

Committee:	Date:
Planning Application Sub-Committee	20 March 2023
Subject: 85 Gracechurch Street London EC3V 0AA Partial demolition of existing building (Gracechurch Street frontage adapted) and the erection of a 32 storey (155.70m AOD) building plus basement levels including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); and Heritage Garden and Cultural Space at level 5 (sui generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.	Public
Ward: Langbourn	For Decision
Registered No: 22/01155/FULEIA	Registered on: 30 November 2022
Conservation Area: Leadenhall Market	Listed Building: No

Summary

Planning permission is sought for: Partial demolition of existing building (Gracechurch Street frontage adapted) and the erection of a 32 storey (155.70m AOD) building plus basement levels including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); and Heritage Garden and Cultural Space at level 5 (sui generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

An Environmental Statement accompanies the scheme.

The scheme is of a high-quality design and features a number of attractive features including greening and vehicle lifts which integrate into the landscaping. It provides a significant increase in office floorspace meeting one of the primary objectives of the City's Local plan and London plan policies.

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

The scheme delivers an increased and significant enhancement of public realm through the introduction of a new east-west public route through the building connecting Gracechurch Street to the network of passageways and lanes connecting Leadenhall Market and the introduction of a large permeable accessible Public Hall, fronting Gracechurch Street, open to the public 24 hours a day, except for servicing.

The scheme provides a varied range of retail spaces at ground floor, including the Public Hall fronting Gracechurch Street and a new permeable accessible space.

The scheme provides a Heritage Garden and cultural space at fifth floor level, totalling around 892sq.m of floorspace. The space will offer a Heritage Walkway which will provide new views over Leadenhall Market, revealing elements not currently available. Working with the Museum of London as a cultural content partner, the space would be available for the benefit of City workers, residents and visitors.

Over 35,000sq.m of flexible and sustainable Grade A office floorspace suitable for circa 2,210 City workers would be provided as part of the scheme. The proposed office floorplates are designed to be subdivided and arranged in a number of ways to accommodate a range of office occupiers.

505 long term bicycle spaces would be provided with associated shower and locker facilities and 114 short stay spaces would be provided. The scheme is in compliance with Local Plan Policy 16.3 and London Plan policy 6.9. The scheme includes an innovative solution of two service vehicle lifts within the building, the lids of which during the daytime would form part of the publicly accessible area and Public Hall fronting Gracechurch.

Representations objecting to the proposals have been received from Historic England on the grounds of, low to moderate, less than substantial harm to significance arising as result of: Loss of prominence and overshadowing to the Leadenhall Market (Grade II*), noting the impact to an existing appreciation of its roofscape. The materiality and form of the proposals was considered to be mannered and 'heavy', creating a distracting presence in views towards 81-82 Gracechurch Street (Grade II) and more generally creating a different scale of development within the Leadenhall Market Conservation Area. A similar impact upon views from the Bank Conservation Area was also noted.

Additionally, the appearance of the proposals behind the tower of the Chapel of St Peter Ad Vincula (Grade I) was considered to cause a minor impact of low, less than substantial harm to its significance. Finally, the impact on views from Cornhill to St Michael Cornhill (Grade I) was considered to cause harm,

falling within the middle of the range of less than substantial harm, through the appearance of the proposals seen in the backdrop of the Church tower.

Historic England does acknowledge however, the benefits of the scheme including the reinstatement of a historic route through the site and improvements to the existing ground floor facade. Both of these were considered to provide an enhancement to the Leadenhall Conservation Area.

5 further letters of objection have been received from residents of 2-4 Bulls Head Passage and Jamacia buildings, objecting on the grounds of loss of daylight and sunlight to these properties.

The proposal would preserve pan-London LVMF and local strategic views in accordance with London Plan Policy CS13(1), London Plan Policy HC4 and associated guidance in the LVMF SPG and Protected Views SPD. It would preserve the experience from those existing and emerging high-level views identified which are also important to the character of the City of London.

Following rigorous assessment, it is concluded that the proposal would not harm the attributes and their components and would preserve the Outstanding Universal Value and Significance, authenticity and integrity of the Tower of London World Heritage Site, in accordance with associated guidance in the WHS Management Plan, Local Setting Study and LVMF SPG.

The proposal would preserve the special interest and setting of Leadenhall Market , The Monument, St Peter Upon Cornhill , Lloyds Building , Nos. 12 & 14-19 Leadenhall Street, Southwark Cathedral , 81-82 Gracechurch Street, Former Ship Tavern, Lime Street, 7-9 Gracechurch Street, Cannon Street Towers , Former PLA Building , Lloyds Bank, 39 Threadneedle Street, Royal Exchange , 1 Cornhill , 13-14, 23-27, 28-30, 33-35, 39, 48 50 Cornhill and 15-22 Cornhill, 39-40 Lombard Street, St Paul's Cathedral , No. 37 & 39 Lime Street , 7 & 9, Bishopsgate and The Royal Bank of Scotland , 2a Eastcheap , 7-8 Philpot Lane, St Mary Woolnoth, Chapel Royal of St Peter ad Vincula. The significance of the Leadenhall Market and Eastcheap Conservation Areas would be unharmed, preserving and enhancing the character and appearance of the areas.

The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S106 Agreement.

Planning of the City Cluster has sought to safeguard the immediate setting of the Tower of London in accordance with guidance and to step the height of development away from the Tower so that it rises to a peak some way from the Tower. This scheme is located on the western side of the eastern cluster and it is considered that it sits comfortably within the Eastern Cluster policy area as well as the City Cluster policy area of the emerging Local Plan and its Renewal Opportunity Area.

In relation to other designated and non-designated heritage assets, it is considered that the proposed development would not harm their significance or setting.

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 to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City the heritage, design, eastern cluster and public realm policies, but fail to accord with the tall buildings policy. It is the view of officers that, as a matter of planning judgement, that as, in particular, the proposals make will make a significant contribution to advancing the strategic business objectives of the City and comply with relevant design, heritage, eastern cluster and public realm policies, they accord with the development plan when considered as a whole.

Paragraph 11 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up to date development plan without delay.

As set out in paragraph 199 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the conservation of a designated heritage asset (and the more important the asset, the greater the weight should be). The World Heritage Site status and its Grade I listing places the Tower of London at the very highest level and as a result great weight should be given to the asset's conservation.

Other material considerations, including the application of policies in the NPPF, in particular the outcome of the paragraph 202 NPPF balancing exercise, and the significant weight to be placed on the need to support economic growth (paragraph 81), also indicate that planning permission should be granted.

It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and taking into account all material planning considerations, it is recommended that planning permission be granted subject to all the relevant conditions being applied and Section 106 obligations being entered into in order to secure public benefits and minimise the impact of the proposal.

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) The application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008);
 - b) The application being referred to the Secretary of State pursuant to the Town and Country Planning (Consultation) Direction 2021 and the application not being called in under section 77 of the Town and Country Planning Act 1990;

2. That the Department for Digital, Culture, Media & Sport (DCMS) be notified of the application and advised that the City Corporation intends to grant planning permission and that the Planning and Development Director be given delegated authority to consider any response received from DCMS, UNESCO or ICOMOS.




3. That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 of the Town and Country Planning Act 1990 and any necessary agreement under Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed; and;

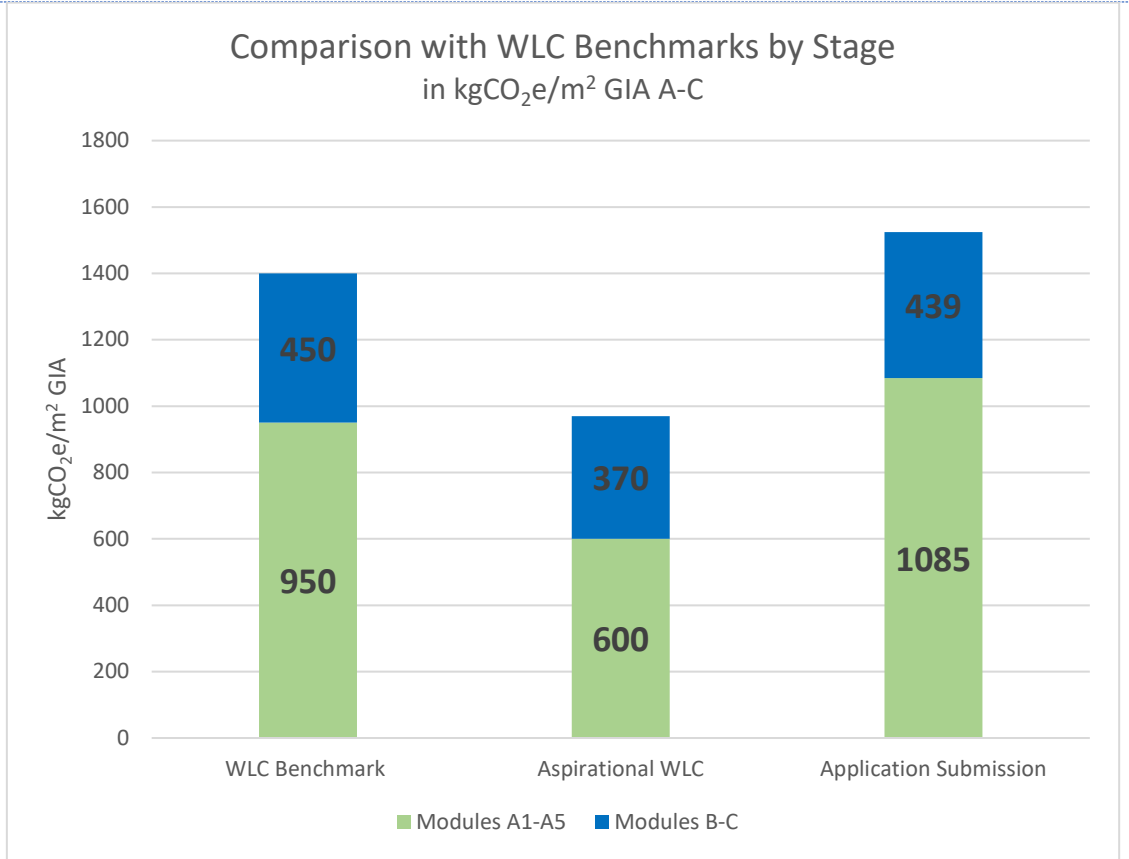
4. That your Officers be authorised to provide the information required by regulations 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

APPLICATION COVER SHEET

85 Gracechurch Street

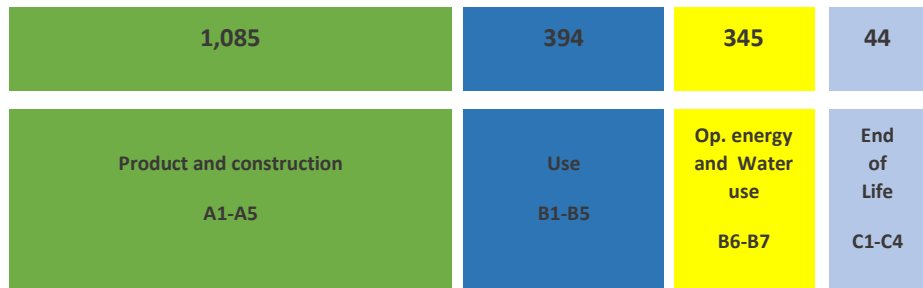
TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	57.666m AOD		155.700m AOD	
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Office	7,671sqm	Office	35,137sqm
	Retail	364sqm	Flexible Retail	580sqm
			Public Hall (<i>sui generis</i>)	928sqm
			Heritage Garden and Cultural Space (<i>sui generis</i>)	847sqm
	TOTAL	8,035sqm	TOTAL	37,492sqm
			TOTAL UPLIFT:	29,457sqm
3. OFFICE PROVISION IN THE CAZ	<p>At 31st March 2022, 1,261,000 sq.m net increase in office floorspace had either been delivered, was under construction or was permitted in the City.</p> <p>A further 739,000 sq.m net is required to meet the draft City Plan target of 2 million sq.m net by 2036.</p> <p>The proposed development would deliver nearly 4% of this remaining floorspace target.</p>			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	<ul style="list-style-type: none"> 445 – 615 FTE (estimated) 		<ul style="list-style-type: none"> 1,720 – 2,210 FTE (estimated) 	
5. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	0	Car parking spaces	0
	Cycle long stay		Cycle long stay	505 (compliant)
	Cycle short stay		Cycle short stay	114 (exceeds policy requirement)
	Lockers		Lockers	505
	Showers		Showers	53
	Changing facilities		Changing facilities	Yes
6. HIGHWAY LOSS / GAIN	None			
7. PUBLIC REALM	928sqm Public Hall at grade, including minimum 114sqm public routes open 24hrs a day at any given time, except for servicing.			
8. HERITAGE GARDEN	892sqm Heritage Garden would be open all year round (except Christmas Day, Boxing Day, New Year's Day if required) and during the hours of 10am to 7pm or nautical dusk whichever is the later.			

	The Applicant has entered into a Partnership Agreement with the Museum of London (MoL) for MoL to be the cultural content partner for the Level 5 Heritage Garden and Cultural Space.							
9. STREET TREES	EXISTING	PROPOSED						
	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> None 						
10. SERVICING VEHICLE TRIPS	EXISTING	PROPOSED						
	<ul style="list-style-type: none"> Estimated 17 trips per day 	<ul style="list-style-type: none"> 29 trips per day (off-site consolidation proposed) 						
11. SERVICING HOURS	The Public Hall would facilitate off street servicing during off peak hours from 23:00 – 07:00 via vehicle lifts that would pop out at night.							
12. VOLUME OF RETAINED FABRIC	 6 % / 227 tonnes							
13. OPERATIONAL CARBON EMISSION SAVINGS	<ul style="list-style-type: none"> Improvement against Part L 2013 using SAP 10 carbon factors (policy target 35% improvement)  42 %							
	<ul style="list-style-type: none"> Improvement against Part L 2021 using SAP 10 carbon factors (policy target 35% improvement)  17 %							
14. OPERATIONAL CARBON EMISSIONS	<table border="1" data-bbox="386 1377 1481 1496"> <tr> <td>214,329.00</td> <td>kgCO2e/annum (based on 37,492 GIA)</td> </tr> <tr> <td>5.72</td> <td>kgCO2e/m²_{GIA}/annum</td> </tr> <tr> <td>343.20</td> <td>kgCO2e/m²_{GIA} over 60 years</td> </tr> </table>		214,329.00	kgCO2e/annum (based on 37,492 GIA)	5.72	kgCO2e/m ² _{GIA} /annum	343.20	kgCO2e/m ² _{GIA} over 60 years
	214,329.00	kgCO2e/annum (based on 37,492 GIA)						
5.72	kgCO2e/m ² _{GIA} /annum							
343.20	kgCO2e/m ² _{GIA} over 60 years							
(values cover Module B6 from WLCA only and excludes the decarbonisation of the grid)								
15. EMBODIED CARBON EMISSIONS	PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS							




- TOTAL: 57,122,303 kgCO₂e/60 years A-C excl. B6 & B7

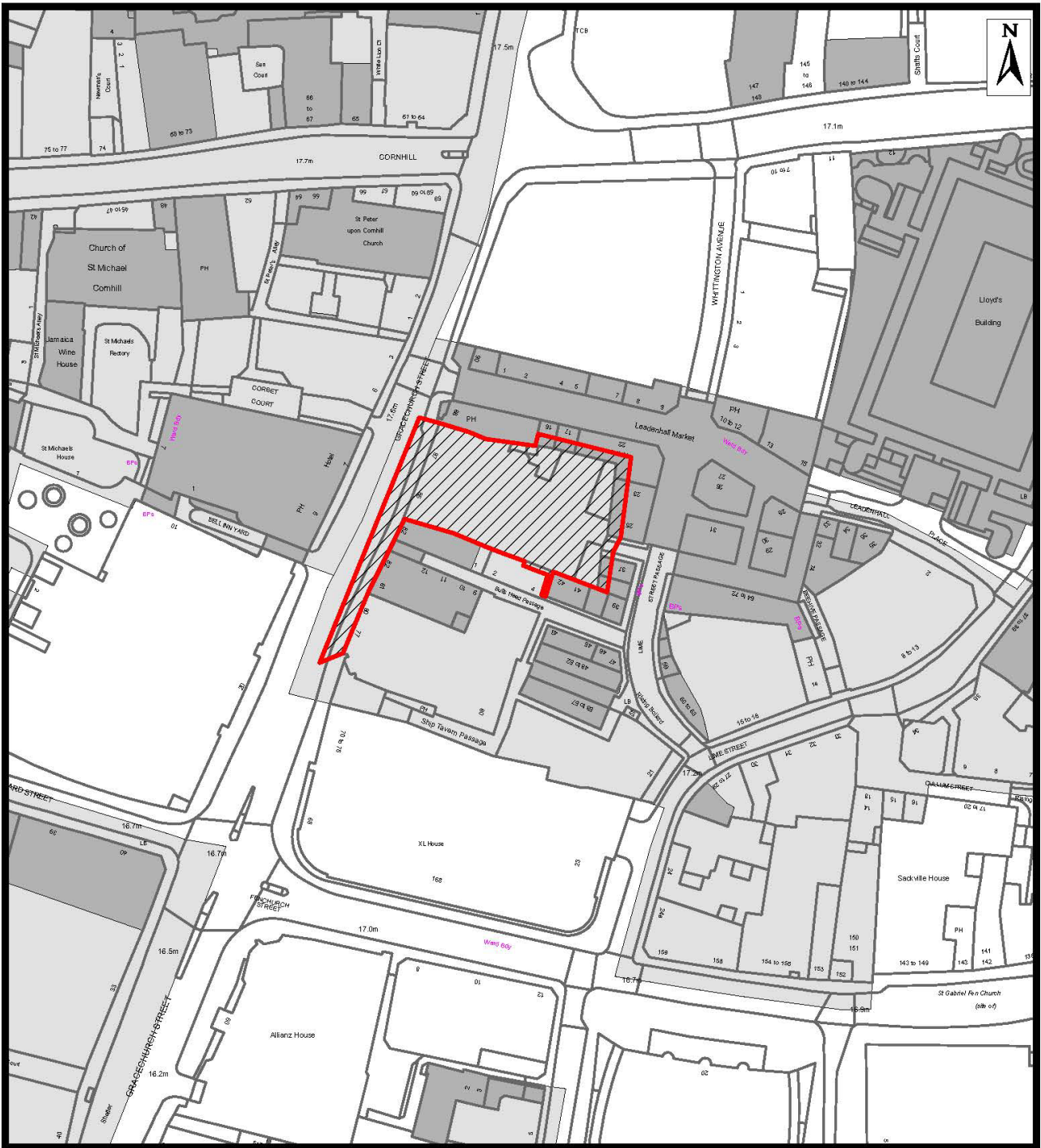
16. WHOLE LIFE CYCLE CARBON EMISSIONS (kgCo2e/m2 GIA)



- TOTAL: 70,072,272 kgCO₂e/60 years

17. WHOLE LIFE-CYCLE CARBON OPTIONS	Item	Option 1 – Existing Building	Option 2 – Major Refurbishment	Option 3 – Redevelopment
	Gross Internal Area (GIA)	8,589 m ²	13,777 m ²	37,492 m ²
	Increase in NIA	n/a	+4,050 m ²	+16,679 m ²
	Embodied Carbon (A1-A5)	46 kgCO ₂ e/m ² GIA	810 kgCO ₂ e/m ² GIA	1,085 kgCO ₂ e/m ² GIA
	% Material retained rel. to existing	94% 3,733 tonnes of material retained	63% 2,512 tonnes of material retained	6% 227 tonnes of material retained
	Embodied Carbon (A-C)	418 kgCO ₂ e/m ² GIA	1,236 kgCO ₂ e/m ² GIA	1,524 kgCO ₂ e/m ² GIA
	Operational Energy (B6) <small>Inc. grid decarb</small>	1,321 kgCO ₂ e/m ² GIA	240 kgCO ₂ e/m ² GIA	77 kgCO ₂ e/m ² GIA
	EPC Rating	D		A
	Fuel Source	Electricity (main)	100% Electric	100% Electric
	Total WLCA (Intensity) <small>Inc. grid decarb</small>	1,739 kgCO ₂ e/m ² GIA	1,476 kgCO ₂ e/m ² GIA	1,601 kgCO ₂ e/m ² GIA
	Total WLCA (tonnes)	14,936 tCO ₂ e A-C	20,335 tCO ₂ e A-C	60,025 tCO ₂ e A-C
	Total Energy (60 years)	185,522,400 kWh	90,928,200 kWh	94,458,480 kWh
18. TARGET BREEAM RATING	<ul style="list-style-type: none"> Outstanding 			
19. URBAN GREENING FACTOR	<ul style="list-style-type: none"> 0.92 (exceeds policy requirement, policy target 0.3) 			
20. AIR QUALITY	Air Quality Neutral (policy target AQN)			




Site Location Plan



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ADDRESS:
85 Gracechurch Street

CASE No.
22/01155/FULEIA

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



ENVIRONMENT DEPARTMENT





Main Report

Environmental Statement

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

4. Representations made by any body required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also form part of the environmental information to be examined and taken into account by your Committee.
5. The Environmental Statement is available online, together with the application, drawings, relevant policy documents and the representations received in respect of the application.
6. Additional environmental information was requested, published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The additional information (being further information and any other information) which forms part of the environmental information is also available online along with any further representations received in conjunction with the information.

Site and Surroundings

7. The site is located towards the northern end of Gracechurch Street, on the east side. It is bounded by Gracechurch Street to the west, the New Moon Public House and Leadenhall Market to the north, Bulls Head Passage to the south and Leadenhall Market to the east.
8. The red line boundary of the proposed development includes public realm proposals for improved and widening of footways on the south side of the eastern footway of Gracechurch Street.
9. The existing building was completed in 1934-35. It is 8 storeys high with 2 basements and comprises 364 sq.m (GIA) retail and 7,671 sq.m (GIA) offices (Total 8,035 sq.m)
10. Residential properties at: 4 Bulls Head passage lie to the south, at the Publican's Flat New Moon Public House to the north, Jamaica Buildings to the west and at 14 Lime Street to the east of the site.
11. The site is in the Leadenhall Market Conservation Area.
12. There are a number of designated heritage assets in the immediate vicinity of the site. These include:
 - Leadenhall Market Conservation Area
 - Leadenhall Market (grade II*)
 - St Michael Cornhill (grade I)
 - St Peter Upon Cornhill (grade I)
 - Lloyds Building (grade I)

- Nos. 12 & 14-19 Leadenhall Street (grade II)
 - Nos. 81-82 Gracechurch Street (grade II)
 - Former Ship Tavern, Lime Street (grade II)
 - Nos. 7-9 Gracechurch Street (grade II)
13. Other designated heritage assets in the wider setting include: Tower of London World Heritage Site incorporating the Chapel Royal of St Peter ad Vincula (grade I), The Monument (grade I), Southwark Cathedral (grade I), Cannon Street Towers (grade II), Former PLA Building (grade II*), Lloyds Bank, 39 Threadneedle Street (grade II), Royal Exchange (grade I), 1 Cornhill (grade II), 13-14, 23-27, 28-30, 33-35, 39, 48, 50 Cornhill (grade II) and 15-22 Cornhill (grade II*), 39-40 Lombard Street (grade II), St Paul's Cathedral (grade II), No. 37 & 39 Lime Street (grade II), 7 & 9 Bishopsgate and The Royal Bank of Scotland (grade II), 2a Eastcheap (grade II), 7-8 Philpot Lane (grade II*), St Mary Woolnoth (grade I), Bank Conservation Area.
14. Gracechurch Street forms part of the Transport for London Road Network for which Transport for London (TfL) is the Highway Authority.

Proposals

15. Planning permission is sought for:
- Partial demolition of the existing building (Gracechurch Street frontage retained and adapted) and the erection of a 32 storey (155.70m AOD) building plus 4 basement levels including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments (Sui Generis) and hot food takeaway); Public Hall (Sui Generis); and Heritage Garden and Cultural Space at level 5 (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.
16. The scheme provides 37,492 sq.m GIA floorspace, comprising:
- 35,137 sq.m of office floorspace;
 - 580 sq.m of flexible retail floorspace;
 - 928 sq.m Public Hall; and
 - 847 sq.m of Heritage Garden and Cultural floorspace.
17. The maximum height of the proposed development would be 155.70m AOD. The proposed development includes an adapted and retained façade acting as a visual 'base' podium building, with a tower constructed above it. The podium base building includes a passageway formed from the existing central portal entrance and would provide a new public route from Gracechurch Street into Leadenhall Market and on to Lime Street

Passage. The proposed development would predominantly be in office use, with a Public Hall at ground floor, a Heritage Garden and curated Cultural Space at Fifth floor level and areas of flexible retail use at ground, first and fifth floor levels.

18. The scheme provides a significant increase in office floorspace and an increase in retail floorspace on the site, with the aim of creating an open and permeable publicly accessible ground floor with a variety of retail uses, with flexible Grade A office floorspace above.
19. The main entrances would be from Gracechurch Street and Lime Street Passage. The rear entrance from Lime Street Passage would provide a feature in the streetscape with an entrance formed from a barrel vault in brickwork, externally faced with a composite of overlapping masonry arches.
20. The ground floor is principally a publicly accessible space, with the Public Hall comprising the majority of the floorplate. The Public Hall is generous in scale with arched columns and balconies and the intent is that this space would be publicly accessible at all hours, providing a permanent new 24-7 east to west route.
21. The Public Hall would be flexible in its use, it is designed to be a complimentary extension to Leadenhall Market, providing civic, event and market space to be used for food kiosks, market stalls and cultural activities such as live music, dance, film screening and exhibitions. It has been designed to be as flexible as possible with free to use seating acting as a public dining room for the area and occupiers.
22. The Public Hall would facilitate off-street servicing during off-peak hours from 23:00 – 07:00 via vehicle lifts that would pop out at night. The vehicle lifts would provide a multifunctional useable floorspace during the daytime as they would be flush to ground floor level. The Public Hall is intended to be publicly accessible at all hours, although when the servicing lifts are in operation the western part of the ground floor would not be accessible for safety reasons.
23. At ground floor level, three varied flexible retail spaces would be provided access via the Public Hall. The office entrance is located to the southwest of the site and the lobby for the offices is located at second floor, accessed via escalators or lifts.
24. The Heritage Garden at level 5, would be accessed via public lifts within the Public Hall and occupies the entire fifth floor. The Heritage Garden comprises a woodland terrace, wellness garden and a Heritage Walkway which provides a circular walking route around the east side of the terrace

including a cantilevered section providing unique and new views of Leadenhall Market roof, the Lloyd's Building and the rest of the Cluster

25. The Applicant has entered into a Partnership Agreement with the Museum of London (MoL) for them to be the cultural content partner for the Level 5 Heritage Garden and Cultural Space. The space would be a unique space for visitors to appreciate the Roman History of the site, including through display artefacts which have been excavated from the site of the Roman Forum and currently stored in archives. There would also be opportunities for a Virtual Reality experience. A Cultural Implementation Strategy would be secured via the S.106 Agreement which allows flexibility in the cultural offer of level 5 and scope for any significant archaeological findings at basement level to be incorporated into the cultural experience and offer of the proposed development.
26. The proposed scheme would incorporate extensive urban greening, including large, planted terraces at fifth floor and balcony planters located on all floors and would incorporate the planting of trees in the Heritage Garden.
27. Off street servicing would take place from the basements, accessed via Gracechurch Street out of hours by two flatbed vehicle lifts which during the daytime would form part of the publicly accessible Public Hall. This innovative solution removes any dead frontage and ground floor space often experienced with service yard entrances.
28. The development would have four basement levels and the existing basement would be reused insofar as possible. The final basement configuration and size is reserved by condition subject to an Archaeological scheme of investigation and works to establish the extent of any nationally significant Archaeological findings.
29. Basement level 1 would contain facilities for security, water intake, rainwater harvesting, a space to allow a future connection to the district heating network, UK Power networks (UKPN) connection and other plant areas. It would contain a loading bay area to allow for deliveries and will have future allowance for kitchen space for the proposed retail units at ground floor. All basement configurations are subject to a final layout which would be secured by condition following a written scheme of investigation in relation to Archaeology.
30. Basement level 2 would contain waste and bin stores, a loading bay, storage space, short stay cycle parking and various plant areas.

31. Basement level 3, would contain a range of cycle and associated shower facilities, including cycle lifts, long- and short-stay bike stands, lockers, towel services, drying room and a bike workshop and repair room.
32. Basement level 4 would contain the back of house operational facilities such as a greywater harvesting tank, sprinkler tanks, pump rooms, a diesel store for the life-safety generators and a mobile network solution room. It also contains space for the ground source heat pump plant.
33. Public Realm improvement works are proposed to benefit the pedestrian environment along Gracechurch Street which includes footway widening to improve pedestrian comfort levels, these would be delivered via a S.278 agreement. Additionally, the footway that connects the proposed development to Lime Street Passage is also proposed for improvement works.

Consultations

Statement of Community Involvement

34. The Applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders including: a traditional public exhibition held on 4th October 2022, a newsletter posted to 1,186 addresses, a bespoke consultation website (www.85gracechurchconsultation.co.uk), door-knocking exercise and Member engagement.
35. The Public Exhibition was held at Unit 13 – 15 in Leadenhall Market and in total 72 people attended the public exhibition. A QR code was provided to visitors to provide feedback on the proposals which was linked to the Typeform survey. The website went live on 27th September and had a total of 1,989 visits.
36. In summary, discussions with stakeholders, businesses and neighbours have been broadly positive, welcoming the Applicant's commitment to a new public hall on the ground floor as a means to help support Leadenhall Market as a 7-day a week destination. Consultees also welcomed the improved sustainability credentials, the urban greening, and the provision of a publicly accessible fifth floor heritage garden as part of a destination cultural offer.
37. Whilst the majority of consultees supported the proposals for the site and principles, concerns were raised regarding the impact of the proposed height on directly neighbouring residential properties and the need for a carefully managed programme of works to overcome the potential impact of the construction phase on residential amenity and trade.

Statutory Consultation

38. Following receipt of the application, it has been advertised on site and in the press and has been consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Copies of all received letter and e-mails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the table below.
39. The applicant has provided detailed responses to matters raised in consultee and third-party responses. The applicant’s responses are attached in full and appended to this report.

