecommunications equipment shall be installed on the exterior of the building, including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.  
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 39 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.
- 40 The roof terraces on level 4, 7, 8 & 9 hereby permitted shall not be used or accessed between the hours of 2200 on one day and 0800 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.
- 41 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.
- 42 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.

- 43 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.

- 44 All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

REASON: Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

- 45 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 112 long stay pedal cycle spaces, and a minimum of 12 short stay pedal cycle spaces. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.

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

- 46 Unless otherwise agreed in writing by the Local Planning Authority a minimum of 12 showers and 87 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.

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

- 47 All ecological data gathered to support this application and gathered as part of ongoing monitoring to inform management, shall be submitted to the relevant Local Environmental Records Centre (LERC) currently Greenspace Information for Greater London ([www.gigl.org.uk](http://www.gigl.org.uk))

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

- 48 If applicable, at all times, the window cleaning gantries, cradles and other similar equipment, when not being used for cleaning or maintenance shall be garaged within the enclosure(s) shown on the approved drawings.

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

- 49 The plant enclosure shown in the drawings hereby approved shall be constructed and completed prior to first use and shall be retained thereafter as approved for the life of the plant it encloses.

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

- 50 The areas within the development shown on the approved drawings as office and retail use shall be used for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England)Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.2.

- 51 The development shall provide:

- 7212 sq.m GIA Office Use (Class E)
- 120 sq.m GIA Retail Use (Class E)
- 369 sq.m GIA Public House Use (Sui Generis)

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

- 52 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: Location plan and dwg nos. AFL-HOK-01-B2-D-T-1001, AFL-HOK-01-B1-D-T-1002 P02, AFL-HOK-01-00-D-T-1003 P02, AFL-HOK-01-M0-D-T-1004 P02, AFL-HOK-01-01-D-T-1005, AFL-HOK-01-02-D-T-1006, AFL-HOK-01-03-D-T-1007, AFL-HOK-01-04-D-T-1008, AFL-HOK-01-05-D-T-1009, AFL-HOK-01-06-D-T-1010, AFL-HOK-01-07-D-T-1011, AFL-HOK-01-08-D-T-1012 P02, AFL-HOK-01-RF-D-T-1013 P02, AFL-HOK-01-RF-D-T-1014, AFL-HOK-01-ZZ-D-T-3001 P02, AFL-HOK-01-ZZ-D-T-3002 P02, AFL-HOK-01-ZZ-D-T-3003 P02. AFL-HOK-01-ZZ-D-T-3004, AFL-HOK-01-ZZ-D-T-3009 P02, AFL-HOK-01-ZZ-D-T-3015, AFL-HOK-01-ZZ-D-T-3016, AFL-HOK-01-04-D-L-1002, AFL-HOK-01-07-D-L-1003, AFL-HOK-01-08-D-L-1004, AFL-HOK-01-RF-D-L-1005, AFL-HOK-01-ZZ-D-L-1006, AFL-HOK-01-ZZ-D-L-1007, AFL-HOK-01-ZZ-D-L-7001, AFL-HOK-01-ZZ-D-L-7002, AFL-HOK-01-ZZ-D-T-0110, AFL-HOK-01-ZZ-D-T-0111, AFL-HOK-01-ZZ-D-T-0112, AFL-HOK-01-ZZ-D-T-0113, AFL-HOK-01-ZZ-D-T-0114, AFL-HOK-01-ZZ-D-T-0115 and AFL-HOK-01-ZZ-D-T-0116.

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

## INFORMATIVES

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

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

a full pre application advice service has been offered;

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

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

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

Office 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.

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

- 4 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.