Consultation responses	
Historic England	<p>Historic England objects to the application proposals on the basis it considers harm would be caused to conservation areas and listed buildings, and the clear conflict with the Development Plan, given that it considers there is no policy support for a tall building in this location. It raises concerns in relation what is considered minor harm to the Tower of London World Heritage Site.</p> <p>Historic England state that because the proposal has the potential to harm the Outstanding Universal Value of World Heritage Site, we also encourage you to notify the State Party (DCMS) of this proposal. DCMS will then make a decision on whether to notify the World Heritage Centre.</p> <p>Historic England’s position is as follows:</p> <p>The proposals would result in harm to the significance of Leadenhall Market, its associated conservation area, and the Bank Conservation Area. Together, these heritage assets contribute to a rich historic place. In each case the harm would be less than substantial in the language of the NPPF, and low to moderate in the range of such harm. An impact to the Tower of London World Heritage Site is considered minor, and the harm would be low in the range of less than substantial harm.</p> <p>In the case of the Church of St Michael Cornhill, it found that the harm would be greater. For the purposes of the NPPF it categorises this harm as falling in the middle of the range of less than substantial harm because the tower and the ability to appreciate it in its setting are key elements of its significance. The harm is heightened because the impact is to arguably the best available views</p>

of the church tower (in terms of appreciating its architectural purpose) and because the ability to appreciate significance from such vantage points would, as a consequence of this proposal, be profoundly changed. The impact is notably exacerbated by the proposed masonry cladding and busy facades that were described.

It is disappointing that the exceptional significance of St Michael's Cornhill (as a Grade I listed building) appears not to have informed the broad development parameters and detailed design of the scheme. This makes it contrary to the regional and national policies, and design guidance, set out above, which require heritage considerations to be taken into account, early in the process, to ensure that harm is avoided. Consequently, we find that the design quality is therefore poor in this context.

All harm attracts great weight and requires clear and convincing justification. Given that the site is not allocated for a tall building, and Local Plan policy indicates that it is not suitable for such a development, the decision maker would need to be persuaded that there is very good reason for it.

Whilst it is important to judge this scheme on its merits, such a departure from policy would also represent a concerning precedent and raises difficult questions about the purpose of this conservation area designation. The boundary of the conservation area is drawn largely on the basis of traditional building heights and forms in a well-preserved area of historic townscape around the market. The conservation area appraisal SPD notes that the market's relationship with tall buildings outside its boundaries 'is only one characteristic of its setting and that lower-rise modern buildings in the vicinity mitigate the impact of these and provide variety on the local skyline.' Permitting a tall modern building within the boundary would therefore appear to defeat a core purpose of the designation.

We recognise that there are some heritage benefits arising from the scheme. However, those put forward appear modest in the context of the development as a whole and compared to the harm, should they be delivered.

It acknowledged the City's position of seeking publicly accessible spaces in the Eastern Cluster, but can only support them where they would not harm the City's historic environment. Given the weight that harm attracts, heritage benefits that arise directly at the expense of the historic

	<p>environment cannot represent a persuasive justification.</p> <p>Since our pre-application advice, further work has been done to clarify the economic benefits of the proposals, including for Leadenhall Market in particular. It recognised that an additional public space and improved circulation could have a complementary function, but remained of the view that the evidence presented does not demonstrate that the future success of the historic market depends on them. It would appear that some of the identified failings of the market could be resolved without any such extension, and should not be dependent on this scheme, or the disproportionate harm that it would cause.</p> <p>The response relates to designated heritage assets only. However, it understood that the proposals would harm highly significant archaeology at the heart of the Roman City. The Greater London Archaeological Advisory Service is assessing this impact and will be providing further detailed advice on this matter, as specialist archaeological adviser to the local planning authority.</p> <p>Having regard to national, strategic and local policies, while Historic England recognise the opportunities for public, economic and heritage benefits, which include Leadenhall Market in particular, they state that the proposals would result in harm to the significance of Leadenhall Market, associated conservation area and the bank conservation area and objects to the application.</p> <p>Response to comments: consideration of the impacts identified in Historic England’s response are contained in the following sections of this report: Design and Heritage, Principle of a Tall Building, Tall Building – Impacts, Strategic Views, Designated Heritage Assets, Leadenhall Market Conservation Area, Bank Conservation Area and 85 Gracechurch Street and Principle of Redevelopment.</p>
<p>GLAAS, Historic England Archaeology</p>	<p>GLAAS welcome the provision of a dedicated exhibition space in conjunction with MOLA and the Museum of London. They however state they are in agreement with the findings of the Environmental Statement, which considers the archaeological impact of the scheme to be ‘major adverse’. This is due to the site’s proximity to the buried remains of the first century AD Roman forum and basilica, and the removal of a portion of these remains where they fall within the proposed basement footprint.</p> <p>GLAAS notes that while the Roman forum-basilica complex has not yet been formally assessed for</p>

	<p>designation, they recommend that it be recognised as heritage asset of archaeological and historical interest, parts of which could be of equivalent significance to a scheduled monument. They acknowledge however that a fully informed judgement on significance and impact can only be achieved by archaeological investigation.</p> <p>An ‘Alternative Basement Concept’ was therefore prepared which includes provisions for the preservation and presentation of suitable remains, if identified. GLAAS welcomed this option, considering it to reduce the archaeological impact of the development, and increasing the heritage-related public benefit.</p> <p>They recommended piling method, basement design, layout, foundations and scale should be controlled and reviewed following completion of archaeological investigation.</p> <p>In the terms of the NPPF, without the provision for public access to and interpretation of in-situ remains, GLAAS consider the public benefits of the scheme to be insufficient to compensate for the harm arising. They therefore recommend the scheme to be amended according to the prepared ‘Alternative Basement Concept’, reducing the basement footprint by a third at levels –2 and below, and allowing for public access to view in-situ remains with appropriate interpretation and conservation. They have therefore recommended conditions accordingly.</p>
The Greater London Authority	<p>The GLA state that overall, the principle of the redevelopment of the site for improved office, retail and cultural floorspace is accepted in principle.</p> <p>The GLA state that London Plan policies on CAZ uses, offices, urban design, heritage, strategic views, environment and transport are relevant to this application and state the following:</p> <p>Land Use Principle: The development’s contribution to the wider strategic functions of the CAZ, with the delivery of new high quality office floorspace (including affordable and retail floorspace), new cultural floorspace and enhanced public realm accords with the London Plan.</p> <p>Urban Design, Heritage and Views: In terms of design, although the new building may be of a high architectural quality and will improve public realm, GLA officers consider that proposal will have a less than substantial impact upon a number of heritage assets. Such harm must be</p>

	<p>outweighed by public benefits in order for the scheme to be supported.</p> <p>Transport: The proposal has yet to fully comply with London Plan transport policies. Further work on the proposed footway widening, cycle parking, contribution toward enhancing cycle hire service, local public realm/ walking/ cycling/ access improvements should be secured. Management plans should also be secured. A s177 over-sailing licence application will be required.</p> <p>Sustainability and Environment: Additional clarification is required with regards to energy commitments and requirements. Overall, and subject to securing appropriate conditions, the proposal is not likely to raise any noteworthy environmental concerns.</p> <p>Response to comments: The applicant has responded to the GLA's request for clarifications and additional material in an email addressing points on sustainability and by the submission of a technical note on transport issues and a clarifications report in relation to heritage assets.</p> <p>An officer assessment of the points raised and consideration of the impacts identified in The Greater London Authority's response are contained in the following sections of this report: Design and Heritage, Principle of a Tall Building, Tall Building – Impacts, Strategic Views, Sustainability and Highways</p>
Transport for London	<p>Transport for London confirms that the proposed cycle parking, trip generation, impact on the transport network, vehicle access and delivery and servicing details are acceptable.</p> <p>Transport for London have secured contribution towards a Cycle Hire docking station to provide service level enhancements of £90k.</p> <p>TfL have raised matters which have been secured by condition, which include undertaking a stage 1 road safety audit in relation to the proposed footway widening, entering into and securing a S.106 and S.278 agreement, submission of cycle parking details, a DSP, CLP and servicing hours.</p>
London Underground	No comments

<p>Victorian Society</p>	<p>The Victorian Society objects to the proposals.</p> <p>The Victorian Society state that:</p> <p>Constructing the proposed 32-storey building in this location would cause unwarranted significant harm to the Grade II* listed Leadenhall Market and significant harm to the Leadenhall Market Conservation Area in which it would be sited.</p> <p>The scale of the proposed building would mirror the 35 storeys of 1 Leadenhall Street, directly to the north of Leadenhall Market, effectively creating a narrow gulley, depriving the western entrance of the market building of natural light, diminishing the interior visibility and attractiveness from Gracechurch Street. The combined proximity and scale of these buildings shows a staggering lack of deference to the significance of a grade II* listed building, dwarfing, overshadowing and separating the western entrance from its wider historic urban form along Gracechurch Street.</p> <p>The proposal would also cause substantial harm to the Leadenhall Market Conservation Area by introducing a scale of development alien to the character of the Conservation Area, 'where the predominant scale of buildings, streets and spaces contrasts greatly with those in its immediate setting', thus damaging one of the key aspects of its significance. It would overwhelm the existing pattern of four to six storey office buildings, and the proposal would effectively enclose the domestically scaled western entrance of Leadenhall Market. The impact of this scale would also affect the views within the Bank Conservation Area, noted in its appraisal for architectural quality, tight medieval street patterns, small churchyards and nationally important buildings. The proposed building seeks to respond to the scale and character of the skyscrapers to the north - a scale inappropriate to this Conservation Area.</p> <p>The face of the City is rapidly changing, towers spring from many corners. The designation of the Leadenhall Market Conservation area was designed to protect what is special, important and unique about this part of the City; the construction of 85 Gracechurch Street would actively erode this.</p> <p>Most worryingly is the far-reaching precedent that this building could set, in terms of the protection afforded to Conservation Areas and the harm this would cause to the City in the long term. The cumulative impact of similar</p>
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	<p>development over time would irreversibly alter the character of the City and its significance viewed from the River Thames. There is a danger the City will become a monoculture of glass towers, its conservation areas and heritage assets diminished and disrespected. Granting permission would also show a wilful disregard for NPPF guidance and it begs the question: What is the purpose of a conservation area within the City? If what is special, unique and important is actively not protected?</p> <p>Although, in principle, we support the ‘Destination City’ and the Eastern Cluster’s vision to make Leadenhall Market a 7-day destination and to ‘reaffirm this quarter [Leadenhall Market] as the principal retail and cultural destination within the Cluster’, we are sceptical of the aspirational claims that the proposal would ‘create a truly compelling public offer’, considering the proximity of popular food and retail offers from Old Spitalfields and Borough Market, in addition to the numerous rooftop gardens already in existence.</p> <p>The application goes onto lament the current rate of empty units and limited dwell time within the Market, claiming that the proposed new public hall would lead to the ‘rejuvenation’ of Leadenhall Market. We believe that the Market building as it currently stands is arguably already a thriving destination and could itself provide the basis for further rejuvenation. The current rate of empty units provides an opportunity to diversify the current offer. Further changes in the public realm and advertisement could increase dwell time. The proposed building could provide some slight commercial benefit to the Market, but the harm to the setting of the listed building and Conservation Areas, as described above, would not outweigh the modest commercial benefits. The proposal is not essential to the reaffirmation of Leadenhall Market as a principal cultural destination.</p> <p>Policy 7.7 of the London Plan states that “the impact of tall buildings proposed in sensitive locations should be given particular consideration. Such areas might include conservation areas, listed buildings, and their settings...” Paragraph 199 of the NPPF states that “great weight should be given to the asset’s conservation”, including the setting of heritage assets. The construction of this building would cause great, and unjustified, harm to a number of heritage assets, including those nationally recognised and those designated to protect the City’s heritage. The principle of such a tall building in this location is therefore</p>
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	<p>insupportable. We urge your authority to refuse consent for a scheme which would cause irreversible harm.</p> <p>Response to comments: consideration of the impacts identified in the Victorian Society’s response are contained in the following sections of this report: Design and Heritage, Principle of a Tall Building, Tall Building – Impacts, Strategic Views, Leadenhall Market Conservation Area and 85 Gracechurch Street, Principle of Redevelopment.</p>
<p>City of London Conservation Area Advisory Committee</p>	<p>The City of London Conservation Area Advisory Committee had the following comments to make:</p> <p>The City’s Conservation Area Advisory Committee considered this application at its meeting on 5 January 2023. We thank the officers for their detailed presentation and answers to our questions. We decided to object to the application.</p> <p>On 28 July 2022 there had been a pre-application presentation of the proposals to the Committee and my predecessor as Chairman wrote to you on 5 September 2022 expressing the Committee’s objections. There has been no significant change in the proposals since that meeting and the Committee continues its opposition to them.</p> <p>Our views are based on support for the City’s policy that tall buildings are inappropriate in Conservation Areas. This proposal represents significant overdevelopment of a constrained and sensitive site, with inappropriate detailing such as excessive greening and areas of blank wall. There would be a substantial loss of character in the Leadenhall Market Conservation Area and damage to the setting of nearby listed buildings.</p> <p>The Committee accepted that there may be benefits to Leadenhall Market and the area more generally in increasing the public realm and making provision for heritage display and interpretation on this site but was unanimous in its view that these benefits did not outweigh the serious damage to the character and appearance of the conservation area that would result from</p> <p>Response to comments: consideration of the impacts identified in the City of London Conservation Area Advisory Committees response is contained in the following sections of this report: Design and Heritage, Principle of a Tall Building, Tall Building – Impacts, Strategic Views,</p>

	Leadenhall Market Conservation Area and 85 Gracechurch Street, Principle of Redevelopment.
Historic Royal Palaces	No comments received
Thames Water	<p>Thames Water have identified capacity in the water network and are working with the applicant to ensure the development doesn't outpace the delivery of essential infrastructure.</p> <p>Thames Water have raised no objections and have proposed conditions to be included.</p>
Environment Agency	No comments
Natural England	No objection
Lead Local Floor Authority	Conditions are recommended requiring details to ensure that sustainability, flood risk reduction and water runoff rates are improved.
London City Airport	<p>The proposals do not conflict with current safeguarding criteria and so there is no objection.</p> <p>A condition has been proposed in relation to a construction methodology and cranes to safeguard aviation safety.</p>
Heathrow Airport	The proposals do not conflict with current safeguarding criteria and so there is no objection.
National Air Traffic Services (NATS)	The proposals do not conflict with current safeguarding criteria and so there is no objection.
London Borough of Tower Hamlets	No comments received
City of Westminster	Does not wish to comment on the proposal.
London Borough of Hackney	No objection
London Borough of Islington	No comments received

London Borough of Southwark	No comments received
London Borough of Camden	No comments received.
Royal Borough of Greenwich	No objection

Letters of Representation

Objections

Letters of representation – 6 letters of objection received from the owners/occupiers of 3 surrounding sites	
Owner and resident of Flat A, 4 Bulls Head Passage	<p>A resident and owner of Flat A, 4 Bulls Head Passage has submitted an objection and objects on the following grounds:</p> <ul style="list-style-type: none"> • Impacts on wellbeing, mental and physical health and that of neighbours and the impacts may be so unbearable as to render the properties uninhabitable. • The shared party wall element which would block the windows, light and ventilation to one side and would change the nature and character drastically with no consideration being given to the impacts. • The financial value, character and saleability is likely to be severely impaired. • The owner of the site has made no attempt to address concerns and the submitted documents don't acknowledge the existence of residential neighbours or the impact of the development on residents. <p>Response to Comment: Consideration of these impacts are contained in the following sections later in the report: Noise and Vibration, Health Impact Assessment, Air quality and Daylight, Sunlight, Overshadowing.</p>
Owner of Flat B, 4 Bulls	A owner of Flat B, 4 Bulls Head Passage has submitted an objection and objects on the following grounds:

<p>Head Passage</p>	<ul style="list-style-type: none"> • Impacts on wellbeing, mental and physical health and that of neighbours and the impacts may be so unbearable as to render the properties uninhabitable. • The shared party wall element which would block the windows, light and ventilation to one side and would change the nature and character drastically with no consideration being given to the impacts. • The financial value, character and saleability is likely to be severely impaired. • The owner of the site has made no attempt to address concerns and the submitted documents don't acknowledge the existence of residential neighbours or the impact of the development on residents. <p>Response to Comment: Consideration of these impacts are contained in the following sections later in the report: Noise and Vibration, Health Impact Assessment, Air quality and Daylight, Sunlight, Overshadowing.</p>
<p>Owner and resident of Flat C, 4 Bulls Head Passage</p>	<p>A resident and owner of Flat C, 4 Bulls Head Passage has submitted an objection and objects on the following grounds:</p> <ul style="list-style-type: none"> • Impacts on wellbeing, mental and physical health and that of neighbours and the impacts may be so unbearable as to render the properties uninhabitable. • The shared party wall element which would block the windows, light and ventilation to one side and would change the nature and character drastically with no consideration being given to the impacts. • The financial value, character and saleability is likely to be severely impaired. • The owner of the site has made no attempt to address concerns and the submitted documents don't acknowledge the existence of residential neighbours or the impact of the development on residents. <p>Response to Comment: Consideration of these impacts are contained in the following sections later in the report:</p>

	Noise and Vibration, Health Impact Assessment, Air quality and Daylight, Sunlight, Overshadowing.
Resident of Jamaica Buildings, St Michael's Alley	<p>A resident and owner of Jamaica Buildings St Michael's Alley has submitted an objection and objects on the following grounds:</p> <ul style="list-style-type: none"> • The development would affect daylight even more directly than other developments both existing and under development. These include the adjacent development at One Leadenhall. • Concerned that another substantial development within this dense grouping on Gracechurch Street and the 'Eastern Cluster' will put further strain on the utilities and facilities in the immediate area resulting in further digging up of the roads and resultant disturbance together with air pollution. • For the last two years we have suffered from the City of London permitting 24 hour working at 8 Bishopsgate. The contractor has repeatedly failed to meet noise limitations giving us sleepless nights. The COL seems unable to impose penalties or withdraw the permission. This development at 85 Gracechurch Street is even closer. <p>Response to Comment: Consideration of these impacts are contained in the following sections later in the report: Noise and Vibration, Health Impact Assessment, Air quality and Daylight, Sunlight, Overshadowing.</p>
Freeholder of 2-4 Bulls Head Passage	<p>The Freeholder of 2-4 Bulls Head Passage has submitted an objection and objects on the following grounds:</p> <ul style="list-style-type: none"> ☐ It is against the planning guidelines for the area and will have an enormous impact on both Leadenhall Market, a nationally important Grade 1 listed building, and our property which is part of a conservation area ☐ The impact on right to light of our property 2-4 Bulls Head Passage is enormous and way beyond the planning guidelines (this is the opinion of our advisors Delva Patman) <p>Response to Comment: Consideration of these impacts are contained in the following sections later in the report: Design and Heritage, Leadenhall Market Conservation</p>

	Area, 85 Gracechurch Street, Principle of Redevelopment and Daylight, Sunlight, Overshadowing.
The Parochial Church Council of St Peter upon Cornhill	<p>A letter has been received from St Peter upon Cornhill stating that they plan to submit a written representation on the application, and they may wish to register an objection.</p> <p>The letter received does not object but is a holding response.</p> <p>No further communication has been received.</p>

Support

Museum of London	<p>A letter of support has been received from the Museum of London who confirm discussions and positive dialogue in relation to the opportunity to partner with the developer on the proposed Cultural Plan for the site.</p> <p>They state that:</p> <p>This partnership will be built around the proposed cultural offer at 85 Gracechurch Street, including a significant space on Level 05 dedicated to a 'Heritage Garden', which will provide a publicly accessible outdoor garden space and a heritage walkway, with open views across the intricate and stunning rooftops of the Leadenhall Market. Additionally, this new space will offer opportunity to celebrate the historical significance of the site, which was once home to the Roman Forum, through the potential display of finds from the archaeological investigations of the project, as well as the use of Virtual/Augmented Reality to allow visitors the opportunity to experience the site as it once was.</p> <p>In our view, the benefits of such a partnership to the museum's audiences and the wider public, in both the short and long term, are very exciting. We are enthusiastic about, and supportive of, the 85 Gracechurch Street Cultural Plan, and the contribution it would make to the immediate neighbourhood around our future home in West Smithfield, and to the wider Culture Mile.</p>
BeauGems	<p>A letter of support has been received from BeauGems, a trader in Leadenhall Market.</p> <p>They state that:</p>

	<p>As a trader in Leadenhall Market, we believe the proposals will help create a complementary 7-day-a-week destination in the City of London that will benefit businesses in the Market, and surrounding area, by bringing a new and more diverse footfall to the area throughout the week and into the weekends. We have also been reassured that the curated offer in the proposed public hall will compliment and not seek to compete with Leadenhall Market. We believe the additional space that the public hall will provide will complement Leadenhall Market by providing opportunities for complementary public uses and events.</p> <p>More widely, the proposals for the new public hall and subsequent routes through the site, will strengthen the area's appeal and increase activity in and around Leadenhall Market. I also consider the introduction of the proposed cultural uses at the proposed fifth floor level, particularly in partnership with the Museum of London, will help to celebrate the area's heritage, broaden the diversity of visitors to the area, and the times in which they visit, in particular families and those visiting at weekends.</p>
<p>Eastern City Business Improvement District</p>	<p>A letter of support has been received from the EC Business Improvement District.</p> <p>They state that:</p> <p>The impact of COVID and the consequent emergence of hybrid working has deeply impacted the City of London, its workforce patterns and its essential supporting 'ecosystem' of shops, cafes, bars and restaurants, all of which contribute to the intrinsic appeal of the City Cluster, itself the place where Roman London started many years ago.</p> <p>The Leadenhall Market area itself specifically evidences the paradox of the City's return to work economy, namely the desire of major firms to acquire new Grade A, best in class office accommodation to both retain existing and attract new staff vs the seriously reduced retail and F&B offering due to so many smaller scale businesses having gone under, either during, or post COVID, with the extensive lockdowns followed now by the devastating impact on the Xmas trading period of the train strikes as well as labour shortages and significantly increased energy costs.</p> <p>The many empty units in Leadenhall Market evidence this decline and the need for transformational change to the area at ground floor level to increase the diversity of the area's appeal and to encourage both 'dwell time' and</p>

	<p>spending. The popularity of the two pubs in Leadenhall Market on certain nights of the week simply does not underpin the broader offering which is needed if the area is to aspire to be a true part of the Corporation's Destination City Initiative.</p> <p>We are therefore pleased to see the proposals in the applicant's scheme design to create new links between their site and the Market itself which we believe will help to catalyse further visits to the area, not just during the now reduced working week or Tuesday, Wednesday and Thursday but also for the extended opportunity to attract tourist visitors to the area, and to the Market itself, to dwell and to spend.</p> <p>The partnership with the Museum of London can be significant in reinforcing this offering which will dovetail with Destination City and the other initiatives which the BID is promoting. The BID is therefore pleased to strongly support the proposed application design and looks forward to the change which its implementation, if consented, can contribute to the next evolution of the EC area.</p>
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40. Not all the representations above are material planning considerations. Those that are, have been dealt with in this report.

Policy Context

41. 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.
42. The City of London (CoL) 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). The Draft City Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
43. 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.

44. 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”.

The NPPF

45. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
46. 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:
 - 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.
47. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
- c) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
 - d) 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
 - e) 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).
48. 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, considering both local business needs and wider opportunities for development.
49. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.

50. 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.
51. Paragraph 93 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.
52. 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”.
53. 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.
54. 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”.
55. 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.”
56. 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.

57. 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...'
58. Paragraph 134 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
59. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.
60. Paragraph 154 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.
61. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. 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.
62. Paragraph 195 of the NPPF advises that Local planning authorities should identify and assess the particular significance of any heritage

asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

63. Paragraph 197 of the NPPF advises, "In determining applications, local planning authorities should take account of:
- f) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - g) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - h) the desirability of new development making a positive contribution to local character and distinctiveness."
64. Paragraph 199 of the NPPF advises "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
65. Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- i) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
 - j) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
66. Paragraph 202 of the NPPF states "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".
67. Paragraph 203 of the NPPF states "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that

directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.

68. 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

69. 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 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).
70. 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).
71. In exercising planning functions with respect to buildings or land in a conservation area, there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. (S72(1) Planning, Listed Buildings and Conservation Areas Act 1990).
72. In considering the planning application before you, account has to be taken of the documents accompanying the application, the environmental information including the Environmental Statement, the further information, any other information and consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.
73. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it.

74. The principal issues in considering this application are:
- k) The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.
 - l) The economic benefits of the proposal.
 - m) The appropriateness of the proposed uses.
 - n) The appropriateness of the architecture and urban design of the proposals.
 - o) The impact of the proposal on the Tower of London World Heritage Site.
 - p) The impact on strategic views in the London Views Management Framework and on other strategic local views.
 - q) The impacts of the proposal on designated heritage assets
 - r) The potential impacts of the development on buried archaeology
 - s) The proposed public realm benefits and cultural offer
 - t) Transport, servicing, cycle parking provision and impact on highways.
 - u) The impact of the proposed development on the amenity of nearby residential and other occupiers, including noise, overlooking, daylight, sunlight and light pollution.
 - v) The environmental impacts of the proposal including wind microclimate, flood risk, air quality, building resource efficiency, energy consumption and sustainability.
 - w) The outcome of the Health Impact Assessment
 - x) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010)
 - y) The requirement for financial contributions and other planning obligations

Economic Issues and the Principle of Development

75. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
76. 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 590,000 people.

77. 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.
78. 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 many 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.
79. 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.
80. 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 2022 London Labour Market Projections), that City of London employment will grow by 176,000 from 2016 to 2041.
81. 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.
82. London Plan Policy GG2 sets out the Mayor's good growth policy with regard to making the best use of land. These include prioritising sites

which are well-connected by existing or planned public transport; proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling; applying a design-led approach to determine the optimum development capacity of sites; and understanding what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character.

83. London Plan Policy GG5 sets out the Mayor's good growth policy with regard to growing London's economy, To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, it is important that development, amongst others, promotes the strength and potential of the wider city region; plans for sufficient employment and industrial space in the right locations to support economic development and regeneration; promote and support London's rich heritage and cultural assets, and its role as a 24-hour city; and makes the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity
84. The London Plan projects future employment growth across London, projecting an increase in City employment of 176,000 between 2016 and 2041, a growth of 31.6%. 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.
85. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
86. 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.
87. The Strategic Vision of the emerging City Plan (2036) sets out that the City Corporation will facilitate a vibrant, thriving and inclusive City, supporting a diverse and sustainable London within a globally successful UK through a range of objectives including: delivering sustainable growth following the Covid-19 pandemic, including a minimum of 2 million m2 net additional office floorspace, and protecting existing office floorspace to

maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone; broadening the City's appeal by ensuring new office developments deliver healthy working environments and meet the needs of different types of businesses, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses; supporting the development of cultural facilities and uses and transforming the north west of the City into a vibrant strategic cultural area of national and international status through the Culture Mile initiative; focusing new tall buildings in the existing cluster in the east of the City, adding to the City's distinctive and iconic skyline while preserving strategic and local views of St Paul's Cathedral and the Tower of London World Heritage Site; encouraging retail and other town centre uses that provide active frontages throughout the City, while focusing significant retail development in the four Principal Shopping Centres; and balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces;

88. 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.
89. The application site is located within an area identified as the Eastern Cluster in the Local Plan 2015 (Figure G) and within the City Cluster area (Figure 33) identified in the draft City Plan 2036.
90. The Cluster Policy area is defined by an illustrative diagram in the adopted and emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on appropriate sites. As outlined at paragraph 2.7 of the Local Plan and paragraphs 3.5.5 and 7.1.3 of the draft City Plan 2036 the boundary as shown in the diagrams are indicative.
91. The Strategic Objective in relation to supporting a thriving economy within the emerging City Plan (2036) states that to support a thriving economy, maintaining the City's position as a global hub for innovation in financial and professional services, commerce and culture.
92. Paragraph 3.4.4 of the emerging City Plan (2036) identifies the City Cluster as a key area of change where office and employment growth will be successfully accommodated by a cluster of dynamic, attractive, sustainably designed and appropriately scaled tall buildings, providing an

iconic view of the City and enhancing its role as a global hub for innovation in finance, professional services, commerce and culture. Complementary retail, leisure, cultural and educational facilities will support the City's primary business function, principally through animating ground floor spaces.

93. Paragraph 3.2.2 of the emerging City Plan (2036) sets out the requirements that the quantity and quality of new development, particularly office-led development, will meet growing business needs, supporting and strengthening opportunities for the continued collaboration and clustering of businesses that is vital to the City's operation.
94. Paragraph 3.3.5 of the emerging City Plan (2036) sets out that the City will remain a centre of world class architecture with flexible, adaptable and healthy buildings and a high quality of public realm for people to admire and enjoy. Further tall buildings will be encouraged where they can make a positive contribution to their surroundings and the skyline and provide for the health and wellbeing of workers, adding to the tall building cluster in the east of the City.
95. 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.

Proposed Uses

96. The proposed building has been designed to provide a flexible workplace-led mix of uses. The 32 storeys above ground predominantly provide office use (Class E) with a Public Hall (Sui Generis) at ground floor, a Heritage Garden and Cultural Space (Sui Generis) at fifth floor accessed directly from the ground floor which provides amenity for City workers, residents and visitors, and areas of flexible retail use (Class E(a), E(b), drinking establishment (Sui Generis) and hot food takeaway (Sui Generis) at ground, first and fifth floor.

Provision of Office Accommodation

97. Strategic Policy CS1 of the City of London Local Plan 2015 and policy 4.2 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers. 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. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2036 and policy E1 of the London Plan.
98. The proposed development is predominantly an office building, comprising of 35,137 sq.m GIA of office space Class E(g)(l). The total GIA is 37,492 sq.m, resulting in 2,355 sq.m of other uses. The office space is classified as Grade A office space. It is predicted to accommodate 1,719-2,210 Full Time Equivalent (FTE) jobs. Adopted Local Plan Policy CS1 seeks a significant increase in new office floorspace in the City and Policy CS7 seeks to deliver new high-quality office floorspace on the Eastern Cluster. The draft City Plan, Policy S1, seeks to deliver 2 million sqm net of new office floorspace in the period between 2016 and 2036. Draft City Plan policy S4: City Cluster, also seeks to deliver an increase in sustainable, world class office buildings in the City Cluster Key Area of Change. The proposed development would deliver an increase of 27,466 sq.m GIA in Grade A office floorspace on the Cluster, contributing to the achievement of the office floorspace target in both the adopted and emerging draft Local Plans.
99. At 31st March 2022, 1,261,000 sq.m net increase in office floorspace had either been delivered, was under construction or was permitted in the City. A further 739,000 sq.m net is required to meet the draft City Plan target of 2 million sq.m net by 2036. The proposed development would deliver nearly 4% of this remaining floorspace target.
100. The proposed development is 32 storeys. The office use is accessed from Gracechurch Street with escalators to the lobby on Level 2 with lifts to the upper floors. Office uses are provided on Levels 2, 3, 4, separated from floors 6 to 32 by a public event space and plant floors. Retail space is located at ground level. Emerging City Plan Policy OF1 promotes commercial uses as part of office-led development at ground levels to activate streetscapes.
101. The typical office floorplate is 800 sq.m. The office spaces are designed to support a range of tenants, with flexibility to enable areas of the floor to be removed to connect levels and create double height spaces. Emerging City Plan Policy S4 encourages new floorspace to be designed to be

flexible to allow adaptation of space for different types and sizes of occupiers.

102. A range of office floorspace is required to meet the future needs of the City's office occupiers, including provision for incubator, start-ups and co-working space. The S106 agreement would include an obligation to make specific and identified provision within the development for such occupiers.
103. 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 35,137 sqm GIA of high quality, flexible Class E office floorspace for the City, contributing to its attractiveness as a world leading international financial and professional services centre.

Proposed Retail

104. The application site is located within the designated Leadenhall Market Principal Shopping Centre (PSC) as set out in the Local Plan (2015). The existing site contains 364sq.m of retail floorspace including a health and wellness (Holland & Barrett) retail unit and a healthy food to go chain retail unit occupied by Pure. The proposed works to this site would provide 580sq.m of retail uses (Class E and Sui Generis) floorspace, with potential for an additional retail uses if a Public Hall (928sq.m) are included within the retail provision. However, it is envisaged this would predominately include public realm and commercial/cultural uses. Therefore, there would be an uplift in retail floorspace, and three proposed flexible retail spaces would be accessed via this Public Hall and provided at ground, first and fifth floor. One of these units has the potential to be adapted in order to create a passageway into Leadenhall Market creating better permeability, should there be the desire to open up a route in the future by the freeholder.
105. Active retail frontage would be retained across the ground floor units on Gracechurch Street. It is envisaged further retail provision would be provided in the Public Hall areas including pop-up/'micro-retail' retail spaces such as stalls and kiosks which would enliven the public realm in this location and enable public events to take place which would activate the frontages of the building.
106. Leadenhall Market is located adjacent which in recent years is underperforming however the addition of this proposed development

through wider range of multi-use spaces and activities of a cultural and retail nature would encourage footfall and retain a higher proportion of visitors. The reinstatement of a historic City public route running through the site would enable better access between the traditional retail units within the Victorian Market and the proposed new development.

107. Policy DM1.5 aims to encourage a mix of commercial uses within office developments which contribute to the City's economy and character. Adopted Local Plan Policies CS20 and DM20.1 prioritise retail uses within PSCs and seek to resist the loss of retail frontage and floorspace. Emerging City Plan policy RE1 encourages the continued provision of retail uses in the PSC and complementary uses that provide an active frontage. The proposals are in conformity with both emerging and adopted Local Plan retail policies.

Heritage Garden & Cultural Space

108. Local Plan policy DM10.3 and draft City Plan 2036 policies S8, S14 and DE5 seeks the delivery of high quality, publicly accessible elevated viewing spaces where they don't immediately overlook residential premises. Public access to tall buildings in the City is important in creating an inclusive City for all.
109. A Heritage Garden and Cultural space occupy the entire fifth floor and it includes a generous woodland terrace adjoined by a wellness garden and a Heritage Walkway which provides a circular walking route around the east side of the terrace including a cantilevered section providing views over the Leadenhall Market roofscape, of the Lloyd's Building and the wider Cluster.
110. The Heritage Garden and Cultural space has been designed to avoid overlooking to any nearby residents. Planting would occupy the area which the largest chance of any overlooking and the Heritage walkway and internal route has been set back sufficiently to ensure that the amenity of nearby residents is not compromised and, in some areas, is enhanced in accordance with local plan policies CS19(1) and DM10.3.
111. The Cultural space is in the main part of Level 5 and provides a large, flexible internal space. The woodland area would front Gracechurch Street on the western part of the terrace and would be densely planted to provide a serene environment. The terrace would be visible from Gracechurch Street with clear signage to this free space.
112. The Applicant has entered into a Partnership Agreement with the Museum of London (MoL) for MoL to be the cultural content partner for

the Level 5 Heritage Garden and Cultural Space. The space would provide an opportunity for visitors to understand the Roman history of the site, through the display of artifacts which have been excavated from the site of the Roman Forum, which are currently stored in archives. There would be an opportunity for modern interpretation currently envisaged to be a virtual reality experience.

113. The fifth-floor space would also include an element of flexible retail floorspace and seating, which would be a complimentary offer. There would be no obligation to use this or purchase anything for users of the space.
114. The space would contribute to the network of free to enter public viewing galleries across the City and internally would incorporate culture, curated by MoL.
115. The Heritage Garden and Cultural Space would be free to access and would involve successful management of the space. The Heritage Garden would be open all year round (except Christmas Day, Boxing Day, New Year's Day if required) and during the hours of 10am to 7pm or nautical dusk whichever is the later and there is no need for a booking system for users and the space would not be closed for private events during those hours. The Cultural Implementation Strategy would cover potential use for events outside the public hours which would be secured via a Section 106 agreement. It would be accessed from the ground floor with dedicated lifts and security checks.
116. A Visitor Management Plan would be secured through a Section 106 agreement with the finer details of the operation and security checking arrangements to be negotiated.

Design and Heritage

Principle of a Tall Building:

117. The proposal is considered a tall building as defined by the adopted Local Plan (CS14, para 3.14.1) and the emerging City Plan 2040 (S12(1), 75m AOD>).
118. With reference to the 'Eastern Cluster' Policy Area in the adopted Local Plan (Policy CS7, fig. G) and in the revised 'City Cluster' Policy Area (emerging Policy S21, fig. 33) in the emerging City Plan 2036, the proposal is located in the City Cluster of tall buildings. For the spatial purposes of London Plan Policy D9(B), the application site, due to its location in the Eastern/City Cluster of tall buildings, is considered in a location identified as suitable for tall buildings in the Development Plan. This view is confirmed by the GLA in its Stage 1 letter.

119. However, on a site-specific basis, the proposal is in the Leadenhall Market Conservation Area, therefore falling within a localised area that is both within the wider designated tall buildings cluster area and also deemed 'inappropriate for tall buildings' under Local Plan Policy CS14 (because it is in a conservation area) and draft City Plan 2036 Policy S12. It is recognised that there is a tension between the wording of London Plan Policy D9, which envisages under Part B that locations where tall buildings may be an appropriate form of development will be identified in development plans, and the more dated Local Plan 2015 Policy CS 14 which identifies only areas which are 'inappropriate'. Here, the proposal draws in-principle support from its location in the City Cluster, whilst being located in an inappropriate area as referred to in CS14(2) as it is in a conservation area. In *R (oao LB of Hillingdon) v. Mayor of London* [2021] EWHC 3387 (Admin), the High Court held that London Plan Policy D9(B) was not a pre-condition or 'gateway' to the application of the criteria in D9(C). In other words, even where a proposed tall building falls outside an area identified as suitable in a development plan under Part B, the impacts of the tall building as set out in Part C should still be considered.
120. An assessment against London Plan Policy D9 (C) and (D) is made below, with reference where relevant to other sections of this report. It is found that the proposal would satisfy the criteria in (C) and (D), including in relation to Part C (d), finding that it would not harm the significance of the Leadenhall Market Conservation Area.
121. As a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9 but would conflict with Local Plan Policy CS 14(2). This conflict with a Development Plan policy is addressed at the end of the report when considering whether the proposal accords with the Development Plan as a whole, as part of the Planning Balance.

Tall Building – Impacts:

122. This section assesses the proposals against the requirements of policy D9(C 1-3) and (D) of the London Plan. The visual, functional, and environmental impacts are addressed in turn, with reference to the wording of the policy. Further assessment of the architectural approach and design details follow on below.

Visual Impacts:

123. In relation to London Plan Policy D9(C; 1; i) the impact of the proposals upon the City and wider London skyline in long range views has fundamentally informed the optimisation of site and the overall height and form. The height and form of the proposal has been amended to ensure that the proposal would preserve the pre-eminent skyline setting of St Paul's in strategic views from the Processional Route, as Historic England acknowledges in its letter. It has also been designed to step down from the summit of the emerging City Cluster in strategic riparian views and assisting in assimilating the isolated bulk of 20 Fenchurch Street into a coherent cluster and urban form, in line with the long-term Plan-led approach in which the GLA, CoL and HE have played a significant curatorial role. The top is designed with a flourish offering a pleasingly subtle 'crown' in those wider views. The base of the tower is set back from the edges atop a podium piece which responds to local views and which includes the preservation and enhancement of the principal Conservation Area façade.
124. In relation to D9(C; 1; ii), mid-range views, the proposal relates appropriately to the form and character of the developing Cluster, stepping down in height southwards towards the River from its apex at 22 Bishopsgate/1 Undershaft. In comparison, the proposal is of a more modest height than other existing and consented tall buildings in the Cluster, given here for reference (in descending AOD height order):
- 1 Undershaft: 304.9m
 - 22 Bishopsgate: 294.94m
 - 122 Leadenhall Street (the 'Cheesegrater'): 239.40m
 - Heron Tower: 217.80m
 - 52-54 Lime Street: 206.50m
 - Tower 42: 199.60m
 - 30 St Mary Axe (the 'Gherkin'): 195m
 - Leadenhall Court: 182.7m
 - 20 Fenchurch Street: 160m
 - 85 Gracechurch Street: 155.70m
 - 70 Gracechurch Street: 155m
 - 50 Fenchurch Street: 149.6m
 - 55 Gracechurch Street: 146m
125. The proposal has therefore been designed with the future evolution and consolidation of the Cluster in mind. As such the proposals will be appreciated as in keeping with the evolution of the Cluster, readily identified as part of this group and reinforcing the spatial hierarchy of the local and wider context. Its sculpted, serrated silhouette and elevations of pale masonry and extensive urban greening would give the proposal a distinctive identity on the skyline and create a distinct albeit familial relationship with the predominantly glazed and more formally geometric

profiles of its built, emerging, and consented neighbours. (D9 C:1:a:ii, D9 C:1:b).

126. The design response has evolved specifically in reference to identified sensitive townscape viewpoints illustrated within the HTVIA. The principal elevation addresses Gracechurch Street, with the remainder to the rear situated within the medieval street pattern of the Leadenhall Market Conservation Area. The local context therefore exhibits a duality between the compact plots and lower rise buildings within the Conservation Area and the existing towers of the City Cluster, which create an immediate backdrop and wider context experienced alongside the Conservation Area.
127. The retention and restoration of the principal Gracechurch Street elevation ensuring its positive contribution to the local streetscene is conserved and enhanced. The solid masonry base and set back of the tower element will allow for a positive relationship of the base with the surrounding built frontages, reinforcing their scale and contrast with the City Cluster rising above, allowing the scale and character and vitality of the street to be preserved.
128. The transitions in scale seen in the surrounding context are also respected through the provision of a heritage garden at roof level, creating a break in the built frontage to Gracechurch Street before the tall building element continues above. This Heritage Garden provides an area of publicly accessible open space available at no charge (D9;D). A sense of vitality is further promoted with the re-establishment of a historic through-route across the site, with the provision of a Public Hall enhancing a sense of activity at street level (D9 C:1:a:iii). This enhances permeability within the general surroundings and provides the maximum feasible amount of open space. A complete description and assessment of the podium and tower's design is addressed below, and this has been found to be of the highest architectural quality, ambitious in scope and calibre (D9C:1:c).
129. A full assessment of impact with regards to heritage assets, particularly with regard to the Leadenhall Market Conservation Area is outlined in the relevant sections below. The conclusion of his assessment is that the proposed development will result in an overall modest enhancement to the Conservation Area. This assessment has concluded that the proposals will be appreciated as part of a dense, close-knit consolidating backdrop of tall buildings. The visual strength of this existing juxtaposition is such that, while it is acknowledged the proximity of the proposals could feel uneasy in certain views to the market, this would be balanced out by the replacement of poor quality with high quality architecture, nullifying those fleeting incidents with countervailing benefit. Further to this, the

following enhancements to the Conservation Area have been identified, (i) the restoration of the principal historic façade of 85 Gracechurch Street (ii) the reinstatement and reinterpretation of a historic space through the site and (iii) the further activation of the streetscape surrounding the market, amplifying a sense of the historic experiential setting to the market which would have been defined by the bustle of diverse commercial trade and consumption (D9 C:1;d-e).

130. A low level of less than substantial harm has been identified to St Michael Cornhill (grade I listed), and slight levels of less than substantial harm to Tower Bridge (grade I listed) and the Bank Conservation Area. For the reasons set out in detail in this report, it is considered there is clear and convincing justification for this, not least the delivery of an important site in the long-term consolidation of the City Cluster, and that the harm is more than just outweighed by wider public benefits, including heritage benefits, in this instance. Overall, it is considered the proposal would make a positive contribution to the core and unique character of the City Cluster in which it is situated and options were explored as part of an optimisation exercise to avoid and mitigate harm to heritage, as set out in this report.
131. In accordance with D9 (C; 1; e), the proposal has been found through detailed analysis, referred to later in this report, not to cause harm to the Outstanding Universal Value of the Tower of London World Heritage Site, and the ability to appreciate it. This is by reason of its siting within the long-established and consolidating Cluster backdrop, intervening distance and height when viewed from in and around the Tower of London.
132. In accordance with D9 (C; 1; f), the proposal would be set well back from the banks of the River Thames, outside the Thames Policy Area. It would step down towards 20 Fenchurch Street at the 'prow' of the emerging Cluster, which then steps down to preserve the historic scale of the Upper Pool of the River Thames, preserving the open quality and views of/along the River, avoiding a strong 'canyon effect' when seen in association with the London Bridge Cluster.
133. In accordance with D9 (C; 1; g), the proposal would not cause adverse reflected glare, addressed elsewhere in this report, in particular due to its modern masonry grid designed to enhance sustainability and prevent solar gain.
134. In accordance with D9 (C; 1; h), the proposal has been designed to minimise light pollution from internal and external lighting, which is inherent in the façade, and will be secured in detail via condition.

135. The proposal has been assessed by reference to the potential impacts set out at Policy D9 (C; 1) and is considered to accord with that element of the policy.

Functional Impact:

136. Through interrogation via the pre-app process the internal and external design and construction detailing, materials and emergency exit have been designed to ensure the safety of all occupants (D9;C;2;a). Similarly the proposals have been assessed and developed from the start of the proposals to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality, without disturbance or inconvenience for surrounding public realm (D9;C;2;b). Particular care has been taken with regards to the Public Hall, Heritage Garden and office uses so that entrances, access routes and floorspaces have been designed to allow for peak time use, avoiding unacceptable overcrowding or isolation in surroundings (D9;C;2;c). In particular the provision of a Public Hall and heritage garden is considered an ambitious offer which will promote the creation of jobs, services, facilities and economic activity (D9;C;2;e).
137. The proposals have also been thoroughly tested with regards to the capacity of the transport network in the area, proving the existing services are able to provide sufficient access to facilities, services, walking and cycling networks, and public transport for people living or working in the building (D9;C;2;d). No adverse effect has been identified on the operation of London's aviation navigation and the proposals also have been found to avoid significant detrimental effect on solar energy generation on adjoining buildings (D9;C;2;f).
138. It is considered the proposal would meet the functional considerations of Policy D9 (C; 2).

Environmental Impact:

139. The proposals have been found to provide safe and suitable levels of wind, daylight and sunlight and temperature conditions will not compromise the comfort and enjoyment of open spaces. The design is considered to ensure safe and comfortable levels of solar glare and solar convergence (D9;3;a). Additionally, the design has given consideration for how the proposals can assist with the dispersal of air pollutants and will not adversely affect street-level conditions or create harmful levels of

noise from air movements, servicing or building uses, preserving the comfort and enjoyment of surrounding open space (D9;3;b-c).

140. It is considered the proposal would meet the environmental considerations of Policy D9 (C; 3).

Public Access:

141. The proposal would deliver a new public route and large new Public Hall at ground floor level, while at fifth floor level the proposal would incorporate a Heritage Garden with viewing walkway. Both of these would comprise free to enter, publicly-accessible areas and their locations are the optimal ones to unlock (i) vastly improved pedestrian experience and amenity at ground floor level and (ii) optimal views at roof level over the Leadenhall Market Conservation Area and of the City Cluster. It is considered that the provision of publicly accessible open space has been optimised in respect of the site's particulars and that the proposal would meet the considerations of Policy D9 (D).

Tall Building, Principle, Conclusion:

142. Overall it is the view of your Officers that the proposed development accords with London Plan Policy D9, but conflicts with Local Plan Policy CS 14(2).

Design Approach: Architecture, Urban Design and Public Realm

Architecture:

143. Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate the significant growth of core CAZ employment and complementary commercial/leisure uses which are at the heart of the strategic delivery function of the City Cluster to accommodate substantial growth in accordance with Policies CS7 and London Plan Policies SD 4, SD5 and E1.
144. The architectural design approach has been amended through the planning process to consider options and strike the overarching balance of growth need and heritage conservation, which is at the heart of the strategic balance of the Plan-led approach to growth in the CoL. This is in line with the long-term Plan-led approach to consolidating substantial

uplift in commercial uses in the defined City Cluster of tall buildings, allowing for the capacity of the site to be optimised relative to strategic heritage constraints, whilst allowing for higher densities commensurate with the uniquely high levels of economic agglomeration and public transport connectivity in this part of the CoL and wider CAZ. This long-term approach has created an emerging and also unique site context, in terms of character, to which the proposal has been designed to respond. Overall, for the reasons set out below, it is considered that the proposal would accord with the design-led approach of London Plan Policies D3 and D8, delivering a design solution making effective use of limited land resources, in accordance with strategic Local Plan Policy CS10 (and emerging Policy S8).

145. It is considered that the scheme would represent 'Good Growth' by design, in accordance with the London Plan Good Growth objectives GG1-6: growth which is socially, economically and environmentally inclusive.
146. The site lies on the western edge of the City Cluster, with its principal frontage to Gracechurch Street and the remainder embedded within the tight-knit, fine-grained medieval street pattern of the Leadenhall Market Conservation Area. It thus has two very distinct local contexts to which this proposal seeks to respond: the matrix of chiefly low-rise buildings on compact plots arranged upon the medieval streets, and, above these, the existing towers of the City Cluster, modelled to form a cohesive Cluster on the City's skyline, which appear as an immediate backdrop against which the Conservation Area is perceived and experienced from ground level.
147. Fundamentally shaped by the local distinctiveness of these two contexts, the proposal would comprise architecture of the highest quality, with outstanding sustainability credentials, be attractive and contextual at numerous scales and would, in the form of the proposed Public Hall at ground floor level, deliver a landmark new civic space in support of Leadenhall Market and of the City's wider 'Destination City' initiative. It would resolve the design challenges posed by the site by comprising two main elements: a street-level building or 'podium' with a tower above.
148. The podium would be an outstanding response to the site's local distinctiveness. It would retain and incorporate the existing 1930s building's Gracechurch Street frontage, modified by recessing the existing bronze windows to give greater depth, introducing new bronze window elements to the lower parts and widening the existing stone surround. The treatment of this façade is considered to be a finessed and sensitive response to the local context.

149. Beyond would be perceived and accessed the proposed new Public Hall, taking up almost the entire ground floor plane, of double- and triple-height proportions. It alone would be an outstanding new piece of architecture. Entering from Gracechurch Street, the public would pass through a broad, 7.2m high entrance space, then into a 9.5m high arched vestibule, then into a triple-height Hall of soaring columns terminating in a digital soffit displaying ambient patterns that would filter appealingly down through perforations in the ceiling tiles (into which acoustic mitigations would also be integrated). The Public Hall would be of pale stone and concrete materiality and incorporate simplified Romanesque arch motifs to refer to the Roman origins of the site; the materials would be humane, but the generous spaces formed by them sophisticated. The multi-level form of the Hall is further intended to evoke a former galleried, early modern coaching inn, the Spread Eagle, on the site, and would reinstate a lost historic route connecting Gracechurch Street and Lime Street Passage.
150. Within the Public Hall, retail units would animate the frontage to Gracechurch Street and the rear eastern entrance. Lifts to the Level 5 Heritage Garden (see below) would be prominently positioned in front of the main entrance, while the entrance to the office floors above would be via escalators located in a quadruple height space along the south wall terminating in clerestory windows which would provide dramatic natural illumination to the Hall. Largely framed by a narrow slot between the Leadenhall Market buildings, the east elevation would chiefly consist of a simple arched portal providing compelling glimpses of the Hall beyond.
151. At fifth floor level, the proposed Heritage Garden would present to Gracechurch Street a lush ensemble of trees and planting that would serve as a visual break between the retained façade below and the commencement of the set back tower above. This planting would wrap around to the south elevation. To the north-east and east facades, a walkway would cantilever out from the proposal, forming a viewing platform from which to appreciate the intricate Victorian roofscape of Leadenhall Market and that of the wider Conservation Area; and would create new views of the City Cluster and other heritage assets in the vicinity, including the Grade I listed Lloyds of London building. This has been designed with regard to neighbourliness, existing rooflines and views and would optimise public access in the most compelling area of the scheme, in accordance with Local Plan policy DM10.3 (2).
152. The podium part of the proposed development therefore represents an outstanding design response to the local distinctiveness of the site, retaining and finessing its existing scale and architectural character while introducing new spaces, architectural forms and materials and creating new views which multifariously respond to phases in the site's history and the rich, humane context of the Leadenhall Market Conservation Area, all

in accordance with London Plan policy D3, Local Plan policies CS 10, DM10.1, DM10.3 and emerging City Plan 2040 S8.

153. Above the podium, the fundamental layout, orientation, scale, appearance, and shape of the tower are a response to the local distinctiveness of the Leadenhall Market Conservation Area and the wider City skyline.
154. The plan and profile of the tower are derived from the irregular, medieval site plan which has been carried upwards through the tower's form to celebrate the site's location within the fine grain of the Leadenhall Market Conservation Area. The distinctively stepped upper reaches of the proposal on the south and east elevations respond to the seminal views of St Paul's Cathedral along the Processional Route; the stepping back of these elevations would ensure that the proposal would at no point be visible in the views of the Cathedral along Fleet Street and Ludgate Hill. As previously stated, the tower is considered a convincing and high-quality response to this macro, strategic view-level context.
155. The tower would be more solid rather than fully glazed in appearance and would consist of primary horizontals interspersed with fluted double-height columns. These cranked horizontals and fluted columns are directly inspired by existing architectural motifs in Leadenhall Market; they would set it apart from its primarily glazed neighbours and diversify the Cluster as a group. To Gracechurch Street, the foot of the tower would be set back from the retained Gracechurch Street frontage and step forward every double floor level until becoming flush with the building line at level 12. This is considered an appropriate way to distinguish the two parts of the building and maintain sufficient breathing space above the retained elevation. Furthermore, the upper setbacks to the south and east elevations would help to minimise the visibility of the tower from the tight-knit network of surrounding streets, giving it visibility only from a more limited spatial area.
156. The elevations would incorporate user-operated ventilation panels flanking the fluted columns and plenums for building plant. Deep, projecting planters with raked, reflective soffits and chamfered corners would create dynamism, depth, and modelling to the west elevation; while to the east elevation to Lime Street Passage a similar arrangement of deep, projecting planters is proposed; on both elevations they would act to give the tower a distinctively serrated silhouette on the skyline.
157. Atop the tower, the final three floor levels would be expressed differently in the form of a 'crown' of triple-height columns, disengaged (for emphasis) to the west elevation and integrated into the serrated profile of the stepping upper edges of the south and east elevations. Atop this, the

roofscape of the building would comprise two interlocking isosceles triangles housing, variously, integrated building maintenance equipment, plant grilles, photovoltaics, and a sedum roof. This is considered to be an integrated approach to the building's fifth elevation, in accordance with Local Plan policy DM 10.1(6) and draft City Plan 2040 policy S8(10)

158. The very concept of the 'Public Hall' proposed at ground level elides well with the history of public gathering and trading on the site since the Roman period; the architectural forms deployed by the scheme would suitably evoke that period. The space at fifth floor level devoted to interpreting the Roman Forum-Basilica would further parse the history and local distinctiveness of the site. Finally, the plan form and cranked and fluted detailing of the tower above all derive from the surroundings. Whilst some conflict has been found with some heritage assets (addressed elsewhere in this report), it is considered that overall the proposals would very much build on the spirit of the place, local history and distinctiveness through its detailed design approach and, overall, enhancing local history and distinctiveness in accordance with NPPF policies.

Urban Design and Public Realm:

159. The proposal would optimise Healthy Streets goals by creating a destination for a broad demographic of pedestrians. It would be accessible and welcoming to all, reachable on foot from numerous public transport systems with prominent and legible pedestrian/cyclist entrances from two sides. The proposal would have excellent public transport connectivity and would incorporate widened footways to Gracechurch Street and 104 short stay and 505 long stay cycle parking spaces, thereby making it possible for a majority of visitors to walk, cycle or use public transport to access the proposal, all in accordance with Policies T1(B) and T2 of the London Plan, as well as CS10 (4,5), CS16 (3ii), DM10.4 (2,8) DM10.8(2) DM16.3 of the Local Plan policies and S10, AT1 (1,2,4) AT3(1), S8 (1,2), DE2 (2) of the emerging City Plan.
160. The proposed east-west route across the site would consist of active frontages and would be a multifunctional space for people to traverse, dwell, socialise or imbibe events and cultural offerings. This is in accordance with S8 (6) of the emerging City Plan, D3(D;3,6,10) and D8(F,G) of the London Plan and DM 10.1(9) of the Local Plan.
161. The proposal would incorporate significant urban greening, focused on the east, west and upper south elevations where 1.5m deep planters would be integrated into the building's architecture holding a medley of shrubs selected for their performance under the respective solar and wind conditions of these upper reaches of the tower; the Heritage Garden

would, at its western end, incorporate 1.75m deep planters to support tree growth as well as shrubs and other plants, while a biodiverse sedum roof would crown the building. Urban greening has therefore been integral to the architectural approach, in accordance with DM 10.2 of the Local Plan and S8(7) of the emerging City Plan

162. Similarly, the servicing of the building has been seamlessly integrated into the design of the ground floor Hall, where a concealed vehicle lift would provide access to subterranean servicing bays between 11pm and 7am, following the cessation of public use of the Hall. Further assessment can be found within the Transport section elsewhere in this report.
163. The architecture of the tower has been designed to optimise natural ventilation through openable panels at all floor levels, while the solidity of the elevations would provide solar shading and alleviate thermal gain, thereby reducing the need for mechanical heating and cooling; all in compliance with Policy SI 2 (A) and SI 4 of the London Plan, Local Plan Policies CS15 (2,i) DM15.2 (1), DM15.5 (2) and Policy CR1 of the emerging City Plan.
164. An outline architectural lighting strategy has been submitted which shows that lighting would be subtly integrated into the facades at various locations, chiefly concealed within the planters, arranged around the Heritage Garden, and internally within the building's crown. This has been developed with regard to the City of London's Draft Lighting SPD and the spatial design considerations for the City Cluster Character Area Full details of the building's lighting would be secured via condition.
165. Throughout the proposal, signage would be discreetly located in various zones around the Public Hall, advertising the presence of the Heritage Garden, the retail units and various functions as required; details of these would be secured via condition. Signage to the building's exterior elevations to Gracechurch Street and Lime Street Passage would be sensitive, where required, having regard for and in accordance with CS 10(7), DM 10.5 of the Local Plan and S8 (12) of the emerging City Plan 2040.
166. The proposal amounts to a high-quality piece of design and an outstanding design response to local and pan-London contexts. Various conditions are proposed to ensure that the promise of the proposals is fully realised at detailed design, construction, and operational stage in accordance with D3(12) of the London Plan and S8(14) of the emerging City Plan 2040.
167. Fundamental to the proposal is the creation of new public realm to enhance the pedestrian experience of Leadenhall Market and the wider

Conservation Area. The two key new facilities of the Public Hall and the Heritage Garden would, together, make this part of the City a more socially and economically inclusive place by providing two new gathering spaces for all at ground and fifth floor level.

168. The proposal, through the Public Hall and Heritage Garden, would deliver a series of welcoming, open, permeable, convenient, comfortable and legible public routes, encouraging pedestrian movement. It would maximise the amount of public open space, whilst building on the best townscape traditions of the City.
169. The proposal would resurrect an east-west through the site that was extinguished when the present building was constructed. This would run between Gracechurch Street and Lime Street Passage, easing pressure on the former in particular, and offering greater pedestrian choice. It would reopen a lost historic route (in accordance with policies DE4, S8 (1), AT1(4) of the emerging City Plan, GG1 of the London Plan and DM16.2 (6) of the Local Plan) and thereby enhance the network of human-scale courts and alleys which are so distinct to the City's character. It would do so through the animated, attractive, and lofty sequence of spaces which comprise the Public Hall, with the scale of the Gracechurch Street entrance, vestibule and then Hall increasing, then compressing again towards Lime Street Passage. As well as this fundamentally sophisticated spatial experience, the Hall would also be enlivened through a multitude of different uses and events programmed to complement but also provide a distinctive offering to Leadenhall Market.
170. The proposal's west elevation optimises active frontage by reintroducing openable bronze windows to the ground floor and widening the stone entrance surround, thereby maximising views of the retail unit in the entrance space, the lifts to the Heritage Garden and the Public Hall beyond. The proposal's east elevation, occupying a narrow slot between the Leadenhall Market buildings, offers an attractively arched and modelled triple-height entrance portal with compelling glimpses of the retail units and Hall beyond.
171. The public realm of the proposal would accommodate various uses, both day and night, with an innovative approach to servicing which would transform the main Public Hall from a servicing bay by night to a public open space surrounded by active uses and culturally programmable by day. York Stone and the specified City palette of simple, high-quality, durable materials would be used throughout to create seamless integration with the wider public realm, in accordance with the City Public Realm SPD and associated Technical Guidance.

172. The proposal would provide access for all across the site in a manner which is step-free and inclusive, without undue separation or hinderance. It is important that the elevations, external and part internal, in particular at ground levels but also from levels one to five, are well detailed to achieve the promised positive interfaces and active frontages, and these details would be reserved via condition. Security features have been integrated into the architecture, with discreet bollards and bespoke metalwork roller shutters to the west and east portals providing visually unobtrusive safety measures.
173. The architectural form of the proposal would, in respect of height, scale, massing and relationships with its neighbours, would sit comfortably at the western edge of the City Cluster, successfully mediating in scale between the Cluster's heart and 20 Fenchurch Street. It has been ingeniously designed to respond to this macro context and the smaller-scale, finer contextual grain of the conservation area below. The pale masonry facades, sculpted silhouette, reworked Gracechurch Street façade, neo-Romanesque Public Hall and extensive urban greening all represent an outstanding design response to both contexts, adding visual interest to the local townscape and wider skyline.
174. Overall, the proposal would optimise the use of land, delivering high quality office space, an exceptional Public Hall and a unique exhibition devoted to the Roman Forum-Basilica. It would improve the site's interfaces with and contribution to the 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 that the proposal would constitute Good Growth by design in accordance with Local Plan Policies CS10 and DM 10.1, emerging City Plan Policy S8 and DE2 and London Plan D3, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-6.

Heritage and Strategic Views

175. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13 and emerging City Plan 2040 policies S12 and S13 all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. It seeks to implement the Mayor's LVMF SPG, protect and enhance views of historic City Landmarks and Skyline Features and secure and appropriate setting and backdrop to the Tower of London. Policy S23 of the emerging City Plan 2040 seeks the same and takes into account the Tower of London World Heritage Site Management Plan (2016).

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

OUV and Relationship to Setting:

176. The proposed impact on the World Heritage Site (WHS) has been assessed against the seven attributes, and their components, of Outstanding Universal Value (OUV) contained within the adopted Statement of OUV. It is considered that all attributes of OUV draw on the contribution of setting for significance and an appreciation of it, but in particular the attributes: i.) an internationally famous monument ii.) landmark siting iii.) symbol of Norman power and iv.) physical dominance (of the White Tower); but as but to a lesser extent v.) concentric defences vi.) surviving medieval remains and vii.) physical (historical) associative evidence. The GLA have raised particular concerns regarding attribute ii, and this is addressed below.
177. Whilst the ToL comprises a scheduled ancient monument, various listed buildings and is in a conservation area (LB of Tower Hamlets), it is considered proportionate and robust, on the circumstances of the case, to consider the impact on OUV in order to draw a conclusion on the impact on these assets, with the exception of St Peter ad Vincula (Grade I), the impact on which it is considered necessary to assess as a designated heritage asset in its own right.
178. The WHS Management Plan establishes a 'local setting area', and 'immediate setting' and a non-spatially defined 'wider setting'. The proposal is not in the designated local setting (as identified in Fig. 4 of the WHS Management Plan) but is located in the much wider setting. The Local Setting Study identifies in section 7 those most representative views and/or viewing areas to and from the Tower of London (ToL) which are deemed to exemplify the OUV and the components, with management guidance providing a baseline for assessing change. The representative views/viewpoints overlap with some LVMF viewing locations, assessed together here for clarity.
179. The GLA have raised concerns regarding the loss of the relative prominence and status of the Tower through the expansion of the City cluster in these views, increasing its proximity and dominance and this is addressed below. It is important to note that the WHS Management Plan acknowledges the influence of the Cluster of tall buildings in signifying the City's commercial centre, stating (at para 2.4.25) that 'its visibility expresses the evolving political and cultural relationship between the Tower and the trading centre of the City of London'. It recognises that the Cluster has had an emerging distinct identity and the relationship between the ToL and the Cluster is long-established, having existed for over half a century, forming a backdrop in views, including over buildings in the Inner

Ward. In recognising the place of the Cluster in the wider setting it also acknowledges that it will intensify as a distinct and separate element to the ToL. At para 7.3.27, the Management Plan states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS, should consider (i) their effect on the established Cluster, (ii) the space between it and the ToL and (iii) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.

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

Impact on OUV/Significance:

181. The proposal would have an indirect impact, via change in the wider setting of the WHS. Change is not necessarily harmful. That change would be apparent in views including those from London Bridge, Queen's Walk, Tower Bridge and in and around the Tower of London.

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

182. This viewpoint is also identified as a Representative View in the Local Setting Study (LSS) (View 9), whilst the impact here is also representative of the impact from Approach 14 (Tower Bridge) in the LSS.
183. The LVMF SPG recognises this as a fine, broad river prospect, its character derived from its significant depth and width. It is the only designated River Prospect in which there are two Strategically Important Landmarks (SILs), St Paul's and the ToL. It allows the ToL, perhaps better than anywhere else, to be read as a significant part of the rich tapestry of London, where there is an acknowledged prominent relationship with the backdrop of tall buildings in the CoL (para 182).
184. The SPG states that an understanding and appreciation of the ToL is enhanced by the free sky space around the White Tower, and that where it has been compromised its visual dominance has been devalued. It states that the middle ground includes the varied elements of the City, rising behind the Tower, which includes prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as spires of City churches and the Monument. Other prominent buildings or structures in the background include the Canon Street Station towers, BT Tower, Centre Point and Tate Modern, which all combine to draw and hold the attention of the observer.

185. The visual management guidance anticipates the consolidation of the Cluster which, it is said, will add considerably to the character and stature of the view, and that any new skyline buildings must account for how they relate to skyline features (para 187). The guidance states that landmarks which enable an appreciation of the scale and geography of London should not be obscured by inappropriate development in the foreground, applying particularly to the Monument (para 185). The visual management guidance states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (para 186).
186. The GLA have raised specific concerns regarding views of the proposals infilling open sky between 20 Fenchurch Street and the City Cluster, which they find to detract from the appreciation of the WHS.
187. The proposal would be located at a significant distance to the west of the ToL, on the western edge of the Cluster. In the baseline situation, the upper levels of its south and eastern facades would form a prominent new presence between 20 Fenchurch Street and 1 Leadenhall; but located on the far side of the Cluster to the ToL, the impact on the wider setting of the ToL is negligible in this view. In the cumulative scenario, the proposal would be seen with the consented forms of 55 and 70 Gracechurch Street as part of a consolidated Cluster and having the same negligible impact on the wider setting.
188. Appearing at a considerable distance to the west from the focus of the ToL in the foreground, the WHS would not be obscured, distracted from or dominated. Given the intervening distance, siting, scale, form and appearance, the proposal would not harm those relevant attributes of OUV. It would leave unaffected those relevant components which form part of the LVMF visual management guidance – the physical form and visual dominance of the White Tower, the iconic sky-etched silhouette, the close relationship with the River Thames and the City beyond in the background, in accordance with the visual management guidance in the LVMF SPG (paras 183-186). The effect of the proposal (when considered alone) on this view, on OUV and on the setting and significance of the designated heritage assets, is considered to be minor and neutral, in the baseline and of a minor benefit in the cumulative scenario, in that it would assist in consolidating the Cluster as a more singular coherent urban form adding to the stature of the view. Accordingly, the proposal is not considered to harm the setting of the WHS or its OUV.
189. More widely, the siting, scale, form and orientation of the proposal would help to consolidate the Cluster and so make a positive contribution to the character and composition of the view, preserving an appreciation of identified landmarks, including preserving the

observer's ability to recognise and appreciate the relevant Strategically Important Landmarks – the ToL and St Paul's Cathedral – in accordance with London Plan Policies HC4, Local Plan policy CS13 and emerging City Plan 2040 Policy S13. It would not obscure an appreciation of the scale and geography of London, including the Monument, in accordance with the visual management guidance in the LVMF SPG.

190. The proposal would assist in the consolidation and development of the City Cluster of tall buildings in line with the visual management guidance in the LVMF SPG (para 57) and grow the character and stature of the view in line with the view specific visual management guidance.
191. Overall, the proposal would preserve and enhance the characteristics and composition of the view as a whole, preserving the characteristics and composition of the landmark elements, and a recognition and appreciation of the Strategically Important Landmarks. The proposal would not be intrusive, unsightly or prominent to the detriment of the view, and would ensure that the juxtaposition between elements, including the river frontages and key landmarks. It is in accordance with London Plan Policy HC4 and associated visual guidance in the LVMF SPG. The proposal would result in a minor enhancement to the view overall.

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

192. This view is also identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower and is also Representative View 10 in the LSS. The focus of the view is the ToL and a Protected Vista from 25A.1 focused on axis with the White Tower, which also benefits from a dynamically protected sky-backed silhouette between the Assessment Points (25A.1-3). The Monument and Tower Bridge are also identified as landmarks. The LVMF recognises the juxtaposition of built elements from a variety of eras as an aspect of the view (para 413). The visual guidance acknowledges the long-established presence of the consolidating City Cluster in the view which, alongside those historic landmarks, reflect over 900 years of London's development (para 410). The juxtaposition of the WHS with the modern city and of built elements from a variety of eras is deemed a central characteristic of the view (para 411/413), and its rich variety of landmarks including City Cluster towers such as the Gherkin and Tower 42.
193. In the baseline and cumulative scenarios, the proposal would be largely obscured behind 20 Fenchurch Street, occupying a small amount of sky space immediately to the east of it with a small amount of the upper

parts of its east elevation visible. The proposal's stepped, serrated silhouette and articulation of the crown would slot neatly into the gap between 20 Fenchurch Street and 1 Leadenhall Court, providing a pleasing adjunct to the simpler, geometric forms of these buildings. It would assist in the consolidation and development of the City Cluster of tall buildings in line with the visual management guidance in the LVMF SPG (para 57).

194. Given the pre-eminence of the River Thames in the foreground, the openness of the ToL ensemble defining its north bank, and the significant intervening distance between the ToL and the (largely screened) proposal, it is considered that the proposal would not undermine the composition or characteristics of the view, or of the landmark elements. The observer would continue to recognise and appreciate the ToL as the Strategically Important Landmark, set away from the City and not lost in it. In both baseline and cumulative scenarios, it is considered that the proposal would have a negligible impact on these views and would not result in any harm to the setting of the WHS or its OUV.
195. The siting, height, scale, sculpted massing and masonry detailing would comprise a high-quality design, set a significant distance away from the WHS, respecting the setting of the Tower and not dominating it, in accordance with the relevant LVMF visual management guidance (SPG paras 414-415). The proposal would not affect the fore/middle grounds of the views, or the close relationship with the River Thames and principal setting of this iconic view (SPG paras 416-417). It would not appear in the background, preserving the sky-backed Protected Silhouette of the ToL between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct, juxtaposed urban forms, in accordance with the visual management guidance (SPG paras 418-422) and relevant parts of the LSS. The proposal would preserve the relevant attributes of OUV and their associated components.
196. The proposal would assist in the consolidation and development of the City Cluster of tall buildings in line with the visual management guidance in the LVMF SPG (para 57) and grow the central characteristic of the view which is the juxtaposition of the modern city and the ToL WHS and of built elements of all eras.
197. Overall, the proposal would preserve and enhance the characteristics and composition of the view as a whole, preserving the characteristics and composition of the landmark elements, and a recognition and appreciation of the Strategically Important Landmark. The proposal would not be intrusive, unsightly or prominent to the detriment of the view, and would allow the observer to see specific buildings in conjunction with their surrounding environment. Thus it is in

accordance with London Plan Policy HC4 and associated visual guidance in the LVMF SPG. The proposal would result in a very minor enhancement to the view overall.

LVMF 11B.1-2 – River Prospect, London Bridge (Downstream):

198. This view is also identified as important in the WHS Management Plan and the Local Setting Study (Representative Viewpoint 11). The ToL WHS is identified as the sole Strategically Important Landmark, whilst Tower Bridge and HMS Belfast are identified as other landmarks.
199. The proposal would appear at the western extremity of these views. In the baseline situation, the upper floors of the southern elevation are seen in front of Tower 42, appearing prominently alongside the western elevation of 20 Fenchurch Street, providing a sculpted, masonry form that would contrast appealingly and assisting in subduing its bulk. It would be positioned so far away from the ToL and other landmarks in the view that its presence would have a negligible effect on their settings. In the cumulative scenario, the proposal would be entirely occluded behind other consented developments to the south, notably 70 and 55 Gracechurch Street. There would therefore be no impact in the cumulative situation.
200. Given the pre-eminence of the River Thames in the foreground, and the significant intervening distance between the ToL and the proposal, sited as it is on the western periphery of the Cluster, it is considered that the proposal would not undermine the composition and characteristics of the view, or its landmark elements. In both the baseline and cumulative scenarios, it would preserve the observer's ability to recognise and appreciate the ToL as the Strategically Important Landmark.
201. Given its siting, the proposal would not affect the clear sky backdrop of the White Tower, and would not impose itself on it, having a neutral impact on and thus preserving all those relevant attributes of OUV and those associated components – preserving the relationship with the River, the City, and the iconic form, silhouette and 'dominance' of the White Tower. It would not be harmful to the view, setting or significance of the ToL WHS or its OUV.
202. Overall, the proposal would preserve and enhance the characteristics and composition of the view as a whole, preserving the characteristics and composition of the landmark elements, and a recognition and appreciation of the Strategically Important Landmark. The proposal would not be intrusive, unsightly or prominent to the detriment of the view, and would allow the observer to see specific buildings in conjunction with their surrounding environment. It is in accordance with

London Plan Policy HC4 and associated visual guidance in the LVMF SPG. The proposal would result in a minor enhancement to the view overall.

Other World Heritage Site Views:

203. The Local Setting Study (section 7) identifies Representative Views which are deemed to best exemplify the OUV of the ToL. It provides an analysis of the character of these views as a baseline against which change can be assessed. The proposal would impact on views from the Inner Ward and from the Inner Curtain Wall (North and South); the representative impact is to be found in submitted THVIA views 13A-C, in addition to views 10-12 from Tower Bridge Approach and Tower Wharf.

Inner Ward:

204. These views are deemed by the Local Setting Study to illustrate well the ToL's significance as the setting for key historical events and the relationship and scale of surrounding palace buildings of the Inner Ward. It aims to maintain views illustrating the living tradition of the ToL, its rich ceremonial life and unique sense of place set apart from the modern city outside the walls, where the relationship between the scale of individual buildings can be appreciated. Under 'key issues' it states tall buildings *could*, and so not in principle *would*, detract from that unique sense of place apart from the modern city and/or could affect the scale of the enclosing historic buildings. The associated 'Objectives and Guidance' states that development should (i) respect that sense of place and (ii) ensure the buildings surrounding the Inner Ward remain the focus of the view.
205. The LSS states that there is a range of views from within the Inner Ward; these have been assessed in the three-dimensional model, in addition to the submitted HTVIA views. In the baseline scenario the proposal would, from a significant part of Tower Green and the Scaffold Site, be concealed behind the western range of enclosing buildings, having no visual impact. From the very eastern and south-eastern edge of this area, near the head of the steps down to the Bloody Tower, the upper stages of the proposal would appear behind the Chapel of St Peter ad Vincula and, from certain viewing points, engaging with its bell tower. This would be a fleeting impact, perceptible only from a smaller quantum of the viewing area; moving toward the Chapel, in its immediate setting from the Green, the proposal would move out of view and leave the ensemble unchallenged and still pre-eminent. The effect would be the same in the cumulative scenario, though with the

proposal a little less prominent due to the presence of other consented schemes such as 50 Fenchurch Street, where it would firmly be read as part of the consolidating singular Cluster form, set away at some distance from the compelling and arresting foreground setting at the heart of the medieval palace complex and its rich traditions.

206. It is considered, then, in accordance with the guidance in the LSS, that the proposal would (i) respect the unique sense of place and the pre-eminent stage in which those rich traditions would continue to take place and (ii) allow those enclosing Inner Ward buildings to remain the focus of the observer. It is further considered that the iconic, strategic landmark siting and dominance of the White Tower would be unchanged, in terms of the overarching attributes of OUV and their components, while the relationship between the ToL and the City beyond would be maintained, the proposal being a proportionate addition to the emerging Cluster as a distinct, long-established backdrop entity, set away from the ToL, which would not be lost within it.

Inner Curtain Wall (South):

207. The LSS recognises that these views are a 360-degree experience where the aim is to maintain an appreciation of the ToL as a riverside gateway, an appreciation of the historic relationship between the ToL and the River and, whilst under the associated guidance, seeking to maintain the White Tower as the key focus to the north, appearing more dominant than buildings in the Inner Ward or those beyond.
208. In the baseline scenario, the upper stages of the proposal would be clearly visible above the Beauchamp Tower, occupying clear sky space to the north of 20 Fenchurch Street, between it, 1 Leadenhall and the Cluster beyond. The sculpted, tiered south and east elevations and the refined crown of the proposal would provide a complementary form to the simple geometric forms of the other Cluster buildings; moreover, the proposal would be considerably lower than them, positioned as a mediating step in height. In these respects, the proposal would assist in consolidating the Cluster's distinct singular urban form and separate, long-established identity, more so in the cumulative scenario when it would be perceived as nestling amongst other consented schemes such as 70 Gracechurch Street and 50 Fenchurch Street.
209. In both scenarios, the White Tower, accentuated by its massive, fortified walls, would remain the focus of the view. It would continue to dominate that part of this 360-degree viewing experience, with the Cluster a distant subservient entity beyond; whilst the proposal would not intrude into the other vantages of this viewing experience,

preserving the essential relationship between the ToL and the River and an appreciation of it as a historic gateway.

210. It is considered that those identified relevant attributes and components of OUV would be preserved, and the visual management guidance in the Local Setting Study complied with.

Inner Curtain Wall (North):

211. The LSS acknowledges that this is a 360-degree experience and demonstrates a 'clear contrast between the historic Tower and the modern city outside its walls'. The identified aim is to (i) maintain views that reveal the relationship between the Tower and the City and (ii) maintain an appreciation of the defences as an outstanding example of concentric castle design. Under 'Key Issues' the LSS recognises that future tall buildings *could* reduce the perceived prominence of the Tower in its setting, stating that such buildings, under the associated guidance, should continue to reveal the historic relationship of the ToL and the City to the north and that clear views of the concentric curtain walls should be preserved.
212. Sited a considerable distance to the west in these views, in the baseline scenario, the upper stages of the proposal would appear prominently in the sky between 20 Fenchurch Street and 1 Leadenhall. The sculpted, tiered south and east elevations and the refined crown of the proposal would provide a complementary form to the simple geometric forms of the other Cluster buildings; moreover, the proposal would be considerably lower than them, positioned as a mediating step in height. In these respects, the proposal would assist in consolidating the Cluster's distinct singular urban form and separate, long-established identity; more so in the cumulative scenario, when it would be perceived nestling amongst other consented schemes, although the proposal would begin to be occluded by the consented form of 50 Fenchurch Street, lowering its prominence in the view.
213. In both scenarios, the proposal would appear on the western side of the established Cluster, consolidating its distinct form, whilst preserving that relationship with the ToL, and preserving the pre-eminence of concentric defences in these views, all in accordance with the guidance.

Other Views of the ToL:

214. Other views have been provided which are not identified as strategic views in LVMF or as views in the Local Setting Study but which

demonstrate the attributes and components of OUV where there would be a relationship with the proposal. The view from the riverside walkway of Tower Wharf, looking west, demonstrates the relationship between the emerging City Cluster in the background and the ToL which towers over the immediate foreground. In this view, the proposal would reinforce the relationship between the two distinct urban forms – the Cluster in the background and the ToL ensemble continuing to dominate the foreground, causing no harm.

Conclusion – Impact on the Tower of London World Heritage Site:

215. The proposal would preserve the ability to recognise and appreciate the ToL as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF as it relates to OUV.
216. It is acknowledged that HE found minor harm to the WHS, albeit did not object on these grounds. Officers attribute considerable importance and substantial weight to the views of HE as the Government's advisor on the conservation of the historic environment. However, for the reasons set out in the detailed assessment, officers disagree that the proposal would cause harm. The scale of change in all instances is considered to be between negligible and minor, the magnitude of impact small, in both baseline and in particular in cumulative scenarios. In all instances, the proposal is not considered to harm the attributes of the OUV, the authenticity or integrity of the WHS, and to preserve its significance. While the concerns of the GLA are acknowledged the proposal has been designed to read as part of the consolidating singular form of the Cluster, as part of a long-established backdrop to the ToL ensemble which has been curated by consistent decision-making on behalf of the strategic and local planning authority for the best part of half a century. Therefore, proposal would not harm the significance of the ToL, whether in relation to the WHS or any of the component heritage assets which comprise it.

Other London View Management Framework Impacts:

217. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the Capital's identity and character at a strategic level.
218. The site is in the City Cluster of tall buildings, which the LVMF SPG visual management guidance seeks to consolidate to reinforce its long-established positive role on the skyline of the Capital (paras 57 / 87 / 129 / 130 / 144 / 146 / 187). It is considered that the Cluster aids the

observer's appreciation of the wider geography of London as a recognisable and important landmark. Officers consider it symbolises the historic commercial and economic heart of the Capital, important in reading the wider socio-economic and cultural topography of London.

219. Being in the City Cluster of tall buildings, the proposal is sited to avoid breaching designated Protected Vistas towards Strategically Important Landmarks (SILs), including of St Paul's and the Tower of London (ToL). However, it would be visible from several identified views, in particular the River Prospects.

London Panoramas

220. The proposal would be visible, to the discerning, focused eye and/or through use of magnification, from all the London Panorama Assessment Points.
221. In all instances the City Cluster, or component elements of the Cluster, which the guidance seeks to consolidate (para 57, for example), is either identified as a landmark element or other feature of the view.
222. 1A.1-2, Alexandra Palace Viewing Terrace, is an iconic broad and deep panorama from the northern suburbs back across the Thames basin and towards Central London. The visual management guidance (para 85) identifies the Cluster as a distant focal point allowing for orientation. The proposal would be discernible as part of the consolidation of the City Cluster, assisting in the process of visually ameliorating the isolated bulk of 20 Fenchurch Street into a more coherent singular urban skyline form. This would support the aim of para 87 that new tall buildings consolidate and improve the composition of existing clusters of tall buildings, sharpening the distinction between the lower density residential of the mid-ground and background higher density character of central London. In consolidating this townscape element, in line with para 90, the proposal would manage the transition down to St Paul's Cathedral as the SIL, releasing growth pressure on the intervening unspoilt distant horizon of the Surry Hills (South London) and on a clear day, the North Downs, thus preserving and enhancing the viewer's ability to recognise and appreciate St Paul's. The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG. The proposal would result in a very minor enhancement to the view overall.
223. 2A.1-2 and 2B, Parliament Hill from the summit and east of, is another famous strategic panorama of London from one of its best-known peaks. As at Alexandra Palace, given the wide span and depth, the consolidation of significant tall buildings into clusters assists the viewers orientation, understanding and ultimately appreciation of the view.

224. The siting of proposal in the City Cluster means there would be no impact on the three Protected Vistas towards the two SILs, St Paul's and the Palace of Westminster. It is a good place to appreciate the City Cluster's emerging conical form, both picking out the individual silhouettes and as part of a consolidating singular identity and coherent urban skyline form. In baseline and cumulative scenarios, the proposal would assist in assimilating the isolated bulk of 20 Fenchurch Street into a discreet identity for a place of London-wide and National importance. Para 96/106 recognises the contribution of the City Cluster demarcating the financial district and governmental centre of London. As identified (para 97), like the Shard on the opposite side of London Bridge, the Cluster assists the observer in recognising and isolating St Paul's, whilst the consolidation of tall buildings allows the for an appreciation of it in its wider backdrop of the rolling Surrey/Kent hills and its prominent place in the wider Thames basin, which the guidance identifies as framing the silhouette of the city (para 96). The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG. The proposal would result in a minor enhancement to the view overall.
225. 3A.1, Kenwood at the viewing gazebo, is another Hampstead Heath view from of the finest historic homes in North London. Given the pre-eminence of the gentle and verdant fore and middle ground of the Heath, an appreciation of the great depth of an otherwise framed view of central London is dependent on tall built form breaking the distant North Downs. As such, the City Cluster is a strong orientation point and complementary feature in an appreciation of the composition and characteristics of the view. The siting of proposal in the City Cluster means there would be no impact on the Protected Vista towards St Paul's, or on a recognition or appreciation of the Palace of Westminster as the other SIL.
226. The proposal would assist the consolidation of the conical City Cluster as a distinct and coherent urban skyline form, assisting in drawing out that arresting contrast between the semi-rural parkland and the modern commercial core of central London rising above and beyond, as identified in the visual management guidance (para 116). It would assist in assimilating the isolated bulk of 20 Fenchurch Street into the dense clustering of more rectilinear towers, as identified at para 117, whilst in breaking the distant Downs allowing the observer to orientate and, to the right, assist in recognising and appreciating St Paul's as the SIL, especially since it is backdropped by the Shard, just the other side of London Bridge. The consolidation of tall buildings here frees the wider backdrop hills to accentuate an appreciation of St Paul's and its strategic location in the wider Thames Basin (para 121). The distinction of a singular Cluster form avoids the visual confusion caused by ad-hoc tall buildings which undermines the recognition and

appreciation of the Palace of Westminster (para 118). The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG. The proposal would result in a very minor enhancement to the view overall.

227. 4A.1-2, Primrose Hill summit, is a small foothill in the initial climb up the North London hills, it is a popular destination just north of Regent's Park affording a spectacular panorama of central London seen in close detail. The siting of proposal in the City Cluster means there would be no impact on the two Protected Vistas towards St Paul's and the Palace of Westminster, the SILs.
228. The City Cluster is identified as a complementary feature of the view, where it is identified as somewhat screened by towers at Euston (para 129), standing in contrast to the lack of order or coherence of the mix of larger commercial and residential buildings in the middle ground (para 128). The proposal would assist in consolidating the clear conical City Cluster form, assisting in the assimilation of the isolated bulk of 20 Fenchurch Street into a singular coherent skyline form. This would assist the composition of the view, consolidating an existing landscape feature in accordance with para 130 of the SPG. This will assist in differentiating it from the consolidating Isle of Dogs Cluster in the background, assisting in an appreciation of the scale and depth of London. The proposal would assist the stepping down of the Cluster towards St Paul's, whilst assisting in the preservation of the sky gap and appreciation of the distant wooded hill horizon line which reinforces a recognition and appreciation of St Paul's. The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG. The proposal would result in a minor enhancement to the view overall.
229. 5A.1-2, Greenwich Park General Wolfe Statue, is a seminal London view of great historical significance allowing one of the most comprehensive views of the Capital. The siting of proposal in the City Cluster means there would be no impact on the Protected Vista towards St Paul's as the SIL (5A.2).
230. This is a broad and rich panorama allowing a full appreciation of London as a great historic port city focused on the River Thames, with the exceptional foreground formal classical landscape of the Royal Naval College in dramatic juxtaposition with the consolidating Docklands Cluster beyond. The SPG recognises that this offers layering and depth to the view (para 144). The Thames meanders back to central London, announced by the City Cluster, which is an important orientation point for the observer in the recognition of St Paul's. The proposal would assist in consolidating the singular Cluster skyline form, assisting in assimilating the isolated bulk of 20 Fenchurch Street, while stepping down towards it and the centrepiece composition

of St Paul's, Tower Bridge and the Monument, appreciated in part against the distant Highgate/Hampstead ridgeline. The proposal would accord with para 146 of the SPG, which recognises that the composition would benefit from the further incremental consolidation of the City Cluster of tall buildings, consistent with the general want to consolidate tall buildings at para 57, avoiding more sensitive aspects of the wider view and allowing for greater understanding of the wider landscape setting of London. The proposal would result in a minor enhancement to the view overall.

231. 6A.1, Blackheath Point, is on high ground of historic strategic importance on high ground on the historic route from the Kent coast and the continent and would have been the first site of the skyline of the Capital. The siting of the proposal in the City Cluster means there would be no impact on the Protected Vista towards St Paul's as the SIL (6A.1). As at Greenwich, it would assist in the consolidation of the City Cluster as a coherent skyline form assisting the composition and characteristics of the view overall. The proposal would result in a very minor enhancement to the view overall.

LVMF River Prospects:

LVMF 15B.1-2 – River Prospect, Waterloo Bridge (Downstream):

232. This is an iconic London view. St Paul's Cathedral is identified as the SIL. It is considered that the proposal would complement the development of the emerging City Cluster as a singular, coherent entity on the skyline. In both the baseline and cumulative scenarios, it would have a minor impact on the character and composition of the view, standing amidst 1 Leadenhall, the Scalpel and the Willis Building; with its pale masonry architecture and sculpted silhouette, it would add pleasing contrast and diversity to these simple glazed forms of the other familial Cluster buildings. The height of the proposal is appropriate to the site, appearing as a lower, mediating influence between the apex of the Cluster to the north and 20 Fenchurch Street to the south. Stepping down in height from the Cluster apex, towards the scale of the River, and of a high-quality design, the proposal would accord with para 263 of the SPG guidance.
233. The proposal would not draw tall buildings closer to St Paul's Cathedral, would not affect its clear sky backdrop and would not dominate or cause a 'canyon effect' around the Cathedral, in accordance with guidance in paras 264-267 of the SPG. It would not obscure or detract from any identified landmark element in the view and would give further context to those relevant Cluster landmarks identified. It would consolidate the City Cluster in accordance with para

57 of the SPG. The proposal would result in a modest enhancement to the view overall.

LVMF 16B.1-2 – River Prospect, the South Bank: Gabriel’s Wharf Viewing Platform:

234. St Paul’s Cathedral is identified as the SIL. The proposal would complement and contribute to the development of the existing and emerging Cluster of tall buildings, drawing in 20 Fenchurch Street, preserving and enhancing the townscape setting of St Paul’s whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 280-283 and 57 of the SPG. The proposal would result in a minor enhancement to the view overall.

LVMF 17B.1-2 – River Prospect, Golden Jubilee/Hungerford Footbridges (Downstream):

235. St Paul’s Cathedral is identified as the SIL. Here, again, the proposal would consolidate the form of the Cluster, stepping down in height from its apex towards the River. Accordingly, it would preserve a recognition and appreciation of St Paul’s, strengthening the composition and coherent urban form of an existing tall building Cluster, and would not obscure or detract from a landmark feature, according with the visual management guidance in paras 301-305 and 57 of the SPG. The proposal would result in a minor enhancement to the view overall.

LVMF 18B.1-2 River Prospect, Westminster Bridge (Upstream):

236. Westminster City Council requested assessment of this view, illustrated in Appendix E of the HTVIA at views A18 and A19. The modelling provided shows the proposals will not be visible from these viewpoints.

LVMF 19A.1-2 River Prospect, Lambeth Bridge (downstream):

224. The focus of the view is the Palace of Westminster, the SIL, alongside other landmarks including Westminster Abbey, Victoria Tower Gardens, Whitehall Court, the London Eye, Westminster Bridge and Lambeth Palace, whilst 30 St Mary Axe (the Gherkin) and Tower 42 in the City Cluster as also identified as positive features. The visual guidance describes the juxtaposition between the greater intensity of buildings north of Westminster Bridge and on to the CoL as secondary to the ‘semi-pastoral’ setting of the World Heritage Site (para 332), while the

distant Cluster makes for a deep view (para 333), allowing for a strong appreciation of the geography of London, and a juxtaposition between the political and commercial centres of the Capital.

225. The proposal would assist in the consolidation of the City Cluster and the assimilation of the isolated bulk of 20 Fenchurch Street into a coherent singular skyline form with a stronger identity, in accordance with the aim to consolidate existing clusters in the visual guidance (para 57). In the kinetic experience between A.2-1, the Cluster would track in behind the informal picturesqueness of the chimneyscape of Lambeth Palace in a pleasing and subtle manner, allowing the composition and characteristics of the landmark to remain pre-eminent. It would accentuate the composition and characteristics of the view, in particular, that subtle juxtaposition between the semi-pastoral fore and middle ground and the distant financial distinct, allowing a greater appreciation of the topography of London.
226. In accordance with the visual management guidance the proposal would respond positively to the characteristics of the river fronting buildings and enhance the composition of the view and the status of all landmark elements (para 334). This is in accordance with the anticipation of the visual guidance, which anticipation the consolidation of the City Cluster (para 338) and a recognition and appreciation of the SIL would be preserved. It is considered the proposal would result in a minor enhancement of the view overall.

Summary of LVMF Impacts

227. The proposal would not harm, and would make some positive contributions to, the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the Strategically Important Landmarks, in accordance with London Plan Policy HC4, Local Plan Policy CS13(1) and emerging City Plan 2040 Policy S13.

City of London Strategic Views:

Monument Views

228. As contemplated by Local Plan policy CS13, 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. The proposals have been designed, in terms of siting, height and appearance, to preserve views of and from the Monument.

Views from the Monument

229. The proposal is not sited in the Monument Views Policy Area and is outside the field of view of identified Views 1-5 from the Viewing Gallery, which would be preserved.
230. Para 4.14 of the Protected Views SPD addresses 'Northern Views' from the Viewing Gallery and states that proposed increases in height near the Monument will be assessed in terms of their impact on views to and from the Monument. The principal axial views are identified as being provided by King William Street and Gracechurch Street/Bishopsgate as leading the eye, respectively, into the Bank Conservation Area and western fringe of the City Cluster.
231. The proposal would allow an unbroken view north along Gracechurch Street/Bishopsgate towards Gibson Hall. The proposal would read as part of the consolidating Cluster, enhancing an appreciation of the contrast between the Bank Conservation Area and the Cluster. It is considered that the proposal would enhance the view; albeit in the cumulative scenario, the proposal would be obscured by the consented form of 55 and 70 Gracechurch Street.

Views of and Approaches to the Monument

232. The proposal would not be in the 'Immediate Setting' of the Monument, as defined in the Protected Views SPD (Figure 8), leaving it preserved in accordance with the guidance at paragraphs 4.16-17 of the SPD. The proposal would be in its near setting and visible in some of the identified Views along Street Axes.
233. In views on approach from Princes and King William Streets, the proposal would be peripheral to the viewing experience of the Monument, situated at a distance to the east of the principal (semi-formal) orientation of the view SE along King William Street, where the Monument's sky silhouette and skyline setting would be unaffected. No harm would be caused and the proposal in accordance with paragraphs 4.19-21 of the SPD.
234. In views from Tower Bridge (along Monument Street axis, the proposal would be viewed as part of the consolidating Cluster, remote and at a distance from the orientation of the view along Monument Street in which the skyline setting of the Monument rising out of the Custom House would be unaffected. From Monument Street itself, the proposal would not be visible, allowing adequate space to recognise and appreciate the Monument. No harm would be caused and the proposal in accordance with paragraphs 4.22-23 of the SPD.

235. The SPD identifies the approach to the Monument from Gracechurch Street, from the junction with Lombard Street in particular down to the junction with Eastcheap. From this section the proposal would be behind the observer with no direct intervisibility. From further back up Gracechurch Street / Bishopsgate, the proposal would be read as part of the City Cluster and at no point would it obscure or otherwise detract from the emerging kinetic view of the Monument. No harm would be caused and the proposal in accordance with paragraphs 4.24-25 of the SPD.
236. In views looking north from Queen's Walk, on the original alignment of the Old London Bridge, the proposal would appear as part of the Cluster to the north-east, firmly part of the modern development in the background. The proposal would leave the Monument's skyline presence undiminished. No harm would be caused and the proposal in accordance with paragraphs 4.26 of the SPD.

Conclusion on the Monument:

237. In summary, the proposal has been designed to protect and enhance significant local views of and from the Monument, thus protecting their contribution to the overall heritage of the City, in accordance with Local Plan Policy CS 13 and associated guidance in the Protected Views SPD.

St Paul's Viewing Points:

238. The proposal would not be visible and would be out of scope of most of the identified Viewing Points of St Paul's identified in the Protected Views SPD (Figure 3). It would be visible in the kinetic riparian sequences along the Thames bridges and from the South Bank Queen's Walk, in particular in those orientated towards the Cathedral between Hungerford and Millennium Bridges.
239. The proposed height and form of the tower has been designed around the strategic heritage consideration of the processional approach to the Cathedral from Fleet Street and to consolidate a coherent Cluster form in those strategic riparian views in line with LVMF visual guidance.
240. From the Processional Route the envelope and been designed to avoid any erosion of sky silhouette and space afforded to the Cathedral, thus ensuring its pre-eminence in this viewing experience of state and royal significance.
241. From the Thames bridges and South Bank the proposal has been designed to contribute to the stepping down from the summit of the

Cluster at 22 Bishopsgate/1 Undershaft and to continue the process of assimilating the isolated bulk of 20 Fenchurch Street, bringing it into a singular coherent cluster form on the skyline.

242. The proposal would be visible from the Stone and Golden Galleries of St Paul's Cathedral. The Protected Views SPD seeks special attention be paid to the roofscape surrounding the Cathedral. The proposal would not affect the surrounding roofscape of the Cathedral.
243. Overall, the proposal has been designed to protect and enhance local views of St Paul's Cathedral, its setting and backdrop, in accordance with Local Plan Policy CS 13(2) and associated guidance in the Protected Views SPD and LVMF SPG.

Views from other publicly accessible elevated viewing area, in particular the 'Sky Garden' at 20 Fenchurch Street

244. The Sky Garden is a popular public viewing gallery and visitor attraction offering 360-degree views of London. This public benefit was integral to the planning balance in the Secretary of State's decision on the 20 Fenchurch Street planning application. The impact on it as a public attraction and sensitive receptor is a material consideration.
245. The viewing experience offers a unique, 360-degree experience over different levels along a perimeter walk, with a large south-facing external terrace. Due to its siting to the north, the proposals would not impact the open experience of the south terrace, or the quality of the microclimate. The impact would be to northerly views of the Cluster from within the glazed enclosure to the northern side of the building and set back behind the external horizontal bracing structure. From this view point the upper levels of the proposals are seen, alongside the crown of Tower 42 and the emerging cluster. The cumulative scenario shows the proposals forming part of a crescendo towards the centre of the cluster, creating a balanced composition. The proposals are therefore considered to preserve the public enjoyment in views from the Garden. It should be noted that Leadenhall Market is not visible within these views, due to its proximity to the viewpoint and the position of the bracing structure which prevents complete views to the ground from this side of the building.
246. From the rooftop garden at 120 Fenchurch Street, the proposal would appear as a prominent new form alongside 1 Leadenhall Court, its sculpted form and pale masonry architecture providing a foil to the simple glazed geometry of its neighbour. The slender form of the proposal would preserve views of St Paul's Cathedral and allow the two to be read together; it would be possible to perceive how the Processional Route views have shaped the upper parts of the proposal.

Views of other notable landmarks in the view such as the Lloyds Building and St Michael Cornhill would be preserved.

247. From the viewing gallery at the Blavatnik Building within the Tate Modern the proposals will appear within the City Cluster, situated between the Leadenhall building and 52-54 Lime Street. The proposal will consolidate the form of the Cluster, resolving the current 'missing tooth' effect between the buildings noted above. Views towards the central brick tower of the Tate modern will be preserved. When the cumulative scheme is considered, this effect will be enhanced, seen together with 1 Leadenhall Street and 70 and 55 Gracechurch Street. The visual amenity of the viewing gallery is therefore considered to be preserved.

248. The emerging terrace at 1 Leadenhall Court was designed as a raised public space for appreciating the roofscape of Leadenhall Market. The proposal would complement that function and signpost another exciting new civic space in the Cluster. The proposal's potential to reduce the clutter of associated plant on the roof of the market over time, would enhance this experience. The views west towards St Paul's and Bank would be unaffected.

Other Borough Strategic Views:

London Borough of Lambeth Local Views:

249. Adopted Local Plan Policy Q25 (Views) designates a series of Panoramas, Landmark Silhouettes and Roofscape Views which are of local interest. It seeks to protect their general composition and character from harm. Further visual management guidance is contained in a draft Local Views SPD. The Local Views of relevance here are: i.) . views NNW from Brockwell Park to (a) Lambeth Town Hall's tower and (b) St Matthew's Church tower; and (c) views N and NNE to the city ii.) View NNE from Norwood Park (across LB Southwark) to the city iii.) View N from Gipsy Hill (across LB Southwark) to the city iv.) View N from Knights Hill (across LB Southwark) to the city v.) View N and E from Royal National Theatre terraces to the North Bank of the Thames including St Paul's Cathedral and vi.) View NE from the Queen's Walk to St Paul's Cathedral between Waterloo Bridge and borough boundary with Southwark.

250. In the distant panorama views (I-iv) the distant City is seen as a positive orientation point, whilst St Paul's Cathedral and the City Cluster are identified as positive landmark elements, where the consolidation of tall buildings in the centre is deemed to likely enhance the view by adding to

the richness of the cityscape. Their importance in understanding the physical and cultural topography of London is acknowledged in the statement that further distant tall buildings will reinforce the landmark status of the distant city. This importance is recognised in the approach to prevent development in the foreground or middle ground from blocking views of St Paul's and the City Cluster. From here the logic of the strategic siting of the Cluster is clear, with sufficient distance between it and the Cathedral, allowing for their appreciation on the skyline as core compositional elements. The visual guidance is at ease with the juxtapositions of the old and new, and at the core of view (iv) the striking juxtaposition of the Church tower of St Lukes and the distant City Cluster beyond is deemed at the core of the interest in the view, seeking to protect this essential visual contrast. The proposal would assist in consolidating the clear conical form of the Cluster and the richness of the cityscape and its visual juxtaposition in these views and would be an enhancement.

251. In terms of v.) and vi.), from the South Bank towards St Paul's Cathedral, the proposal would, on the whole, be out of view, given the significant screening effect of foreground buildings/trees, preserving an appreciation of the Cathedral as the main skyline landmark. It would assist in consolidating the overall Cluster form to calm its appearance in contrast to the Cathedral. The proposal would thus preserve and enhance these views.
252. Overall, it is considered the proposal would protect (and enhance) the general composition and character of these Local Views.

London Borough of Southwark:

253. Adopted Southwark Plan Policy P22 seeks to preserve and enhance Borough Views of significant landmarks and townscape, enhancing the composition of the panoramas across the Borough and central London as a whole. This comprises five designated views, four of which are towards the CoL and three of which are focused on St Paul's Cathedral. The proposal would not be visible in View 2 (the linear view of St Paul's Cathedral from Nunhead Cemetery), View 3 (the linear view of St Paul's Cathedral along Camberwell Road) or View 5 (the townscape view south from the centre of Millenium Bridge). These would be preserved.
254. In terms of the panorama from View 1 (One Tree Hill), it is deemed one of the best views of Southwark in the context of London from one of its highest points. St Paul's is the Strategically Important Landmark (SIL), benefitting from a Protected Vista. the description/visual guidance at Appendix 4 of the Southwark Plan, identifies the north London hills

framing the silhouette of the city, with other prominent complementary elements the tall buildings at Blackfriars Road, the Elephant, the City of London and at London Bridge, where it finds the Shard assist in the viewers orientation and in their recognition of St Paul's in the wider panorama. The other CoL landmarks include the City Cluster and the Barbican, whilst the framing of the North London hills a positive feature. The strategic siting of the City Cluster would maintain the view of St Paul's and not compromise the Wider Setting Area, the space between them preserving an appreciation of the important backdrop North London hills which benefit an appreciation of its strategic siting and silhouette, and an attractive compositional feature in its own right. It would preserve a recognition and appreciation of Barbican trio of silhouetted in composition against those hills, demarcating one of Europe's premier cultural centres. The proposal would assist the consolidation of 20 Fenchurch Streets isolated bulk into a more coherent City Cluster form in line with the guidance to consolidate and improve the composition of emerging tall building clusters, allowing for less distraction from and greater recognition of St Paul's in the view as a whole, whilst reenforcing that juxtaposition between the prevailing geographies of London and pattern of buildings.

255. View 4 (King's Stairs Gardens, River Prospect) is identified as a characterful view of some of London's most famous landmarks including Tower Bridge, St Paul's Cathedral and the River Thames. This is amongst other contributing landmarks including 20 Fenchurch Street and the City Cluster in an undulating skyline with a clear narrative demonstrating London's development as an internationally important mercantile city of commerce. The proposal would be visible and would assist in consolidating the City Cluster as a strategic landmark element, demarcating the historic commercial core of London, reinforcing its influence in the composition, alongside the London Bridge cluster, in framing the viewers orientation on those key landmarks, Tower Bridge and St Paul's (and to a degree, the Monument), enhancing their recognition and appreciation in the composition as the 'gateway' to a great historic riparian city. It would reinforce that prevailing historic pattern and scale of buildings either side of the River, stepping up to the centre and historic and commercial core of London with tall buildings clusters set back from the Thames in line with the visual guidance. Overall, the proposal would preserve and enhance the composition of the view, and of significant landmarks and townscape, ensuring the River Thames and its frontage, Tower Bridge and St Paul's are maintained in the view in accordance with P22.

256. In summary, the proposal would preserve Borough Views 1-5 and enhance Views 1 and 4, in accordance with Southwark Plan Policy P22 and the visual management guidance contained in Appendix 4.

London Borough of Islington:

257. Adopted Islington Development Management Policies Policy DM2.4(B) identified local protected views of St Paul's Cathedral and St Pancras Chambers and Station, which it seeks to protect and enhance. These comprise Views LV1-LV8. The proposal would not be visible in views LV1, 2, 3, 6 or 8, which would be preserved.
258. From Views LV 4-5, from Archway Road/Bridge, provide good panoramas of central London from an elevated position on rising hills along a principal artery and historic arrival point to London. The strategic siting of the City Cluster is clear, set away from St Paul's which would not be impinged upon. Where the Cluster is visible behind the rich foliage framing these views, it draws the attention of the viewer to the location of the City and commercial core of London, assisting in their recognition of St Paul's within the wider panorama. The same applies to Dartmouth Park Hill, view LV 7.
259. Overall, the proposal would protect Views 1, 2, 3, 4, 6 and 8, while protecting and enhancing View 4, 5 and 7, in accordance with Policy DM 2.4.

City of Westminster:

260. Adopted Westminster City Plan 2019-2040 Policy 40(F) (Townscape and Architecture) states that new development affecting strategic and local views (including views of metropolitan importance) will contribute positively to their characteristics, composition and significance and will remedy past damage to these views where possible. Whilst in draft, the Metropolitan Views SPD (2007) is understood to contain those local metropolitan views. Of the 45 identified, the proposal would be prominent from 2, V42(B) (Waterloo Bridge, downstream) and V43 (Hungerford Bridge, downstream), whilst being visible from V25 (Lambeth Palace from Lambeth Bridge), albeit less prominent. From V21 (St Paul's Cathedral from Victoria Embankment outside Somerset House), V22 (Dome of St Paul's from Somerset House River Terrace) and V34 (Horse Guards and Whitehall Court from St James' Park) the proposal may have some imperceptible (de minimise) visibility when trees are not in leaf, of no consequence, leaving these views preserved.
261. The downstream views from Hungerford and Waterloo Bridges correspond with the LVMFs and local CoL St Paul's Viewing Points addressed elsewhere in this report. The Metropolitan Views SPD

describes them as dominated by the City's financial district, with St Paul's remaining of central importance. This aspect would remain unchanged and as set out elsewhere in this report, the proposal would preserve the setting of St Paul's by consolidating the City Cluster's distinct and separate skyline form, strengthening the overall composition. It would be a modest enhancement of the views overall. In View 25, from Lambeth Bridge, the SPD recognises the relationship between the low picturesque outline of Lambeth Place being enjoyed with distant building including the Natwest Tower (Tower 42) - a situation which has been enhanced with the consolidation of the City Cluster. The proposal would assist in further consolidation and the assimilation of 20 Fenchurch Street into a more coherent Cluster form whose juxtaposition, intermingling amongst the chimneyscape of the pre-eminent Medieval palace, would enhance the picturesque qualities of the view, whilst allowing for an appreciation of the geography of the River, the depth and scale of London and assisting in the viewers orientation of the political and commercial centres of the Capital. It would be a minor enhancement to the view overall.

262. In summary, the proposal would preserve, and in relation to V42 and 43 contribute positively to, the characteristics, composition and significance of the local views of metropolitan importance, in accordance with Policy 40 and guidance contained in the draft Metropolitan Views SPD.

London Borough of Camden:

263. Other than those relevant LVMF pan-London views from Parliament Hill, Primrose Hill and Kenwood, addressed elsewhere in this report, Camden have not designed strategic local views of relevance to the CoL.

London Borough of Hackney:

264. Hackney has not identified any strategic local views of relevance to the CoL.

London Borough of Tower Hamlets:

265. Tower Hamlets identify six local views through there Development Plan, none of which would be affected by the proposal and would be preserved.

Conclusion on Neighbouring Borough Local Views:

266. The proposal would result in the preservation and on the occasions set out above, enhancement, of neighbouring Borough strategic local views.

City Landmarks and Skyline Features, Views Of:

267. The proposal would affect views of historic City Landmarks and skyline Features which, in accordance with CS 13, should be protected and enhanced for their contribution to protecting the overall heritage of the City's landmarks in accordance with Local Plan Policy CS13(2).

Lloyd's Building:

268. The Lloyd's building is presently partially and distantly visible from a number of viewpoints along the river and to the west, appearing diminutive against its taller neighbours within the Cluster. The quality of these views is such that the building is not readily discernible to the naked eye, and only identified through magnification. Within the majority of views, the proposals will be seen either adjacent, very partially in the background, or partially reducing the visible extent of the Lloyd's building. The Lloyd's building will however continue to be identifiable, curbing the extent of the impact which does not amount to a total loss of visibility. Additionally Officers' assessment has found consented schemes will occlude the Lloyd's Building entirely within these views, mitigating this partial loss of visibility.

269. For completeness, it is noted that within one view from Waterloo Bridge (LVMF 15B.2) the proposals will screen the Lloyd's building entirely. However, the extreme distance of this viewpoint is such that the building is not identified as a contributor within the LVMF SPD, either a 'landmark' or within the supporting text. As such this loss of visibility is not considered to reach a sufficient threshold to create harmful impact. The overall skyline presence is therefore considered to be preserved. Please see additional assessment within the designated assets section below.

Cannon Street Station Towers:

270. The proposals will be seen as part of the backdrop behind the Station Towers in views from Southwark Bridge, forming part of the city cluster. While the proposals will be visible in views of towers, the proposal is not considered alter or detract from the presence or contribution of the Station Towers within this view, with the distance of this viewpoint from the site allowing the Station Towers to remain distinct. No harm has been found to the building's significance, nor the contribution of its

setting. The overall skyline presence is therefore considered to be preserved. Please see additional assessment within the designated assets section below.

Former Port of London Authority HQ:

271. The proposals will be visible in views to the Former Port of London Authority, forming part of a backdrop of tall buildings within the City Cluster. Officers consider that while visible, the proposals will not diminish an appreciation of the listed building's silhouette or decorative detail. Further to this the cumulative scheme indicates the proposals will be screened entirely within these views, forming but one part of an evolving established cluster, seen within the distance. Therefore the former Port of London Authority HQ is considered to retain its prominence and visual strength. No harm has been found to the building's significance, nor the contribution of its setting. The overall skyline presence is therefore considered to be preserved. Please see additional assessment within the designated assets section below.

Southwark Cathedral:

272. The location of the proposals will not affect any identified views of Southwark Cathedral, including LVMF views 14 and 17. This has been established through the scoping exercise of the HTVIA and tested with 3D modelling. While the building will be visible in views towards the cathedral from Borough High Street, no harm has been found to the building's significance, nor the contribution of its setting. The overall skyline presence is therefore considered to be preserved. Please see additional assessment within the designated assets section below.

Royal Exchange:

273. The proposals will be seen together with Royal Exchange in views east from Bank junction. However, in both the baseline and cumulative scenarios, officers consider this change to be consistent with how the City Cluster currently contributes to these views, providing a backdrop of tall buildings. No harm has been found to the building's significance, nor the contribution of its setting. The overall skyline presence is therefore considered to be preserved. Please see additional assessment within the designated assets section below.

Tower Bridge:

274. The proposal would affect viewpoints towards Tower Bridge along the South Bank of the River, located to the east and looking west. From

Butler's Wharf, in the baseline scenario, the proposal would partially infill the sky gap between 20 Fenchurch Street and the northern tower of the Bridge. Within the revised view 15 of appendix E to the HTVIA the proposals are seen to join with the outline of the north tower. As such, the proposal would cause a limited degree of harm to the setting of Tower Bridge, specifically through reduction of its clear sky setting within this view. In the cumulative scenario however, this impact is lessened by the consented form of 55 Gracechurch Street, which infills to a greater extent the clear sky in the 'picture frame' of the tower's form. Officers also note, this impact will lessen further as the Bridge is approached, subsequently becoming more dominant and commanding within the foreground. Given the limited and transient nature of this impact, combined with the significant distance of the site to the west, the proposals overall are considered to cause a slight level of less than substantial harm to the significance of Tower Bridge, very much at the lowest end of the spectrum. Please see additional assessment within the designated assets section below.

Tower of London:

275. The proposals will be seen in views from and towards the Tower of London, specifically identified and assessed in detail elsewhere in the report. This assessment acknowledges the longstanding relationship of the City Cluster with the setting of the WHS, appreciated as a distinct and separate element. This assessment has found the proposals will be seen with the Tower of London in views from London Bridge, Queen's Walk, Tower Bridge and in and around the Tower of London, visible within the western edge of the cluster. Within these views it has been found that the proposals will not obscure, distract from or dominate the Tower of London due to the intervening distance, siting, scale, form and appearance of the proposals. The observer would continue to recognise and appreciate the Tower of London as the Strategically Important Landmark, set away from the City and not lost in it. Officers therefore found the proposal would not harm relevant attributes of OUV or relevant components which form part of the LVMF visual management guidance. The overall contribution of setting and therefore the significance of the WHS or its OUV has therefore found to be preserved. Furthermore it is also considered the proposal would assist in the consolidation and development of the City Cluster of tall buildings in line with the visual management guidance in the LVMF including the view specific visual management guidance. The overall skyline presence of the Tower of London is therefore considered to be preserved.

St Michael Cornhill:

276. St Michael, Cornhill is identified in the Protected Views SPD as city church with a skyline presence. The proposals will be seen in transitory views together with the church tower when moving east along Cornhill towards the site. This includes a specific incident where the proposals, through their appearance the background, will be seen to join-together with the tower's outline against the sky. This impact and its effects on the setting and significance of the tower is assessed in detail below. In summary, officers consider this change will be experienced as a fleeting moment, and one taken together with the established views of the city cluster- the latter presently appreciated as a dynamic backdrop feature which frequently results in arresting contrasts of this nature. Nevertheless, such is the contribution of the view from Cornhill/Royal Exchange Buildings to the church's significance that the proposal is considered to cause a low level of less than substantial harm to its significance, in particular an appreciation of it, taking into account all mitigating factors outlined.

Conclusion on City Landmarks and Skyline Features:

277. The proposal would preserve views of all relevant City Landmarks and Skyline Features with the exception of causing some minor harms to St Michael's Cornhill and Tower Bridge. This would result in some minor conflict with part of CS 13(2).

Conclusion on Strategic Views:

278. The proposal has been sited in the City Cluster which is central to the strategic growth balance in the City. This seeks to consolidate strategic growth in the area with the least impact on pan-London and strategic views which go to the heart of the character and identity of the City and London. It would assist the consolidation of the City Cluster and would preserve and take opportunities to enhance the composition and characteristics of strategic LVMF views 1A, 2A-B, 3A, 4A, 5A, 6B, 10A.1, 25A.1-3, 11B, 16B, 15B, 17B and 19A. It was also sited and designed to preserve strategic views of and from the Monument and of the setting and backdrop to St Paul's Cathedral, including from the Processional Route. It would enhance the composition and characteristics of a number of neighbouring borough views which draw some benefit as a material consideration. It would draw some more limited conflict with CS13(2) in that, whilst preserving views of most relevant City Landmarks and Skyline Features, would cause some minor diminishment of views of the Church of St Michael Cornhill and Tower Bridge.

279. Overall, the proposal satisfies and draws support from London Plan Policy HC4, Local Plan Policy CS13(1&3) and associated guidance in the LVMF SPG and Protected Views SPD. At the same time, it would

draw some conflict with the part of CS13(2), as it relates to City Landmarks and Skyline Features. Overall, on balance, it is considered the proposal would accord with Policy CS 13.

Designated Heritage Assets:

280. Objections have been received from the Government's advisor on the historic environment, Historic England, and the National Amenity Society, the Victorian Society, in addition to heritage harm has been raised by the GLA. Officers have considered these representations carefully and afford them considerable importance and weight. There is some consensus, but some clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.

281. Leadenhall Market Conservation Area:

282. The site of the proposal is located within the Leadenhall Market Conservation Area (CA), with its frontage to the western CA border along Gracechurch Street and its north, east and south elevations facing into series of lightwells which diverge from the intricate tangle of alleys and thoroughfares leading to the heart of the CA; the site's north and east elevations directly adjoin and share party walls with the Market buildings on the Central Avenue and Lime Street Passage, while the south elevation adjoins and shares a party wall with 1-4 Bull's Head Passage.

Character, Appearance and Significance:

283. The Leadenhall Market Conservation Area Character Summary and Management Strategy SPD was adopted in 2017. It articulates the character, appearance and significance of the Conservation Area, distilled in six Identified Attributes under Section 3 ('Summary of Character', p.8), as follows:

- The grade II* listed Victorian buildings of Leadenhall Market are an outstanding example of a Victorian market and offer a remarkably cohesive and immersive experience.
- A vibrant mix of uses and activity, strongly complimenting the predominantly financial and insurance activities in the area
- Highly significant archaeological remains relating to the 1st Century Basilica Forum and medieval 'Leaden Hall'
- A place where the predominant scale of buildings, streets and spaces contrasts greatly with those in its immediate setting, resulting in dramatic townscape views;
- Preservation of the medieval street plan within the 19th century market buildings, offering an intricately layered plan form and retained historic thoroughfares;

- An area which is increasingly experienced from higher level viewpoints and where the appearance of its roofscape is of special importance.

284. The SPD highlights, in Section 5 (p.16) certain Identified Views (in a non-exhaustive list) through which this character, appearance and significance can best be appreciated. The impact of the proposal upon each Identified Attribute and relevant Identified View has been assessed below.

285. The SPD does not specify the contribution of the existing building to the character, appearance, and significance of the CA; instead, it notes (p.20): 'Dating to the 1930s, Nos. 85-87 has a far simpler [than neighbouring 81-82] Portland stone street elevation with minimal surface decoration save for Greek detailing and a strong central granite entrance with prominent keystone. The building has been sympathetically remodelled at street and first floor levels to provide a symmetrical retail frontage'. Though not explicit, the SPD implies that it is the principal facade on Gracechurch Street that contributes to the character, appearance and significance of the CA. Historic England in its letter agree with this assessment, whilst acknowledging that later alterations limit that contribution to a degree.

286. HE also acknowledges that behind the principal façade the site was probably designed to maximise height in accordance with contemporary regulations, which was extended again in the 1980s. It recognises that this additional height is more noticeable from the rear, where the utilitarian façade and cluttered roofline does not make a positive contribution, though the scale remains relatively neutral. It is also noted that the current building resulted in the loss of a historic court and more intricate fine grain, more characteristic of the Conservation Area, when built. The GLA also note that, overall, it makes a positive contribution to the Conservation Area.

287. Officers agree that the principal Gracechurch Street elevation is the only element of the current site which makes a positive contribution to the Conservation Area, the result of its 'Neo-Grec' style, detailing and higher quality materials, tempered somewhat by later alteration. It is considered that this element makes a modest contribution to the character, appearance and significance of the Conservation Area.

288. The 'roof' above principal parapet level and other secondary elevations are all considered expedient and utilitarian, and of a somewhat incoherent and cluttered form and appearance. At a scale only somewhat familiar but still in abrasive contrast to the adjacent market buildings, it is considered, overall, these elements cause a modest

detraction from the Conservation Area, in particular when viewed from Lime Street Passage, but also from above.

Contribution of Setting:

289. The CA is located at the western edge of and in amidst the City Cluster of tall buildings and its immediate setting is defined by a backdrop of tall buildings, particularly to the north where in baseline and cumulative scenarios dramatic and dynamic juxtapositions exist with the CA: Lloyd's of London, 1 Leadenhall (implemented), 6-8 Bishopsgate (implemented), 22 Bishopsgate (completed) and 122 Leadenhall Street (the Cheesegrater, completed). These comprise a particularly prominent backdrop in views looking north from Gracechurch Street, Lime Street and Lime Street Passage; views in which No. 85 would also figure. To the south, 20 Fenchurch Street forms a prominent backdrop to southerly views from within the CA, a quality that would be reinforced by the implementation of consented tall building proposals for 55 and 70 Gracechurch Street.

290. Overall, it is considered that the Conservation Area draws only modest contribution from elements of setting to significance, in particular an appreciation of it. The substantial significance is drawn from the intrinsic interest inherent in the physical form and fabric of those contributing elements of the Conservation Areas, comprising good surviving parts of buildings and historic grain and street patterns. It is considered that those positive elements of setting which make a modest contribution to significance are:

- The dramatic and clear contrast in scale between buildings between taller buildings and smaller, finer grain historic structures, best observed in some juxtapositions between new and old such as that between Leadenhall Market and the Lloyd's Building (Grade I) whose special interest in part is deemed by Historic England to glean from it forming a "wonderfully incongruous" backdrop by surrounding listed buildings, in particular that with Leadenhall Market. It is considered this makes a modest contribution to significance and an appreciation of it.
 - o The relationship with complementary historic buildings comprising the Bank Conservation Area (assessed below), in particular the buildings fronting the west side of Bishopsgate and Gracechurch Street. This is considered to make a modest contribution to its character, appearance and significance.

291. In summary, then, the CA's character, appearance and significance is augmented in the traditional sense by its westerly setting towards Bank, but also derives a more modern, dynamic contribution to significance from its north and eastern settings of the City Cluster.

Impact:

292. Under the proposal, the existing building would be demolished, save for the retained Gracechurch Street principal facade, and redeveloped to provide the Public Hall, flexible office space and Heritage Garden, with the office tower element rising distinct above.
293. The proposal would infill lightwells which currently exist to the north, east and south elevations, with these elevations of the proposal abutting the party walls of the New Moon Tavern, Leadenhall Market, 1-4 Bull's Head Passage and 81-82 Gracechurch Street. As part of this a number of chimneystacks serving the Market, extended upwards in the 1930s as part of the construction of the existing building, would be trimmed back down to approximately their Victorian extents. There would be no other demolitions of existing Victorian Market fabric or removal of fabric associated with 1-4 Bull's Head Passage or 81-82 Gracechurch Street. These works are considered acceptable in principle, and full details of the interfaces between the proposal and the existing party walls around the site would be reserved via condition.
294. The proposed demolition of the building and retention of the Gracechurch Street façade, the only element of it which contributes to the character, appearance and significance of the conservation area, is considered to be acceptable in principle. The demolition of the east, north and south elevations and roofscape of the building, which detract from the character, appearance and significance of the Conservation Area, is considered an enhancement in principle, subject to the acceptability of the replacement.
295. The retained façade would be modified by (i) widening the existing stone portal with replacement stone detailing to match, (ii) introducing bronze doors to the flanking bays, inspired by and in the spirit of drawings of the original elevation and (iii) recessing the existing bronze windows and spandrels on the upper levels to introduce greater depth and articulation to the façade. These works would replace works of later modern remodelling and imbue the elevation with materials and detailing characteristic of the age in which it was designed and built. This is considered to be an enhancement of the elevation, and therefore of its contribution to the CA; relative to the scale of the CA as a whole, and the status of the existing building within it, the level of this enhancement is considered to be slight.
296. Accessed through the retained frontage, the proposed Public Hall would reinstate a historic east-west route across the site, linking Gracechurch Street with Lime Street Passage. This would be a direct enhancement of the retained medieval plan form and intricate historic throughfares which, as Identified Attribute 5, the SPD lists as part of the character,

appearance and significance of the CA. Faced in warm, traditional materials and of compelling spatial proportions and architectural details influenced by the adjacent Market, the Hall would be a complimentary new space within the CA that would sit comfortably alongside the covered walkways of the Market and the elevations of the wider CA. Moreover, it would sympathise with and perpetuate the historic functionality of the Leadenhall as a gathering-place. Overall, the provision of the Hall and associated reinstatement of the historic route is considered to be a modest level of enhancement to the CA as a whole.

297. Attribute 2 of the SPD identifies that the vibrant mix of uses and activity within the Conservation Area forms part of its character, appearance, and significance. The provision of the proposed Public Hall and the Heritage Garden would considerably enrich this vibrant mix of uses and activity within the CA, by providing spaces and uses that are currently not present within the CA and would be complimentary to the existing Market and associated uses. It is thereby considered that this would represent a modest level of enhancement of this attribute of character, appearance, and significance overall.
298. Great care has been taken to differentiate between the podium, and how the proposal meets its immediate context, and the integration of the tower elements above to respond to the unique characteristics and significance of this Conservation Area in amidst the City Cluster.
299. Given the narrow streets of the medieval street pattern and the covered walkways of the Market, the taller tower element would be largely screened from view in the Conservation Area, only appearing in three of the Identified Views noted in the CA SPD.
300. View 7 identified in the SPD is of the eastern portal to the Market, looking west along Leadenhall Place, from the southern base of the Lloyd's Building. In this view, the eastern Market buildings are largely seen against clear sky, but for the upper storeys of the existing building at 85 visible above the Market's eastern portal, and the glazed tower of 1 Leadenhall Court forming a prominent modern bookend to the north. In the baseline scenario, the proposal would form a prominent, dynamic new feature of this view, with its sculpted, serrated form rising up directly behind the Market. Its pale masonry architecture and extensive planting would add incident and interest to the view and would form a dynamic contrast with the glazed geometry of 1 Leadenhall Court to the north. The proposal would be perceived as part of the consolidating Cluster, disassociated from the buildings at ground level, an impression reinforced in the cumulative scenario by the glimpsed presence of the upper levels of 70 Gracechurch Street to the south. It is therefore considered that the proposal in this view would reinforce the contrasts in scale identified in Attribute 4 of the SPD.

301. View 8 identified in the SPD is representative of the experience of looking north up Gracechurch Street at the western portal to Leadenhall Market. In both short and long views looking north, the Market and its neighbouring buildings on the eastern edge of Gracechurch Street, including the proposal site, are seen against the backdrop of existing Cluster towers identified in Attribute 4. In this view, in the baseline scenario, the enhanced, retained façade of the existing building, with new views into the Public Hall beyond, would form a complimentary neighbour to the existing Market portal and Nos. 81-82 Gracechurch Street to the south. The green crown above this would introduce a welcome degree of softness and planting into this urban environment, while the lower stages of the tower, above, would be read as part of the wider Cluster of tall buildings, somewhat disassociated from the CA.
302. This latter impression would be intensified in longer views from further south on Gracechurch Street, where the tower's distinctively sculpted form, pale masonry architecture and extensive greening would be seen as a prominent, high-quality new addition to the Cluster, visually assembling with but architecturally distinct from 1 Leadenhall Court, 122 Leadenhall Street and the other towers established in this view. In the cumulative situation, the consented form of 70 Gracechurch Street would appear with and partially mask the proposal, reinforcing this sense of it being a distinctive new addition to an established Cluster.
303. View 16 identified in the SPD represents the experience of looking north from Lime Street/up Lime Street Passage at the Market buildings. Lime Street Passage is framed on both sides by the frontages of the Market, perceived against a backdrop of either low-rise buildings (including the upper storeys of the existing building on the site) or open sky, and terminates in the southern Market portal, dramatically juxtaposed with 1 Leadenhall Court, 22 Bishopsgate and other towers established in what is now an iconic view. Immersed in the fine-grain, historic scale, materiality and architecture of the Market, this street can be said to represent the conservation area's heart; furthermore, it is the place from which Attribute 4 identified in the SPD might best be appreciated.
304. In the baseline scenario, the proposal would form a very prominent new feature of these views. It would rise dramatically behind the range of Market buildings fronting Lime Street Passage in a manner at ease with some of the sublime contrasts in scale an inherent aspect of the Conservation Area and its immediate setting. The walkway of the Heritage Garden would be a prominent new feature above the Market buildings, and the cranked south elevation and projecting soffits of the east elevation would form a dynamic, immediate backdrop to them. The cranked horizontals and fluted mullions of the pale masonry architecture would have visual affinities with those of the Market buildings, while the planted balconies on the east elevation would add softening and further visual interest.

305. It is considered the greatest impact on the Conservation Area would be when viewed from Lime Street Passage from as far back as the junction with Lime Street, though it would be, on the whole, relatively fleeting, transitory, in the oblique and at a high level. It would be mitigated further by the tight urban grain, intricate street dimensions and arresting vibrancy of the foreground market streetscene. It would remove those current parts of the site which detract from the Conservation Area, replacing unconvincing architecture by reason of its expedient, incoherent and cluttered appearance, with coherent, high quality architecture. Historic England consider the CA relies on a balance between the historic street frontages and the buildings outside the CA of markedly different scale and character, whilst recognising that some of these juxtapositions are positive and others are not, depending often on proximity and physical relationships. Whilst Officers, for the reasons stated, don't consider the Conservation Area relies on those juxtapositions, or that the balance is a delicate one, it is agreed that some are positive and that this relies of judicious analysis having regard for the site-specific circumstances.
306. It is considered that the proposed building would be appreciated as part of a dense, close-knit consolidating backdrop of tall buildings where the strength of the juxtaposition often reinforces the scale of both causing them to be read as distinct. It is the impact of the entire proposal which is to be considered. Given the visual weight and relative proximity in this particular instance, whilst some slight harm could be caused, it is considered that the replacement of the poor-quality backdrop would nullify this brief incident with a countervailing benefit, resulting in the entire proposal having a neutral impact on the significance of the conservation area.
307. View 5 of the SPD is discussed for completeness, provided in view A8 of Appendix E to the HTVIA. This view is of the north portal of the Market, looking south from Leadenhall Street along Whittington Avenue, framed to the east by the former Iraqi Bank and to the west by 1 Leadenhall Court. At the time of writing, the north elevation of the existing building at 85 Gracechurch Street is visible in this view, while 1 Leadenhall Court is under construction. The proposals will frame views along the avenue, seen to the west of the market entrance, and joining with the western edge of the glazed roof, but preserving the majority of its outline. It is noted that when 1 Leadenhall is completed this will almost conceal the proposals from view, leaving only a small sliver visible. In the cumulative scenario, 70 Gracechurch Street will be seen entirely behind the glazed roof of the market entrance. The proposals can therefore be understood as compliant with the consented character of the view, seen as part of an assembly of new buildings within the market's immediate surroundings.

308. The City of London Conservation Area Advisory Committee (CAAC) consider that the proposal would represent significant overdevelopment of a constrained site, lead to the substantial loss of character to the CA and would cause substantial and detrimental harm to the character and appearance of the CA. The CAAC also expressed reservations about the urban greening which it considers to be excessive and inappropriate in the conservation area. For the reasons set out in this report, it is not considered that the proposals could come close to substantial harm to character and appearance, and/or significance, given the unique spatial character of the CA, and that in fact it is officers' view that overall the proposal would result in a modest enhancement to the CA. Officers consider the urban greening of the proposal to be soft, benign presence that would not be detrimental to the character, appearance or significance of the CA.
309. The CAAC characterise the proposals as creating a 'loss of character' which damages the setting of the market. In response officers note that, while the main frontage of the site retains some sympathetic details, the upper floors and roofscape have been found to negatively intrude into the otherwise high architectural quality of the surroundings, by virtue of their indifferent design and 'back of house' character. Through the retention of fabric to the ground floor, those qualities of the existing building of positive 'character' which contribute to the setting of the market and the wider conservation area would be preserved. In addition, the composition of the proposals have also considered the appearance of the site in the round, such that the present incidental quality in views from the east are resolved and replaced with a composed, intentional architectural design.
310. Historic England (HE) considered that the proposal would overshadow the top-lit arcades of the market, resulting in a loss of light compromising an essential part of its architectural character. Detailed technical studies have been undertaken which have found that there would be a negligible / imperceptible impact on lighting levels to the Market, addressed elsewhere in the report. Thus, it is not considered that harm will arise in this respect of the conservation area.
311. Historic England acknowledge that heritage benefit would arise from sympathetic alterations to the principal façade, and the reinstatement of the historic east-west route re-establishing historic urban grain. Officers agree these are small/modest enhancements. However, despite some recognition of the unique City Cluster context, Historic England holds that the proposed tower would detract from the prominence of the market, its roofscape and other surrounding historic buildings, the result of overshadowing and a dramatically different scale as to the general scale of the CA. It found the harm would be less than substantial, and low to moderate in the range of such harm. For the reasons set out in

this assessment, whilst paying considerable importance and giving substantial weight to views of HE, Officers disagree with the harm assessment. Officers consider that on balance the unique spatial qualities of the CA, combined with the particular significance and proposed enhancements, would be preserved, and enhanced to a modest degree, and this is a matter of great weight.

312. The GLA has also considered harm would arise from the “loss” of the existing building (in fact, in part, the principal aspect retained), the height and the design of the proposal. Officers are clear in this assessment, and for the reasons set out in detail, that we disagree and consider on balance that the conservation area would not be harmed as a result of this and would be preserved, with modest enhancement.
313. The proposal would have a neutral impact on those identified elements of setting contributing to significance. In terms of those positive contrasts in height and scale, of small of tall, which often conjure a sense of the sublime, it is considered the proposal would not detract and could add to this unique spatial aspect of the CA, at the heart of the City Cluster. In terms of that relationship with the Bank Conservation Area on the opposite side of Gracechurch Street, either in baseline and cumulative scenarios, the retention and restoration of the principal façade, and the established backdrop of tall buildings, would mean that relationship would be preserved. Overall, the modest contribution of setting to the significance of the CA would be preserved.
314. On the basis of the impact assessment set out in the preceding paragraphs, Officers disagree with HE’s, the GLA’s and the CAAC’s conclusions. The proposal is not overdevelopment, but a considered and design-led scheme which has resulted in the long-term optimisation of uplift relative to strategic heritage constraints, and which has successfully taken opportunities to preserve and enhance the Leadenhall Market Conservation Area. The often-indistinguishable immediate backdrop of the City Cluster is inescapable and a component of the significance of the CA. Overall and on balance, it is considered that the CA, as a whole, would be enhanced to a modest degree.

Leadenhall Market (Grade II*):

315. The site adjoins, and shares party walls with, the grade II* listed Leadenhall Market. A separate application for listed building will be required to be submitted and approved once more detailed proposals are available dealing with new party wall arrangements.

Significance

316. Market complex of 1881 to designs renowned architect Sir Horace Jones, the City Surveyor. The Market comprises a series of roofed arcades disposed about a loosely cruciform plan (a layout preserving the medieval street alignment), with detached portions to the south, all lined with two storey units comprising shopfronts at ground level with offices/ancillary areas above. Of red brick and Portland stone dressings, the architecture is essentially classical, with much flamboyant renaissance-inspired detailing, and plentiful depictions of dragons and other references to the City Corporation.
317. The Market possesses a high level of historic interest for its status as descendant ultimately of the Roman Forum-Basilica, and subsequently the medieval Leaden Hall – as a gathering-place for mercantile activity; and for its associations with Sir Horace Jones, the City Surveyor who designed many accomplished market buildings for the City. Leadenhall was his last market building within the City's boundary.
318. The Market possesses a high level of architectural/artistic and historic interest for its memorable fusion of the medieval, irregular street plan with Jones's formal Market arcades, resulting in oblique, happenstance views and delightful townscape juxtapositions. In this it was unique amongst Jones's City markets, the other two (Smithfield and Billingsgate) being more formally planned. Its high quality of design and construction illustrate the civic pride inherent in the planning and execution of such buildings.
319. Overall, the Market is considered to be of high significance.

Contribution of Setting

320. Overall, the market draws a modest to moderate contribution from elements of setting to significance, in particular an appreciation of it. Most significance is intrinsic and inherent in the physical fabric, plan form and underground archaeology, rather than from setting.
321. To the west, south and east, the immediate setting of the Market is the Leadenhall Conservation Area in which it sits; the historic scale, architecture and urban grain of the CA provides a complimentary foil and sympathetic setting to the Market buildings. The same is true of the Bank Conservation Area lying further to the west across Gracechurch Street. These areas of setting support the historic and architectural/artistic significance of the listed building. Given the character of the market is somewhat self-contained, this wider historic environment makes a near moderate contribution to significance and an appreciation of it.

322. Located within the City Cluster of tall buildings, the setting of the Market to the north and east is of modern tall buildings; as set out in the assessment of the CA, these form a dynamic modern backdrop to the listed building, some of which are exceptional examples of commercial architecture of their time, such as the Leadenhall Building (‘the Cheesegrater’) and in particular the Lloyd’s building, the group value with which Historic England’s List Description describes as “wonderfully incongruous” with some complementary ‘nods’. This makes a modest contribution to significance and an appreciation of it.

Impact:

323. Historic England and GLA in their representations consider the proposals to establish a ‘distraction’ in the surroundings through the addition of height, while the GLA goes on to further characterises this as a ‘sudden’ change in scale. The Victorian Society consider the scale of the proposals to ‘dwarf’ the site to a detrimental degree. For reasons set out in the assessment above and below, officers consider this change in scale to be an established part of the of the building’s setting and this includes an immediacy to how this change is experienced.

324. The GLA additionally comment that the heritage walkway is harmful through its projection out over the roofscape, undercutting the primacy of the listed building in streetscape views. The designs have been specifically tested through the pre-application process to minimise the visual intrusion of the walkway, so that direct views towards the entrance pediments remain unencumbered. This ensures the sense of arrival into the market is preserved. Further to this, while it is acknowledged the walkway of the Heritage Garden would be a prominent new feature seen above the Market buildings, the angled soffits have been designed to form a dynamic, immediate backdrop to them, and sympathetic rather than competitive in impact.

325. Both Historic England and The Victorian Society consider the proposals will overshadow top-lit arches and western entrance, “diminishing interior visibility” compromising an ‘essential’ part of the architectural character. Officers disagree with this conclusion. The technical studies of the scheme’s daylight/sunlight impacts, set out elsewhere in this report, find that a fractional and imperceptible difference in the Market’s internal light levels would result. This negligible impact aside, it is considered that the admission of natural light to the Market is not a contributor to its significance and special architectural or historic interest; thus a fractional difference in aforesaid light levels would preserve the significance and special architectural and historic interest of the listed building.

326. While the main frontage of the site retains some sympathetic details, the upper floors and roofscape have been found to negatively intrude into the otherwise high architectural quality of the surroundings, by virtue of their indifferent design and 'back of house' character. Through the retention of fabric to the ground floor, those qualities of the existing building of positive 'character' which contribute to the setting of the market and the wider conservation area would be preserved. In addition, the composition of the proposals have also considered the appearance of the site in the round, such that the present incidental quality in views from the east are resolved and replaced with a composed, intentional architectural design.
327. As above, the direct impact of the proposals would be minimal. Proposed minor alterations to the party walls would not incur removal of or alteration to original Victorian Market fabric, only later, early C20 fabric such as parapets and chimneystacks which are proposed to be trimmed down to enable the proposed development to proceed in the event of consent being granted. The direct impact of the proposal upon the listed building is therefore considered to be negligible, causing no harm to the significance of the listed building. Full details of the interfaces are to be reserved via condition.
328. The chief impact would be indirect, via change in the setting of the listed building.
329. In views of the main west portal to the Market, the retained, reimagined Gracechurch Street façade of the proposal would form a complimentary adjunct, harbouring compelling views of the Public Hall beyond; similarly, in views of the west range of Market buildings along Lime Street Passage, the proposed east entrance to the Public Hall would offer oblique glimpses into the Public Hall. The reinstated historic east-west route kinked through the Public Hall would elide with the spirit of the Market's conception as a formal space on an informal alignment. The sequence of gathering spaces and routes within the immediate orbit of the listed building would be enriched in line with the genius loci or spirit of the place. The glimpses and views of the new gathering-space in the Public Hall would further enrich the fine grain hive of related commercial activities at the heart of the character of the market complex.
330. In longer views north and south along Gracechurch Street, the main west portal is already a comparatively diminutive presence, seen against a wider backdrop of modern tall building development. The proposal would reinforce this existing dynamic and would have a somewhat benign impact on the setting of the listed building in these views.
331. In baseline and cumulative views of the eastern and southern market portals along Leadenhall Place and Lime Street Passage the proposal would form a prominent new feature, rising directly above and occupying

previously clear sky above the Market buildings. It is acknowledged that the proposals introduce a marked change of scale within the site, and that the site is located in close proximity to the listed building. However it has been established that this change of scale is a currently appreciable characteristic of the setting to the listed building. Secondly, this proximity with tall buildings has been successfully leveraged to achieve an architectural drama found to be of benefit to the market's existing setting and significance. For example, the juxtaposition between market and Grade I Lloyd's Building is accepted as a positive counterpoint in the surroundings. It is also noted the architectural interest of the building is not reliant on a perception of its prominence within the streetscape, rather views to the market are overwhelmingly characterised by its sudden 'unveiling', as the entrances into the market come into view within the narrow lanes to the east.

332. Officers do accept however that, consistent with the impact to the conservation area outlined above, the contiguity of the site and listed building, could cause some slight harm, through the proximity and visual weight of the proposals. As stated previously, the viewpoints where this harm arises are considered fleeting, transitory and oblique, limited by the intricate urban grain of the surroundings which allows only unfolding rather than distant views. Furthermore, the proposals have been found to resolve the existing harmful contribution of the site's incidental and cluttered upper levels, replacing these with a composed, intentional high-quality design. Fundamentally it is considered that when taken together, these brief incidences of harm would be nullified with a countervailing benefit, resulting in an overall neutral impact in this instance.
333. Overall, it is considered the proposals would preserve the significance and special architectural and historic interest of the listed building and the contribution made by setting to that significance and an appreciation of it.

Church of St Michael Cornhill (Grade I):

Significance:

334. Church of 1670-77 by Sir Christopher Wren, with tower of 1715-21 by Nicholas Hawksmoor and High Victorian remodelling of the interior by Sir George Gilbert Scott. The only parts of the exterior visible are part of the south elevation, the west elevation and the north elevation and base of the tower. The rest is obscured by neighbouring buildings. Wren's body of the church is of Portland stone in his classical style incorporating round-arched windows to the south elevation. Contrastingly, Hawksmoor's tower employs the gothic style to striking effect, in four

muscular stages and culminating in four richly modelled polygonal pinnacles with ogee caps and glittering finials. From a surviving drawing of the tower dated 1421, it is clear that Hawksmoor's design for the new tower perpetuates the outlines and style of the old one with only minor differences. To the tower's northern foot is a gothic porch by Gilbert Scott.

335. The building is of very high architectural/artistic interest: for the striking juxtaposition of Wren's classical and Hawksmoor's gothic architectural languages, for the very high calibre of the designs and quality of execution of the building in general, and for Hawksmoor's forceful, idiosyncratic and charismatic interpretation of the gothic style present in the tower, which perpetuates the appearance of its predecessor on the skyline.
336. The building is of very high historic interest: for the associations with the aforesaid architects, stellar names in British architectural history; for its status as a long-lived descendant of an ancient, medieval foundation upon the site of the Roman Forum-Basilica; and for its associations with generations of past City communities, including many notable individuals such as Robert Yaxley, King Henry VIII's physician, buried in the church in 1540. The vast majority of that significance is contained in its physical historic fabric and fixtures and fittings, albeit some significance is drawn from setting.

Contribution of Setting:

337. The church is framed on all sides by the bustling historic townscape of the Bank Conservation Area, averaging five storeys in height and dating from the C18 to the present day. Because of the dense, built-up surroundings, only from the churchyard and St Michael's Alley to the south can views of both tower and church be obtained, contributing to its architectural significance. Otherwise, views of the north elevation from the tower can be obtained directly opposite on Cornhill, while the upper stage and pinnacles form a memorable townscape set piece in views east, and to a lesser extent west, along Cornhill. The junction of Cornhill with Royal Exchange Buildings offers a moment to appreciate the pinnacles of the church in an oblique view soaring above the commercial buildings on gently rising land towards one of the City's two hills, Cornhill.
338. Surrounded by historic buildings of a grand but generally lower scale than the tower, the immediate setting of the church in all directions makes a strong contribution to its significance by maintaining the townscape relationship of lower secular buildings and higher ecclesiastical tower that would have prevailed since it was founded. The layering of variable historic plot shapes and architectural treatments, and

the fine grain of the medieval street pattern here, all add richness and incident which evoke the preceding centuries of the church's existence and status within its parish and the wider City. These make the strongest, moderate, contribution to significance and an appreciation of it.

339. The views of Hawksmoor's elegant pinnacles, closely resembling their medieval predecessors, rising above the historic commercial frontages lining Cornhill is considered to be a quintessentially 'City' juxtaposition of ecclesiastical grace with commercial grandeur. As such, views of the church eastwards along Cornhill are considered to make a strong contribution both to its architectural and historic significance, especially from the junction with Royal Exchange Buildings, where the pinnacles can be appreciated in their fullest against clear sky.
340. The historic townscape surrounding the church extends for some distance to the west, south and north as the Bank Conservation Area. To the near east, across Gracechurch Street, the City Cluster provides a dynamic modern backdrop of towers to the eastern parts of the Bank Conservation Area of which the church is part. In some of those Cornhill views, particularly from Bank Junction and the commencement of Cornhill, the church's pinnacles are seen against 1 Leadenhall Court and the other modern towers of the Cluster. While this element of setting results in an established, dynamic juxtaposition between old and new, it is considered to make only a neutral contribution to the significance of the listed building.
341. As well as this local setting, the church's pinnacles can be appreciated from riparian bridge view from the south and west, from Waterloo and Hungerford Bridges, as part of a wider skyline ensemble, albeit against the backdrop of the City Cluster. These views are considered to contribute to the significance of the church by illustrating its status as part of a 'family' of City churches. These make a lesser contribution to significance overall.

Impact:

342. The GLA consider the proposals to result in less than substantial harm, ranging between a low to middle level of harm, due to changes in backdrop and intervisibility between this building and the site. Similarly, HE considers some less than substantial harm would arise here from what is described as probably the most distant view from Royal Exchange Buildings where the sky-etched silhouette of the tower would be in part backdropped by the proposal.
343. In views of the church looking east from Bank Junction and the commencement of Cornhill, the proposal would be backdropped by 1

Leadenhall, which is under construction, albeit in the foreground with the strong sense of 'here and there' which mitigate that impact. HE recognises the role tall buildings play as a backdrop presence in its letter, describing them as generally distant. Officers agree and note that HE did not claim harm would be caused to the church in their formal response on 1 Leadenhall, which is closer and more prominent in the backdrop than the proposal. Nevertheless, Officers agree the transitory moment, described as an incident by HE, around the eastern edge of Royal Exchange Buildings is the best place to appreciate the church in the near setting.

344. Moving east along Cornhill, the proposal would draw closer to the church's pinnacles, and colliding with them at the junction with Royal Exchange Buildings. The proposal's pale masonry architecture, intricate elevational design and extensive greening, which otherwise would be a positive quality in many views, would here unfortunately blur the silhouette of the pinnacles and detract from (i) the ability to appreciate them as an integral architectural composition and (ii) puncture the composition of church pinnacles with commercial buildings below and the clear sky behind.
345. The resultant impact is considered by Historic England to create less than substantial harm to the significance of the church, falling within the middle of the range. HE has stated this is in part due to the quality of the existing views of the church tower, which HE considered to be the most advantageous in respect of appreciating the church's significance. It is acknowledged however that these impacts are appreciated as a fleeting moment; that the experience of viewing the church whilst moving east along Cornhill is a kinetic one; and that the City Cluster is an established, dynamic backdrop feature that frequently results in arresting contrasts. It is further acknowledged that other views of the tower against clear sky would remain unaffected, including from directly north opposite on Cornhill and from the churchyard. Nevertheless, such is the contribution of the view from Cornhill/Royal Exchange Buildings to the church's significance that it is the view of officers that the proposal would cause a low level of less than substantial harm to its significance, in particular an appreciation of it, taking into account all mitigating factors hitherto outlined.

Tower Bridge (Grade I):

Significance and Contribution of Setting:

346. Bridge of 1894, engineering by Sir John Wolfe Barry and architecture by Sir Horace Jones, for the City of London Corporation. It represents a

triumph of Victorian engineering as a low, hybrid suspension and bascule bridge with a steel frame, clothed in revivalist French gothic towers, turrets and pinnacles. The dramatic symmetrical composition acts as a 'portal' to central London from the River and has become an iconic and internationally recognised landmark of London.

347. The building possesses very high architectural/artistic interest for its iconic silhouette, refined Victorian revivalist gothic stylings, and marriage of modern functionality with High Victorian aesthetics. It possesses very high historic significance for its associations with the aforementioned architectures, of national repute, and for its iconic, worldwide fame as a symbol of London. The dramatic setting of the building astride the Thames, its approaches to the north and south, and its juxtaposition with the Tower of London nearby make a significant contribution to significance, in particular an appreciation of it.

Impact:

348. The GLA consider the proposals would result in less than substantial harm, ranging between a low to middle level of harm, due to a change in backdrop and intervisibility with the listed building. This is addressed below. The proposal would affect those views of Tower Bridge from the South Bank of the River from the east looking west. From Butler's Wharf, in the baseline scenario, the proposal would partially infill the sky gap between 20 Fenchurch Street and the northern tower of the Bridge. Within the revised view 15 of appendix E to the HTVIA the proposals are seen to join with the outline of the north tower reaching up to the horizontal lattice girder. This further erosion of sky in the open 'picture frame' of the Bridge between the iconic towers undermines its composition and role as the 'gateway' to central London, drawing the Cluster further south-west into the iconic 'picture frame' between the twin towers. As such, the proposal would cause a limited degree of harm to the setting and therefore the significance of Tower Bridge.
349. In the cumulative scenario, the impact is lessened by the consented form of 55 Gracechurch Street, which infills to a greater extent the clear sky in the picture frame. Furthermore, the impact reduces on the approach to the Bridge, which becomes more prominent as the observer moves closer, until it commands and dominates the foreground. Given the very limited extent of the impact, its transiency, the significant distance of the proposal to the west and the relative significance of this viewing platform, the proposal overall is considered to cause a slight level of less than substantial harm to the significance of Tower Bridge, very much at the lowest end of the spectrum.

The Monument (Grade I and Scheduled Ancient Monument)

Significance and Contribution of Setting:

350. Monument of 1671-77, by Sir Christopher Wren and Robert Hooke. The Monument to the Great Fire symbolised the restoration and renaissance of London following the Great Fire of 1666 as a major European economic, cultural and political centre. It comprises an elegant fluted Roman Doric column of Portland stone, the largest free-standing classical column in the world, crowned with a gilded flaming orb, supported atop a large cuboid pedestal bearing inscriptions and bas-reliefs describing the circumstances of its conception. The Monument is of exceptional architectural/artistic and historic significance as a City/London-wide Landmark.
351. The setting of the Monument makes a significant contribution to its significance and an appreciation of it, in particular its architectural, historic and to a lesser extent artistic significance. It was symbolically sited near the site on Pudding Lane where the Fire began and on near axial alignment with the Old London Bridge, the site of the original Roman bridge from which London originated. It once, alongside the rebuilt City church towers/spires, was pre-eminent in the much artistically represented London skyline as part of a family of Wren landmarks representing the character and identity of the City of London up until the end of the 19th Century. It comprised part of the main southern arrival experience from London Bridge, forming part of the gravitas and grandeur of a Renaissance city. As it did then, it has informed the height and curation of the townscape around it for over 300 years.

Impact:

352. The GLA consider the proposals would result in less than substantial harm, ranging between a low to middle level of harm, due to a change in backdrop and intervisibility with the listed building. This is addressed below.
353. Viewed from the South Bank, on the alignment of Old London Bridge, just downstream of the existing bridge, the proposal would, in the baseline scenario, be perceived at some remove to the north-east, leaving the setting of the Monument untroubled; in the cumulative version of the same view, it would be occluded by other schemes. Looking north along Fish Street Hill towards the Monument, in the baseline scenario, the proposal would appear far in the background, part of the Cluster, and would not encroach upon the silhouette of the Monument; in the cumulative scenario it would be almost entirely occluded by the consented forms of 70 and 55 Gracechurch Street.

354. Similar to views along Fish Street, views from the viewing gallery at the Monument looking towards the site presently take in the City Cluster, illustrated in View A9 within Appendix E of the HTVIA. These images show the proposals will be seen, sitting entirely within the built visual envelope and sky silhouette established by the existing buildings of the Cluster. In the cumulative scenario, the proposals will be entirely occluded by the consented 55 Gracechurch Street.
355. Accordingly, the proposal would preserve the significance and setting of the Monument as a grade I listed building and Scheduled Ancient Monument.

St Peter Upon Cornhill (Grade I):

Significance and Setting:

356. The significance of the building is exceptional, forming one of the post Great Fire city churches designed by Sir Christopher Wren, and consequently illustrative of his transformative works across the City during that period. The significance of the listed building stems from its high architectural and historic interest as a seventeenth century church. The retention of the lower parts of the medieval tower amplifies the historic rarity value of the fabric, and this is complimented by the expressive classicism of Wren's later façades. Damage to the ground floor frontage to Gracechurch Street is evident, detracting from the otherwise decorative appearance of the building.
357. The setting of the church is unusually secluded, making a range of contributions to the significance of the listed building. Despite being located on a major thoroughfare, there is no access from the church onto Gracechurch Street, so that while the historic character of the eastern elevation is visible, a full appreciation of its significance is not readily achieved in views from the east. Shopfronts obscure the majority of the northern elevation, aside from a small projecting entrance at ground floor. The most complete views of the building are from within the church yard to the west of Gracechurch Street. This is almost completely enclosed, and accessed only by the narrow St Peters Alley, a small lane thought to date to the Saxon occupation of the City. The immediate setting of the church therefore comprises this yard, with separately listed wrought iron gates (Grade II) creating group interest. The verdant and enclosed quality of the yard makes a positive contribution to the setting of the listed church, as do the glimpsed views of the tower seen from along Cornhill, sign posting the church's location at a topographical high point.

358. As existing, the site is not visible in views within the church yard, but the eastern elevation of the church is seen together with the site, in views south along Gracechurch Street, also taking in the taller buildings of the cluster further to the east. Overall, the site is considered to make a neutral contribution to the setting of the church.

Impact:

359. The technical assessment of the scheme's daylight and sunlight impacts, set out elsewhere in this report, has found that the church would experience a small drop in daylight/sunlight levels. This would be via the stained-glass windows in the east and south elevations, both of which date to the nineteenth and twentieth centuries of the church's existence. It is considered that the decrease would be modest and imperceptible to those experiencing the church's interior and would not affect an observer's ability to appreciate the stained glass windows, preserving the significance of the church.

360. While the proposals will be visible in views south along Gracechurch Street and seen together with the eastern elevation of the church, this is not considered to alter the existing contribution of this view to the listed building's setting, which is already defined by a sense of contrasting architectural character, materiality and scale. It is further noted that the consented scheme to 1 Leadenhall, will be visible in views from the church yard, as well as heighten the sense of contrast to each side of Gracechurch Street. The former churchyard is well contained and enclosed, to the extent the outside world is peripheral to the experience. Within this context the proposals are considered to constitute a neutral impact to the setting of the listed church, retaining the existing dramatic change in scale currently appreciable in the wider surroundings at a high level. The significance and setting of the church would be preserved.

Lloyd's of London together with Nos 12 & 14-19 Leadenhall Street
(Grade II):

Significance and Contribution of Setting:

361. Designed by Richard Rogers & Partners and completed in 1986 Lloyd's of London retains very high architectural significance, as the pre-eminent example of the 'Hi-Tech' design movement of late Modernism. The building's innovative steel and concrete material expression and flexible planform further amplifies this interest, recognised as one of Rogers' most influential works. Additional historic interest resides in the

association with the Lloyd's firm, and the conservation philosophy which resulted in the rehousing of the 'Adam Room' within the new building, comprising an eighteenth-century Robert Adam interior. Similarly, the integration with the retained Nos. 12 and 14-19 Leadenhall Street, built in 1928, designed by Edwin Cooper and separately listed grade II also creates significant group value. The latter reflects the remains of the last headquarters built on the site and comprises a colossal Portland Stone doorway, with coffered dome semi dome above, joined to a grand five storey façade decorated by rusticated piers and Doric entablature.

362. The Lloyd's Building's immediate setting can be generally categorised as fortuitous, defined by a sense of variety and contrast. It is noted however the design of the building is responsive to the Grade II* Leadenhall Market, located immediately to the south-west, with a central glazed atrium playfully echoing the construction and material palette of the Victorian market. The relationship between the two buildings however is chiefly one of extreme counterpoint, with regards to both character and height, and the group value described as "wonderfully incongruous". There is some group value in the relationship between Lloyd's and the emerging Cluster of tall buildings it was designed to consolidate, in particular with the Leadenhall Building opposite, which represents the development in the practice and style of the same influential architectural practice.

Impact:

363. The GLA has found less than substantial harm to the significance of a number of listed buildings including the Lloyd's Building, through alteration to their backdrop and changes in intervisibility. This is assessed below.
364. The tall buildings of the City Cluster are located immediately to the north and northeast. These rise substantially above that of the listed building, as seen in more distant views of the Cluster from the south, as well as experienced at street level, particularly from the junction with Lime and Leadenhall Street. The upper stories of the site are currently visible in views from Lloyd's towards the market, seen above the stone pediment of the eastern market entrance. These existing glimpses are incidental in quality, taking in the poor-quality rear façade of the current site which detracts, albeit only slightly, from the view.
365. The proposal is beyond the Leadenhall Market to the southwest and would add to the baseline and cumulative backdrop of tall buildings in a dense Cluster which are at the heart of the genius loci of the place. The clear and strong juxtaposition between Lloyd's and the market would remain undiluted by the more distant presence of another tall building.

366. This dense relationship and strong juxtapositions with the surrounding Cluster would be maintained by the proposal, in particular the group relationship with the Leadenhall Building which would be undiluted.
367. The Lloyd's building is presently partially visible from a number of viewpoints along the river and to the west, appearing comparatively diminutive against its taller neighbours within the Cluster. In views 22 and 23 of the HTVIA the listed building will remain visible, with the proposals seen either adjacent or very partially in the background. As such the existing contribution of these views to the setting and significance of the listed building is considered to be preserved, remaining consistent with the perception of the Lloyd's Building within the tall building cluster.
368. Within views 24, 25 and 29 the listed building is partially visible, the glazed atrium just distinguishable in front of the Scalpel. It should be noted the distant quality of these views limits their contribution to the setting and significance of the building. The proposals would partially obscure the existing visible extent of the listed building in these views. However that the Lloyd's building will continue to be identifiable, curbing the extent of the visual impact which does not amount to a total loss of visibility.
369. The assessment of cumulative impacts has further demonstrated that the consented schemes will occlude the Lloyd's Building entirely within in views 22, 24, 25 and 29, and be seen directly behind the listed building in view 23.
370. Within view 26 of the HTVIA (LVMF 15B.2) the listed building is similarly only just distinguishable, partially visible with a portion of the atrium seen set against the Scalpel. The distant quality of this view is such that it makes only a negligible contribution to the setting and significance of the listed building, only identifiable through extreme magnification. The proposals will screen the listed building within this view, resulting in a loss of visibility. However, given the negligible contribution of this view to the setting and significance of the listed building, the resultant impact to significance is considered to be neutral.
371. Overall, the proposal would preserve the significance and setting of the Lloyd's Building and those of 12 & 14-19 Leadenhall Street which are intrinsically related to one another.

Southwark Cathedral (Grade I):

Significance:

372. Southwark was for many centuries the only substantial settlement on the south bank of the Thames and situated at the end of the only bridge

crossing the river. The original minster and subsequent priory would have been a source of hospitality and accommodation, supplemented over the succeeding centuries by the many inns and hostelries along the adjacent Borough High Street that catered for travellers to and from London. The role of the priory would therefore have been central to the identity and character of the area and its physical presence would have once been much more visually prominent than is the case today. Following the Dissolution, the role of the building as a parish church for an area with a constantly shifting population was slightly different to many others and by the 19th century it was in a very poor condition. It was in danger of demolition to accommodate the new railway infrastructure being introduced into the heart of the capital. The retention and restoration of the church in the 19th century by Gwilt is a key chapter in its history and is obviously expressed architecturally by the embellishment of the crossing tower. The establishment of a new diocese and the award of Cathedral Status in 1905 elevated the ecclesiastical significance of the building in an echo of its former medieval importance so that it now has a significant and substantial role in supporting the varied communities of the area.

Contribution of Setting:

373. The original setting of the then Priory, and later cathedral, comprised the lower inter-tidal stretches of the Thames to the north with the church atop higher ground. The historic crossing of the river, for many centuries the only one in the capital, was a major structure to the east leading to the spine of Borough High Street and its tight urban grain of courts and yards. Although physically separated by its precinct walls from the High Street and the market, the Priory would have been visible in the surrounding areas to east and west until the nineteenth century when the development of significant warehousing, industrial and commercial buildings, many of which were associated with the Port of London to the north, radically changed the setting and visibility of the church. To the east the introduction of the railways elevated above the existing buildings of the High Street and passing in close proximity to the south of the church further isolated it visually from parts of its setting. The visual connection between the church (later cathedral) and the Thames was important historically and continues to make an important contribution to an appreciation of the church, enabling an understanding of its strategic location and the connections between the north and south banks of the river. Changes to the setting of the Cathedral in the 20th century including the creation of Montague Close and Minerva Square has reinforced those connections and provide new views that contribute to the appreciation of the architectural and historic significance of the building. These changes enable an experience of the Cathedral from a quiet public square immediately adjacent to the river which is in contrast to the remainder of the setting of the Cathedral which is busy, noisy and vibrant in parts. The creation of the square and the trees along the

northern edge identify the space in mid-distance views from the other side of the river and draw the eye towards the Cathedral tower, seen for the most part against a clear sky and appreciable as an historic landmark.

Impact

374. View 19 of the HTVIA shows the upper part of the tower of Southwark Cathedral, partially seen in the mid-distance, above the western side of the Borough High Street. The buildings of the high street, which gently curves east, prevent full views of the tower, and in addition, a backdrop of tall buildings is created through sight lines towards Tower 42, 22 Bishopsgate and the emerging 6-8 Bishopsgate. These buildings are visible behind the tower spires, reaching halfway across the tower's width. The proposals will be visible in this view, seen as part of the existing distant tall building cluster. While this will create a change in the backdrop, this is not considered to dilute the prominence of the tower as presently experienced. The proposals will be appreciated very much in the distance, consolidating the appearance of the City Cluster and remaining within its visual built envelope. The overall impact to the significance of the listed building is therefore considered to be neutral, with no change in the contribution of its setting.

81-82 Gracechurch Street (Grade II):

375. 81-82 Gracechurch Street is a good example of a later 19th century purpose-built office building in the Italianate manner, faced in well-detailed Portland stone. A style then associated with dependable business and finance in a City manner, it reincorporates a much older alley and a ground floor parade of shops. Its principal significance lies in its architectural design including façade details of the Gracechurch Street elevation and potentially its interiors. Its subservient secondary facades to Bull's Head Passage survive well, but are more subtle, of traditional white glazed brick and large tripartite sashed windows to optimise light in a dense setting, are of secondary interest. In the main, significance is drawn from the external architecture and plan form. To a lesser extent does it draw on setting.
376. The building's immediate setting makes a positive contribution of two kinds to the significance of the listed building. Firstly, the building is experienced as a small group of classically detailed Portland stone buildings located on the opposite side of Gracechurch Street. The Lombardy classicism exhibited along Lombard Street in particular is considered to establish the sense of a shared architectural decorative language, which sympathetically contextualises the architectural interest of the listed building. The second contribution, albeit to a lesser extent, is the proximity to the western entrance of Leadenhall Market, with its red

brick and Portland stone facades seen together with the listed building from the south and north along Gracechurch Street. The character of the market, with its fine-grained commercial buzz, reinforces the sense of activation of the ground floor commercial units within the listed building. Views of the market and listed building terminate in the tall façade of the Scalpel, which together with the modern building at No 20, break above the established building line. The immediate setting is therefore characterised by a mix of stone fronted buildings of various styles, heights and periods juxtaposed with a backdrop of tall modern buildings seen alongside and behind.

377. The site is located immediately adjacent to the north and contributes positively through the materiality and decorative detail of the second and third storeys of its façade. The roofline of the site terminates significantly above that of the listed building in a series of stepped additions. This roofscape is seen together with the listed building in views north south along Gracechurch Street, undermining this otherwise positive contribution. Similarly, the modern shop fronts and frontage at ground floor of the site appear rather plain and detract from the more evident decorative detail of the surroundings.

Impact:

378. The GLA have commented that the proposals would create less than substantial harm of a moderate level, to the listed buildings, through the creation of a distracting presence in local views, and loss of prominence.
379. There would be no alterations to the party wall between the two sites, and the outline treatment of the junction between the two sites is considered acceptable, with details reserved via condition.
380. The development would be prominent in views north (view 1 and 2) and south (view 6 and 7) of 81-82 Gracechurch Street, with the massing of the development highly visible above the roofline of the building. The retention of the façade to no 85, together with the proposed restoration of decorative detail conserves the positive contribution of the site and resolving the rather plain appearance of the ground floor. While visible, the tall building addition is considered typical of the existing backdrop setting, which as existing features dramatic change of scale. Therefore, the setting is found to not be adversely affected by the proposals and the contribution of the setting to the significance of the listed building would be unharmed.

Former Ship Tavern, Lime Street (Grade II):

Significance and Contribution of Setting:

381. The Classical mid-19th Century public house is located east of the application site in Lime Street and is of architectural and historic interest, through its characteristic stock brick upper façade and traditionally proportioned and detailed frontage below. On the main significance is drawn from the physical fabric and prominent principal elevation to Lime Street, and to a lesser but still significant extent from setting.
382. Setting makes a lesser, moderate contribution to significance, in particular an appreciation of it. This derives from the group value with the adjacent complementary historic buildings to the eastern side of the street, as well as the red brick frontage of the market visible on Lime Street Passage, the latter echoing the proportions and Victorian character of the listed building (View 5a). The rear elevation of the site as existing is seen from the listed building rising significantly over the market. These views appear incidental and utilitarian, creating a 'back of house' character which detract from the views towards the market.

Impact:

383. The GLA consider the proposals would result in less than substantial harm, ranging between a low to middle level of harm, due to a change in backdrop and intervisibility with the listed building.
384. The high-quality architecture of the proposed building would replace the existing poor quality rear facades of the existing building in the wider setting, albeit appreciated peripherally to the experience of, the Ship Tavern. While it is acknowledged the visible extent of the site will increase, this is consistent with the wider character of the listed building's setting, which presently takes in a number of tall buildings. Therefore, the setting is found to not be adversely affected by the proposals and the contribution of the setting to the significance of the listed building would be unchanged and unharmed.

7-9 Gracechurch Street (Grade II):

Significance and Setting:

385. Built in 1919 by W Campbell-Jones as a bank, 7-9 Gracechurch Street is a steel framed building clad in Portland Stone in a French/ Beaux Arts style, creating high historic and architectural interest. It is located on the west side of Gracechurch Street opposite the application site. Its wider setting features a mix of buildings in age, materials, style, and height, retaining a group value with a number of Portland Stone fronted

buildings in the immediate surroundings. The building enjoys a green setting to the rear set around Castle Court.

386. As above, the existing site contributes positively through the materiality and decorative detail of the second and third storeys of its façade. The roofline of the site however terminates significantly above that of the listed building in a series of stepped additions. This roofscape is seen together with the listed building in views north-south along Gracechurch Street, undermining this otherwise positive contribution. Similarly, the modern shop fronts and frontage at ground floor of the site appear rather plain and detract from the more evident decorative detail of the surroundings.

Impact:

387. The juxtaposition of heights and architecture, including the City Cluster of tall buildings has been found to form part of the character of the setting. While the proposal would be highly visible in views east from the listed building, this is not inconsistent with the existing character of the surroundings, which already takes in a number of structures seen over the roofline. The enclosure to castle court is such that views of the listed building from this location are considered to be unaffected. Taken together therefore with the improvement to the retained façade, this results in no adverse impact on the setting of the listed building and its contribution to significance.

Cannon Street Towers (Grade II):

Significance and Contribution of Setting:

388. The pair of towers at Cannon Street Station, at Cousin Lane and All Hallow's Lane, were built 1865-6 possibly by E M Barry and used to mark the junction of the train shed with the bridge. The brick towers feature open arched upper parts, square domed roofs with squat lanterns and spire. Their significance lies in their townscape landmark presence in river views, their architectural quality and functional association.
389. The setting of the towers is characterised by a mix of building styles, heights and periods, which allude to the substantial rebuilding along the northern bank of the Thames during the twentieth century. The riverside setting however makes a strong positive contribution, enabling the landmark quality of the station and its important contribution to its significance. The tall buildings of the City Cluster are seen in the wider

backdrop, creating a dramatic composition in which the station towers appear as a prominent gateway.

Impact:

390. The change in scale within the site as a result of the proposal would not change the character of the backdrop setting, where the towers are appreciated with the tall buildings of the City Cluster seen directly behind. Therefore, while the proposals will be visible in views of towers, the proposal is not considered to detract from the setting of the listed towers. The significance of the listed towers would not be affected by the proposals.

Former Port of London Authority Building (PLAB), 10 Trinity Square (Grade II*):

391. Built 1912 – 22 by Sir Edwin Cooper, this monumental Portland stone landmark building in the Greek classical style features a richly embellished tower. Its setting includes a broad range of buildings in terms of period, style, height and materiality. It forms part of the setting of the Tower of London and is a clearly identifiable landmark feature in river prospect views. Its significance lies in its architecture and historic Port of London civic function, and to a lesser degree its setting including the Tower of London.

Impact:

392. Views 11, 13c and 16 of the HTVIA show the proposed development will appear in views with the PLAB but will not obscure the existing appreciation of its silhouette or decorative detail, forming part of a backdrop of tall buildings within the City Cluster. The cumulative scheme further shows the proposals screened from view in views 11 and 13c, with the proposals seen as part of a gradual amplification of height within the City Cluster seen in view 16. Therefore the robust architectural form and contrasting materiality of the PLAB when compared to the Cluster buildings would remain a prominent element in these views. There would be no harm to the setting of this listed building, or the ability to appreciate its significance, as result of the proposed development.

Lloyds Bank, 39 Threadneedle St (Grade II)

393. Designed in the late nineteenth century by G H Hunt the building is a stone classical building with rounded corner. Historic and architectural

interest is created through elaborate decorative detail and the polychromatic effect of the oxford and Portland stone of the main façade. The building has a local landmark presence, holding a responsive character to the road junction. Its setting is varied, comprising the sombre Portland stone buildings to Threadneedle Street and the western side of Gracechurch Street. These are of a similar scale and decorative quality, creating a sense of consistency in the streetscape which underscores the listed building's architectural interest. In contrast, the tall buildings to the eastern side of Gracechurch Street, including 22 and 10 Bishopsgate, possess a firm contemporary character and relatively monumental height, creating distinct duality and sense of drama within the surroundings.

394. The GLA has found a low to middle level of less than substantial harm to the significance of the listed building through intervisibility with the proposals and alterations to the listed building's backdrop. This is addressed below.
395. The site is visible in views which take in the listed building from the junction, seen in the middle distance. These views include the front façade of the site as well as the stepped additions to the roof, creating a considerable mass of structure above the roof line. The proposals will be visible in these views (View 1 within the HTVIA) but seen and appreciated as a continuation of the tall buildings to the west. As such the proposals are considered to maintain the existing sense of duality appreciable within the listed building's setting. There would be no harm to the setting of this listed building, or the ability to appreciate its significance, as result of the proposed development.

Royal Exchange (Grade I):

Significance and Setting:

396. The Royal Exchange is one of the most recognisable buildings within the City, located prominently at Bank junction. Designed by Sir William Tite the building possesses a richness of style which exemplified the wealth of Empire as well as the end of the Georgian Neoclassical revival period. Its historical use and commanding presence create a very high architectural and historic interest.
397. The setting of the listed building comprises the grand cluster of Portland stone buildings facing Bank junction, including the Bank of England and No 1 Cornhill. The alignment of the group towards the junction contributes to a sense of arrival which compliments the richness of their architectural detail. The Royal Exchange appears centrally within this composition, drawing the eye through its grand temple frontage. Views

east from the junction take in, the tall buildings of the City Cluster seen in the backdrop. The duality of this view has come to symbolise the continued success and evolution of the City and contributes greatly to the listed building's setting. The overall contribution of setting to the significance of the building is high.

Impact:

398. The GLA have considered the proposals to result in less than substantial harm, ranging between a low to middle level of harm, due to changes in backdrop and intervisibility between this building and the site.

399. The site is presently not visible from the listed building, making a neutral contribution. The proposals will be seen in views east from Bank Junction taking in the Royal Exchange. In the baseline scenario, the site will appear part of the City Cluster, adjacent to the Scalpel. As such the proposals will appear consistent with the existing tall building backdrop setting. The isolation of the proposals in this view will be softened in the cumulative scenario, specifically seen together with 1 Leadenhall. Given the compliance with the existing setting, it is considered there would be no harm to the setting of this listed building, or the ability to appreciate its significance, as result of the proposed development.

1 Cornhill (Grade II):

Significance and Setting:

400. A grand Classical building of rusticated Portland stone with an iconic rounded corner supporting dome, built in 1905. Its significance lies in its high architectural quality and landmark presence in views looking east from Bank Junction and Cheapside. It is situated at the junction of Cornhill and Lombard Street and the surrounding heritage buildings of distinction make up its immediate setting and contribute to its significance. The wider setting is characterised by the visibility of tall, modern buildings which is part of its character and does not detract from the significance of the listed building.

Impact:

401. The GLA has found a low to mid level of less than substantial harm to the significance of the listed building through intervisibility with the proposals and alterations to the listed building's backdrop. This is addressed below.

402. View 30 within the HTVIA takes in the curved corner formed by no.1 Cornhill looking east from Bank Junction. The proposed development would appear in the background of this view, well away from its dome. The significance of the listed building and the ability to appreciate it are considered to be unaffected, with the proposals remaining identifiably part of the existing City Cluster of tall buildings which presently form a backdrop within this view. Therefore, it is considered there would be no harm to the setting of this listed building, or the ability to appreciate its significance, as result of the proposed development.

13-14, 23-27, 28-30, 33-35, 39, 48 50 Cornhill (Grade II) and 15-22 Cornhill (Grade II*):

Significance and Contribution of Setting:

403. This group of listed buildings is seen to the southern side of Cornhill, comprising a sedate row of Portland stone buildings, with the exception of the pink and grey polished granite frontage to No 39.
404. 15-22 Cornhill is the largest building within the group, occupying a substantial plot. Built in 1927 by Sir John Burnet as the Lloyd's Bank Headquarters, the building is of much historic and architectural interest, awarded a RIBA award in 1932, with well-preserved interiors. The façade design has a palatial quality, with a series of double height arched windows at ground floor and giant order of Corinthian columns above.
405. The decorative treatment of the group varies, but each is of a consistently high quality and roof height, so that the sense of a cohesive eighteenth to early twentieth century townscape is appreciable. The close proximity of this cluster of listed buildings creates considerable group value, experienced sequentially and in longer range views east along Cornhill. The overall architectural and historic interest of the buildings are high.
406. The setting of the group includes the buildings around Bank junction, with a number of landmark structures such as the Royal Exchange and 1 Cornhill creating an emphasis to this important junction location. These buildings frame the view east along Cornhill, terminating in glimpses of the Lloyds Building and Scalpel. Views west centre on No 1 Poultry, the grade II* postmodern building by Sir James Stirling. The tower of St Michael Cornhill is seen fleetingly above this group when walking east along Cornhill, creating a point of interest, and signposting the historic origins of the street. The City Cluster is also seen in eastern views along this road, creating a backdrop that comes in and out of view as the

viewer progresses east. The setting of the listed group therefore comprises the strong interrelationship between the buildings within the terrace, set against taller more modern buildings which terminate these views and appear within the wider backdrop.

Impact:

407. The GLA has found a low-mid level of less than substantial harm to the significance of the listed buildings through intervisibility with the proposals and alterations to the listed buildings' backdrop. This is addressed below.
408. The site is presently not visible from the listed group, as illustrated in views 31 of the HTVIA. The proposals will result in an increase in visibility, appearing above the prevailing building height of the group. This is however consistent with the existing character of the setting, with the terrace experienced alongside views of tall buildings within the City Cluster. The overall impact is therefore considered to be neutral. It is considered there would be no harm to the setting of this listed building, or the ability to appreciate its significance, as result of the proposed development.

Credit Lyonnais, 39-40 Lombard Street (Grade II):

Significance and Contribution of Setting:

409. Built 1868, by Frederic John and Horace Francis, this Portland Stone building is completed in an ornate Italianate palazzo manner. Comprising a tall ground floor, thought to be a former banking hall, the main facades are richly carved with classical detailing. It is of architectural, artistic and to a slightly lesser extent historical interest. Its immediate setting is characterised by a number of contemporary Portland Stone commercial buildings which are evidently modern in character. A historic setting is better preserved along Lombard Street, but the overall contribution of the setting to the significance of the listed building is considered to be moderate. The tall buildings within the city cluster are seen to the north, including 6-8 and 22 Bishopsgate, further cementing a modern architectural character to the surroundings.
410. The site is seen obliquely from the listed building, visible within the middle distance of views north. It makes a low positive contribution to the setting and significance of the listed building, with the main façade seen forming a cohesive and attractive group with the neighbouring Portland stone buildings to either side.

Impact:

411. The GLA considers that the proposal would result in less than substantial harm, ranging between a low to middle level of harm, due to the change in backdrop and intervisibility with the listed building.
412. The proposals would be appreciated in open northward views along Gracechurch Street however this would be viewed in the context of the existing office developments in the immediate setting and tall buildings of the City Cluster in the background. The retained façade of the existing building ensures the positive contribution that the site makes to the setting of the listed building is preserved. As such the proposals are considered to be consistent with the existing character of the setting. Therefore, no harm would be caused to the special interest, significance or setting of 39-40 Lombard Street.

St Paul's Cathedral (Grade I):

Significance and Contribution of Setting:

413. London's and one of the nation's most famous landmarks, it was London's first cathedral and one of the earliest sites of Christian worship in Britain, now identified as one of one of London's two Strategically Important Landmarks, being also the seat of the Bishop of London, the mother cathedral of national and international Anglican church, a ceremonial centre and the backdrop of royal and state ritual and pomp and the final resting place of figures central to the national story, a place of national commemoration and celebration. It is the masterpiece of seminal national figure and architect Sir Christopher Wren (with input from other notable designers and crafts people overtime) and of the distinct English baroque style. It was central to the adoption of classical architecture in Britain, and symbolic of the restoration of London post Great Fire as a major European political, cultural and economic capital. It is of outstanding national and even international heritage significance. That significance is architectural, historic, artistic, archaeological, evidential and communal (social, commemorative, spiritual and symbolic). This significance is inherent in the iconic architectural form and composition, and in its plan form, fabric and those memorialising fixtures comprising statuettes to mausoleums.
414. In terms of setting, for hundreds of years it was the tallest building in London. It was strategically sited atop Ludgate Hill, a rare topographical moment in City of London and one of its highest points, with a commanding position overlooking the River Thames. Following the great rebuilding act (1667), Wren had little influence over the even immediate, never mind wider, setting. The setting has been substantially altered over time often with the setting of the Cathedral at its heart, and to

various degrees those elements together make a substantial contribution to significance and an appreciation of it, in particular the architectural, artistic, historic and communal significance. Those contributing elements are deemed in descending order of importance;

415. Those wider strategic plan-London riparian views from the Thames, it's embankments and bridges which are often iconic and London defining, and where St. Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches. These make a substantial contribution to significance and an appreciation of it.
416. The ancient processional route of royal and state national significance along The Strand/ Fleet St, a 'national spine' of celebration and contemplation, along a route between the heart of government in Westminster and commerce in the city, where St. Paul's is the pre-eminent culmination and destination of a picturesque sequential townscape experience at the heart of London's and the Nation's identity. This makes a substantial contribution to significance and an appreciation of it.
417. Those wider pan London views and approaches where the Dome offers a skyline presence in broad identity defining London panoramas, for example those from strategic views identified in the LVMF, including Parliament hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others, some of which are subject to local designations.
418. These include old and newer high-level appreciations of the London skyline which allow the cathedral to be better understood as part of London's wider natural and cultural topography, including from the monument and higher level public viewing gallery such as the Sky Garden at 20 Fenchurch street, One New Change and emerging viewing terraces in the City Cluster. These make significant to moderate contributions to significance and an appreciation of it.
419. Those more immediate, often incidental, some more planned, townscape appreciations, which have resulted in ad hoc and some active townscape curation over the generations, in particular from St Peter's walk (South transept axis), Cannon Street, the Paternoster Square development, amongst others, where the cathedral soars above and dominates its immediate surrounding as the defining skyline presence. This makes a moderate/significant contribution to significance and an appreciation of it.

Impact:

420. The height and form of the proposals have been shaped with reference to the long-term strategic skyline curation of the City which, in turn, has been directly informed by St Paul's. The overall height and form of the designs have been altered in order to preserve the skyline setting of St Paul's from the processional approach along Fleet Street. The proposed building has also been designed to assist in the long-term consolidation and singular coherence of the City Cluster, where this is visible in strategic riparian views, assisting and subduing the isolated bulk of 20 Fenchurch Street. Assisting the consolidation of the City Cluster will in turn soften the backdrop impact on the Cathedral. At no point would the Cathedral's pre-eminent location of the wider skyline, in broad panoramas or close up views, be prejudiced by the proposal. The enormous significance of the Cathedral would be preserved by the proposal.

421. The HTVIA has exhaustively tested views where the proposals will have an impact upon the setting of the cathedral, including relevant LVMF viewpoints, illustrated within views 9, 14, 16, 22, 24, 25, 26, 27a, 27b, 27c, 28, 35, 36, 37, 38, 39, 40 as well as appendix E. In all cases the proposal has been designed to be either occluded by the cathedral dome, or where visible, seen to form part of the established cluster of tall buildings, and read a distant feature on the City's skyline. The impact of the proposals on the significance of the listed building is therefore considered to be neutral, preserving the contribution of setting.

No 37 & 39 Lime Street (Grade II):

Significance and contribution of Setting:

422. 37-39 Lime Street hold modest architectural and historic significance, comprising a 1920s office building constructed in a neo-classical style. Designed by Leo Sylvester Sullivan, the building is of Portland stone, and features decorative details of note including a pedimented doorway with mounted acroteria and acanthus stone leaves, Tuscan piers as well as brown metal aprons to the fenestration.

423. Group value is created with the adjacent buildings to the eastern side of the street with the consistency of scale and tight curve of the road enhancing the sense of an enclosed historic streetscape within the immediate vicinity. The wider surroundings include views of tall buildings, including 20 Fenchurch Street, seen prominently to the south and The Lloyd's Building seen to the west. Views of the eastern entrance into the market are glimpsed along Leadenhall Place. The rear elevation of the site is just seen behind the Lloyds building, rising over the market. These views appear incidental and utilitarian, creating a

'back of house' character which detract from the views towards the market. The overall contribution of setting to the significance of the listed building is considered therefore to be mixed, both positive and neutral.

Impact:

424. While it is acknowledged the visible extent of the site will increase, this is consistent with the wider character of the listed building's setting, which presently takes in a number of tall buildings. Therefore, the setting is found to not be adversely affected by the proposals and the contribution of the setting to the significance of the listed building would be unchanged and unharmed.

7 & 9 Bishopsgate & The Royal Bank of Scotland (Grade II):

Significance and Contribution of Setting:

425. Nos. 7 and 9 Bishopsgate and The Royal Bank of Scotland are notable for their striking facades. 7&9 Bishopsgate possesses a polychromatic character, created through the use of stone and pink marble whereas the Royal Bank of Scotland uses a double height ionic colonnaded arcade to the main frontage with foliate swags above. Both are nineteenth century in date and hold high architectural and historic interest, contributing to their overall significance.

426. The setting of the buildings is varied, comprising the sombre Portland stone buildings to the western side of Bishopsgate and Gracechurch Street. These are of a similar scale and decorative quality. In contrast the tall buildings to the eastern side of Gracechurch Street, including 22 and 10 Bishopsgate possess a robust contemporary character and relatively monumental height, creating distinct duality within the surroundings.

Impact:

427. The site is visible in views that take in the listed buildings from the junction with Threadneedle Street and along Bishopsgate, seen in the middle distance. These views include the front façade of the site as well as the stepped additions to the roof, seen to add a considerable mass of structure above the roof line. The proposals will be visible in these views (View 1 within the HTVIA) but appreciated as a continuation of the tall buildings to the west preserving the existing sense of duality within the setting. There would be no harm to the setting of this listed building, or

the ability to appreciate its significance, as result of the proposed development.

2a Eastcheap (Grade II):

Significance and Contribution of Setting:

428. Built in 1910-11 by Frank Sherrin, the building retains high architectural and historic interest through its characteristic early twentieth century appearance, including retained ground floor shopfronts. Decorative features include crouching Atlantes on Ionic pilasters, supporting semi-circular pediment above and octagonal turret with ogee lead roof and weathervane.
429. Its immediate setting is characterised by a number of contemporary Portland Stone commercial buildings several of which are evidently modern in character. The building is seen together with the monument, seen in views down Fish Hill, making a positive contribution to the setting. The overall contribution of the setting to the significance of the listed building is considered to be moderate. The tall buildings within the city cluster are seen to the north, further cementing a modern architectural character to the surroundings.
430. The site is seen obliquely within the middle distance of views north. It makes a neutral contribution to the setting and significance of the listed building, with the main façade seen forming a cohesive and group with the neighbouring Portland stone buildings to either side, and the towering form of 122 Leadenhall above.

Impact

431. The proposals would be appreciated in open northward views along Gracechurch Street, however this would be viewed in the context of the existing office developments in the immediate setting and tall buildings of the eastern cluster in the background. The retained façade of the existing building ensures the existing proportions and material character of the site's lower floors continue to be appreciated. As such the proposals are considered to be consistent with the existing character of the setting. Therefore, no harm would be caused to the special interest and significance of the building through alteration within its setting.

7-8 Philpot Lane (Grade II*):

Significance and Contribution of Setting:

432. Much altered terrace, dating from the late 17th century, substantially redeveloped in c.1984 and again refurbished in 2018 leaving little

authentic fabric. Italianate style, stucco-fronted brick terraces, with clay tile clad hipped roofs. The principal significance lies in the basement interior, a rare and unique late Medieval vaulted undercroft. It is of high architectural, historic, and archaeological significance, less so artistic. It draws a moderate degree of significance from setting, in particular, as a group around Brabant Court and in association with 4 Brabant Court, 2-3 and 5 Philpot Lane. Together these form a rare and unique ensemble of the form and urban grain of the pre-industrialised, pre and immediately post-Fire City of London – comprising smart brick-faced terraced commercial fronts and quieter, intimate off-street domestic/cottage industry courtyards.

Impact

433. The proposal would be appreciated in the context of the emerging Cluster in the immediate and wider setting from Philpot Lane. . These dramatic contrasts in scale between the old and new are an established character trait of this setting which otherwise in terms of physical form, layout and appearance would be undiluted – that relationship between the ensemble remaining appreciable. In closer views, the listed building will continue to dominate. It is considered the proposal would preserve the special interest/significance, and the contribution made by setting to the significance of 7-8 Philpot Lane.

St Mary Woolnoth (Grade I):

Significance and Contribution of Setting:

434. The distinctive English Baroque Church of St Mary Woolnoth, built 1716-1727 by Nicholas Hawksmoor, is the parish church of the Lord Mayor of London. The Portland stone principal west front comprises an original composition of double height rustication with Tuscan columns and a tower of twin turrets, crowned by coupled lanterns. It is of very high architectural, historic, artistic and archaeological significance. The unique work of English Baroque architecture is an arresting landmark at the centre of the City of London.
435. Its prominent siting at the junction between King William Street and Lombard Street from the heart of the City at Bank Junction, is set amongst a panorama of fine classical commercial, civic and in this case, religious, monuments from all eras. This makes a medium contribution to the significance of the Church.

Impact

436. The proposal will appear in the backdrop of the Church in views from the west, in particular in views along Lombard Street. The foreground of Portland Stone classical buildings are presently backdropped by Cluster

of tall buildings behind, creating a theatrical contrast in scale and character between the old and new City. The Church in part is backdropped by 20 Fenchurch Street and the proposal would form part of that wider backdrop, forming a kinetic and transient relationship. From the junction of Lombard Street and King William Street the Church will remain the pre-eminent foreground monument with a skyline presence. Given the transient nature of the impact, it is considered that the magnitude of impact would be minor and that no harm to the significance or setting of the church would arise, especially given the significant distance of the proposal to the east. The Church would still have a sky-backed skyline presence in important local views, and it would remain a prominent City landmark and skyline feature.

Bank Conservation Area:

437. The proposal will be visible from a number of vantage points within the Conservation Area.
438. The majority of the Conservation Area interior comprises a dense, tight-knit urban grain with a strong sense of enclosure to the street, establishing the sense of an intact historic townscape. High historic interest stems from notable surviving buildings from the 18th and 19th centuries, with a strong sense of group value expressed through the shared use of solid masonry facades, abundant classical modelling, and surface detail. A long-held concentration of banking and commercial activities has created a historic nexus of financial power and with its high historic associative interest. This is expressed through the sense of dramatic arrival at bank junction, experienced as a central node within the historic urban realm, and enhanced by the palatial quality of the Royal Exchange and Bank of England, which face onto the junction.
439. The setting of the Conservation Area is as varied and diverse as the overarching character of the City. Its most obvious border is with the City Cluster on the eastern edge, where there is a striking contrast in scale on opposite sides of Bishopsgate/Gracechurch Streets, mitigated. The wider setting of the Conservation Area is characterised by a backdrop of tall buildings to the east and strong juxtapositions between old and new. The character Bank junction as a historical centre is therefore presently offset by views of tall buildings within the City Cluster to the east. The setting of the conservation area therefore makes a range of contributions to its significance, both neutral and low positive.
440. The site at present makes a neutral contribution to the setting of the conservation area, seen in north south views along the eastern boundary of the conservation area at Gracechurch Street. The decorative quality of the upper floors to the main façade is undermined

by the loss of the original ground floor and indifferent, plain design of the extensions above parapet level.

Impact

441. The GLA considers that the proposal would result in less than substantial harm, ranging between a low to middle level of harm, due to a change in backdrop to the conservation area and intervisibility. This is addressed below.
442. The proposal will be visible from Bishopsgate/Gracechurch and Threadneedle Streets, Bank Junction as well as east along Cornhill. In those views north and south along Bishopsgate/Gracechurch Street the proposal would read part of the cumulative Cluster of tall buildings, including emerging developments at 1 Leadenhall Street, 55 and 70 Gracechurch Street. Here the proposals are considered to contribute a high-quality contemporary addition that, while of a differing scale, retains a positive dialogue with the scale and proportions of the Conservation Area opposite. This is achieved through the retention of the existing façade to Gracechurch Street and set back of floors immediately above the existing parapet. Therefore, the proposal would form part of that prevailing contrast in scale on the eastern border of the Conservation Area, whilst retaining those aspects of the site which currently make a positive contribution to its setting.
443. It is acknowledged that the upper floors of the proposals extend in a gradual curve beyond the existing building line, and this will be appreciable, however as illustrated in views 6 and 7, when considered alongside consented schemes, the projecting quality of the proposals will be softened, seen to be sitting within a visual envelope already defined by contemporary architecture.
444. In views east from Bank Junction the proposal will be visible in the backdrop, seen alongside the buildings of the city cluster including 1 Leadenhall Street. Comments received from Historic England have considered that the impact to views east along Cornhill diminish the positive contribution of the tower and create a harmful impact to the conservation area. Specifically this is in light of the proposals creating a fleetingly appreciable backdrop to the tower of St Michael Cornhill, at the junction of Cornhill where it meets the Royal Exchange Buildings. This interaction between old and new is not an unusual relationship in the Conservation Area, with views of the City cluster frequently seen in the dynamic contrast with the historical City in the foreground.
445. Fundamentally the current appreciation of a tightknit historic streetscape within the conservation area will remain undiluted. Additionally the proposals will preserve the majority of views towards St Michael Cornhill. Nevertheless, such is the contribution of the specific viewpoint identified

above to the church's setting and significance, and in turn, its contribution to the conservation area, that the proposal is considered to cause a slight, low level of less than substantial harm to the significance of the Conservation Area.

Chapel Royal of St Peter ad Vincula (Grade I):

Significance and contribution of setting:

446. Constructed in ragstone rubble and flint with worked stone dressings, the site of the chapel has been a place of worship since the 9th century, with the current iteration of the building dating to the sixteenth century. Its high architectural interest stems from its rarity value as a 16th century chapel with retained flint covered tower and 17th century wood bell cupola. Beyond the high archaeological interest in the church's fabric, including preserved Tudor liturgical furniture to the interior, the church holds exceptional associative historic value as the resting place of Anne Boleyn, Thomas More and Lady Jane Grey amongst others.
447. The setting of the chapel makes an exceptionally high positive contribution to the significance of the listed building. The historic associative and commemorative value noted above is amplified through proximity to the White Tower and the location within in the Inner Ward. This yard is intimately connected with an appreciation of the building's historic interest, comprising the dramatic staging of execution for many of those interred in the chapel. The chapel's placement within an otherwise military and fortified setting is also powerfully illustrative of the theocratic nature of Tudor London. More generally the immediate verdant setting of Tower Green also provides a pleasing open approach to the chapel. Views from within the Inner Ward are enclosed by the surrounding walls, but more distantly to the south of the chapel these views take in the City Cluster, with tall buildings comprising an established part of the chapel's wider setting in the baseline, and especially in the cumulative scenario.

Impact:

448. Historic England have raised concerns over impacts to the setting of the church and views towards its tower from certain viewpoints within the Inner Ward, concluding a minor low level of less than substantial harm. It is noted that similar, even greater, impacts in the cumulative scenario have not attracted concern from HE, including the consent (now implemented) 1 Leadenhall, 1 Undershaft or 22 Bishopsgate.
449. The proposed development will be visible from the Inner Ward seen as part of the backdrop of the City Cluster, between 20 Fenchurch Street,

assisting in the consolidation of the City Cluster as a singular urban form, as, illustrated in views 13A and 13B in the HTVIA. View 13B shows the proposals visible behind the Chapel bell tower, terminating below the tower parapet, but joining with its eastern flank and merging with its silhouette. The lantern bellcote of the Chapel would however be unaffected and remain seen against an open sky backdrop. It is noted this view is transient and fleeting, with the proposals disappearing from sight as the chapel is approached and when the green to the south of the chapel is reached, illustrated in Figure 8.38 of the HTVIA. When considered in alongside the cumulative scenario, the proposals no longer constitute the loss of an unbroken silhouette, with consented proposals at 70 Gracechurch Street also appearing to the tower's left and reaching above its parapet.

450. The impact of change to this view is considered to be mitigated due to its fleeting quality and more general compliance with the wider and evolving tall building context. As such the proposal is considered to result in a neutral impact to the significance of the Chapel Royal of St Peter ad Vincula, preserving the existing contribution of setting described above.

Non-Designated Heritage Assets

451. A scoping of the wider setting has been made to ascertain whether, in Officers view, the proposed development has the potential to affect the significance of any building/structure which is of itself of sufficient heritage significance to warrant consideration as a non-designated heritage asset. The following assets were identified as a result of that scoping exercise.

Nos. 1-4 Bull's Head Passage:

Significance and Setting:

452. This modest early-mid nineteenth century range of shops, with office and ancillary accommodation above holds architectural interest by virtue of their characteristic late Georgian/early Victorian appearance. Constructed of stock brick with retained sash windows and a rounded corner to their eastern end, they are illustrative of the small-scale mixed use commercial development common to the City and wider capital prior to Victorian and later rebuilding. Additional historic associative value is established through connection to the Skinner's Company. The building therefore retains moderate historic and architectural interest and is considered a positive contributor to the surrounding Conservation Area sufficient to be considered a Non-Designated Heritage Asset.

453. The setting of the buildings comprises the very narrow lanes surrounding Leadenhall Market, establishing a sense of intimacy and enclosure and limiting the extent within immediate surroundings where the shop row is appreciable. The buildings hold group value with the market itself, forming part of a wider nineteenth century townscape overlaid onto a medieval street pattern. To the north and east, views into the entrance of the lane take in the tall buildings of the City Cluster, creating a backdrop to the immediate Victorian townscape of the lane itself. The overall contribution of the setting to the significance of the non-designated heritage asset is significant and moderate.

Impact:

454. The proposed alterations to the party wall would be minor and would present a clean, simple backdrop to the buildings. Full details of these interfaces are to be reserved via condition.

455. Despite its relative proximity, the site is not appreciable within the lane, due to the considerable sense of enclosure along the passage, only coming into view beyond the lane's eastern entrance, towards the junction of Lime Street and Lime Street Passage. These views take in the indifferent upper floor and rear façade of the existing structure, making an adverse contribution to the setting of the shop group beyond the passage. While the proposals will introduce a change within this view, this is not inconsistent with the current character of the surroundings beyond the immediate setting of the lane interior. Views within the lane themselves, where the architectural quality of the buildings are best appreciated, are considered to be preserved due to the narrow field of view created by the lane width. The impact upon the contribution of setting and significance of 1-4 Bulls Head Passage is therefore considered to be neutral and it would be unharmed.

85 Gracechurch Street, Principle of Redevelopment

456. The existing, unlisted building on the site was completed in 1935 as an office building to designs by E. Howard and Partners. The façade to Gracechurch Street possesses a degree of architectural interest, recognised by the building's inclusion in the Leadenhall Market Conservation Area; its status as a Conservation Area building has been assessed in detail. Otherwise, the building has been considered against the relevant criteria in Historic England Advice Note 7 as a potential non-designated heritage asset. It is considered that the building's elevations are unexceptional and are not considered to possess sufficient architectural interest; moreover, the building is not considered to hold any associations with events, individuals or organisations of historic interest. It is not of an age, landmark status or rarity above the norm; it

does not possess standout group value. As such, it is not considered to be a non-designated heritage asset in its own right.

457. As such, the proposed demolition of the existing building except for the retained Gracechurch Street façade is considered acceptable, in principle.

Other Heritage Assets

458. Setting of a heritage assets is defined in the NPPF as “The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.” Given the dense central London location, the site is within the setting of a large number of heritage assets. As part of the application process a scoping exercise was conducted so as to identify heritage assets the setting of which may be affected. The HTVIA (at Table 8.1) includes a list of heritage assets which were scoped in and out. The designated heritage assets considered included:

Custom House, Grade I
Old Billingsgate, Grade I
Church of St Clement, Grade I
Merchant Taylors Hall, Grade II*
Adelaide House, Grade II
2 Royal Exchange Buildings, Grade II
6 and 7 St Mary at Hill, Grade II
123 Old Broad Street, Grade II
66 and 67 Cornhill, Grade II
Gateway to the yard of Church of St Peter, Grade II
23 and 25 Eastcheap, Grade II
48 Bishopsgate, Grade II
40 Threadneedle Street, Grade II
2-3 Philpot Lane Grade II, amongst others, including all the various listed buildings which substantially comprise the Eastcheap, Guildhall, Finsbury Circus, St Helen’s Place and Tower Conservation Area (London Borough of Lambeth).

459. The settings and the contribution they make to the significance of the heritage assets which were scoped out of consideration, would not be affected by the proposals due to the relative distance of the proposal, and the proposed development will not impact on the roofscape silhouette of the listed buildings with existing fabric blocking the view of the proposed development in the backdrop. In addition, it is the view of your officers that the proposed development would not harm the setting or the contribution that the setting makes to the significance of these heritage assets. The assets assessed in detail in this report are those

affected by the proposed development. Other assets have been scoped out of consideration for the reasons given in the HTVIA (your officers agree with that scoping exercise). Your officers consider that the identification of heritage assets which may be affected, and the assessment of impact on significance as set out in the HTVIA and in this report, are proportionate to the significance of the assets and to the nature and extent of the proposed development. Your officers are confident that the analysis that has been undertaken is sufficient to identify the heritage assets which may be affected, to understand their significance, and to assess impact on that significance.

Conclusion on Heritage:

460. Overall, a low level of less than substantial harm has been found to the significance of the Church of St Michael Cornhill (Grade I), and slight levels of less than substantial harm to the Bank Conservation Area and Tower Bridge (Grade I). Otherwise, the significance and contribution of setting of a broad range of designated heritage assets would be preserved. On balance, accounting for the unique site-specific circumstances and facts of the case, the proposal in this instance (considered in its entirety) would preserve and result in a minor enhancement to the heritage significance of the Leadenhall Market Conservation Area.
461. The scheme is design-led and has accounted for strategic heritage considerations, having been designed to accentuate the unique characteristics and spirit of the place, whilst preserving strategic views from Fleet Street and the River. It has been found that the proposal would result in minor enhancement of a number of strategic views.
462. The benefits and harms will be considered as part of the paragraph 202 NPPF balancing exercise, and in the final planning balance at the end of this report.

Archaeology

463. The site lies over part of the buried remains of the first century AD forum and basilica of Roman Londinium, which was superseded by a much larger second forum-basilica complex between AD 100 and AD 130. 85 Gracechurch Street overlies the north-east corner of the first forum and basilica and a section of the eastern parts of the second forum courtyard and eastern range of second forum buildings. The forum-basilica has very high archaeological and historical significance for its role in the history of the day to day government and economic life of London and the Roman province of Britannia. The basilica would have been home to

the civic administration and the forum was the central marketplace from the late 1st to the 3rd century.

464. The forum-basilica complex has been rediscovered in a series of archaeological excavations and 'rescue' recording exercises conducted through the 19th and 20th centuries. Its extent, layout and survival are now reasonably well understood but many details remain to be resolved and its significance is not yet easily experienced by the public. It is important to consider this application in relation to the forum-basilica complex as a whole rather than treating the application site in isolation. The supplementary information supplied by MOLA includes their estimate of survival levels across the forum-basilica which vary from complete loss to predicted partial or good survival. MOLA estimate that about 25% of the archaeological remains were removed in the 1930s when the current building was constructed. The excavations for the new foundations were recorded by an archaeologist and provide good evidence for the likely nature of survival on the site. It is believed, on current evidence, that the remains surviving below the current basement floor likely relate to floor surfaces and foundations but there is still some potential for upstanding remains relating to the forum-basilica, particularly at the western end of the site. Other archaeological remains of Roman, medieval and post-medieval date, probably also survive on the site.
465. The Cultural Plan includes a comprehensive public benefit offer, including exhibition space and several public engagement programmes, carried out in conjunction with MOLA and Museum of London.
466. The proposed development includes four basement levels within the existing basement footprint, reuse of some of the existing piles, new pile capping beams, additional foundations on the west and south-east sides of the site and a small extension to the west area of the basement. The additional foundations and extended basement would have an archaeological impact.
467. An Alternative Basement Concept has been submitted to accompany the Environmental Statement, which outlines an alternative option for the basement depending on the significance and survival of the remains present on the site. The Concept also highlights that reuse of the original 1930s foundation excavation areas for new foundations should be explored to see if this is feasible. The Alternative Basement Concept option which promises to reduce the archaeological impact of the development and could increase the heritage-related public benefit if basement 1 were to be used for display of the first forum instead of a plant room as the amended scheme plan implies.

468. The final layout of the basement is secured by condition and the proposals are acceptable subject to conditions to cover details of a programme of archaeological work and foundation design.

Public Access and Inclusivity

469. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2036 and policy D5 of the London Plan.
470. Short-stay visitor cycle parking would be located at the ground floor level public hall by an automated cycle stacking facility. Five accessible Sheffield stands would also be provided. Long-stay cycle parking for the office employees would be located at basement level 3 with a total of 505 spaces. Access to the cycle spaces would be achieved via two cycle lifts from the ground floor public hall. The proposed provision of cycle parking across the site would include 5% of spaces (26) that are able to accommodate a mix of larger cycles ensuring that the requirements of the LCDS (2014) are achieved.
471. While the development is car free, it is acknowledged that the closest Blue Badge parking spaces are located on George Yard, 230m to the west of the site. In addition, two bays are located on Gracechurch Street on both the northbound and southbound carriageway.
472. In terms of changing accommodation/end of trip facilities, separate sex changing facilities would be located at basement level 3 including a unisex wheelchair accessible shower and WC. Access to basement level 3 would be step free. An accessible baby changing facility would be provided within the ground floor accessible WC.
473. At ground floor level the public hall would be double-height providing permeability through the site from east to west. Three retail units would be proposed at ground floor and two retail units at first floor, which would be accessed by a passenger lift to the east of the floorplate. Two sets of steps are proposed for these retail units, one of which would be a spiral staircase. Office spaces at levels 2 to level 4 would be accessed via two public lifts at ground floor level, which would also serve the community space at fifth floor level. The office reception would be located at second floor level and would be accessed via the two public lifts or escalators from ground floor level. Subsequent office levels would be served via passenger lifts from levels two and three. Details of vertical circulation such as lifts and steps would be requested via a planning condition.
474. Horizontal circulation such as the effective clear widths of internal doors and security barriers, widths of corridors and passing places and

circulation routes would be step-free and would meet minimum requirements and are satisfactory.

475. Self-contained WC compartments and wheelchair-accessible WC's are proposed throughout the site with a choice of left and right handed transfer on alternate floors. Details of the proposed accessible WC's and ambulant disabled cubicles would be secured via a planning condition to ensure the correct minimum layouts and dimensions of these units.
476. The publicly accessible community spaces with terrace at fifth floor level would be fully accessible for wheelchair users. Details of the terrace area would be secured via a planning condition to ensure that terrace doors, thresholds, access routes and widths and surfaces are sufficient. Conditions requiring details of the landscaping for the terrace are recommended, and should include full details on paving materials, layout and seating designs for assessment against accessibility and inclusivity standards and best practice.
477. Safe, efficient egress depends upon a combination of management procedures and building design. Two fire-fighting lifts are proposed for evacuation until the fire and rescue service arrive. Should the fire-fighting lifts become unavailable (due to these being under the control of the fire brigade) there are two dedicated evacuation lifts (upgraded goods lifts) available that building management could use to assist occupants to a place of ultimate safety.
478. Overall, the proposal accords with the access policies outlined above. The step-free access into the site on all the entrances and internally is a great benefit towards an inclusive City for all and is welcomed as part of the proposals.

Cultural Strategy

479. Local Plan policies CS11 and DM11.2 and draft City Plan 2036 Strategic Policy S6 encourage new cultural experiences and art works. A Cultural Plan has been submitted in accordance with draft City Plan 2036 Strategic Policy S6.
480. A Cultural Plan has been prepared by the Museum of London Archaeology which draws on contributions and input from a wide range of stakeholders including the EC BID. The plan sets out cultural strategy for the proposed scheme with a strong focus on rejuvenating the Leadenhall Market as a retail and cultural destination. A new public hall (measuring 435 sqm NIA) is proposed as an extension to the market at ground floor. The public hall creates a public route from Gracechurch Street into Lime Street Passage, providing better access and improved permeability into the Leadenhall Market. This space is designed flexibly to provide a wide range of cultural activities and a range of pop-up uses

such as exhibitions, artistic and retail events and market spaces to complement the retail activities within the Leadenhall Market.

481. In addition, a Heritage Garden (measuring 429 sqm NIA) comprising a series of publicly accessible spaces is proposed on the fifth-floor level. The Museum of London as the cultural content partner is responsible for curating cultural opportunities for this space with a particular focus on display of archaeological artefacts and VR experiences. This floor also provides green spaces with an external walkway for visitors to appreciate rooftop views over the Leadenhall Market.
482. The public spaces within the building will be managed by a cultural project manager who will identify content partners to programme the art installations and events and ensure that the programme aligns with the aspirations of the Destination City and EC BID as well as with the Leadenhall Market businesses.
483. A Cultural Implementation Strategy would be secured in the S106 agreement to secure a year-round Cultural Programme which would establish monitorable deliverables in curation of the spaces for education outreach, sharing of knowledge, cultural activities and events which would respond to the needs of the local area and be informed by a continuing dialogue with stakeholders, the local community and building users.
484. The policies referred to above are complied with.

Highways

Public Transport

485. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B. Bank Underground is located approximately 450m east of the site, while Monument Underground Station is approximately 320m southwest of the site. Both of these stations are served by the Northern, Central, Circle, District, Hammersmith & City, Waterloo & City and the Docklands Light Rail services, providing connection to destinations across all London. Liverpool Street National Rail and Underground Station is approximately 800m north of the site on Bishopsgate, providing rail connections to East Anglia as well as London Underground, Overground, Central, Circle, Metropolitan, Hammersmith & City Lines and The Elizabeth Line rail services across London.

Trip generation

486. Within the Transport Assessment a trip generation forecast has been conducted for the site which identifies the net change in trips that would result from the proposed development. The assessment has used TRICS travel data from similar developments within London with a PTAL rating of 6B which are considered suitable comparator sites. The assessment assumes that all existing trips for the retail uses are linked trips or pass by trips associated with an existing journey rather than trips in their own right which is considered an appropriate assumption. For the proposed development an assumption that 30 per cent of the trips associated with the retail floorspace would be trips generated in their own right and given the nature of the proposed retail function this is considered appropriate. An assessment of the trips for with the proposed Heritage Garden has also been undertaken which is based upon a maximum capacity of 207 people. This identifies a peak level of activity of 180 two-way trips during 21:00-22:00 period.
487. The Assessment identifies that the proposed development as a whole would generate 1385 two-way trips during the AM peak (8:00-9:00) and 1,477 trips during the PM peak (17:00-18:00). This is an overall increase of 1155 and 1282 trips respectively which is considered to be significant. Given the accessibility of the site in relation to local public transport services and when considering the projected mode share of trips, subject to appropriate mitigation and improvements to local footway conditions, it is considered that this additional level of activity could be absorbed by the existing Transport network.

Pedestrian comfort Levels (PCLs)

488. A pedestrian comfort level (PCL) assessment has been undertaken to understand the impacts of the development on pedestrian movement through the area. The assessment estimates that the Pedestrian Level of Comfort (PCL) on Gracechurch Street would fall to a level of C following occupation of the development if no footway improvements are made. TFL guidance on PCLs considers levels of C+ acceptable for office and retail locations however the City's recommended minimum level for all areas is B+.
489. To accommodate the forecast pedestrian demand and improve the future PCLs on Gracechurch Street, it is proposed to undertake footway widening works that would be secured under a S278 with TFL as the relevant Highway Authority. The applicant has tabled a design option which includes footway widening along the site frontage extending to a point c.40m south of the site in order to tie in with existing footway widening measures already in place.
490. The PCL assessment concludes this additional space would improve the future PCL scenario at most points along this stretch of footway from a C to B+. The exception is a single area to the south of the site where an

inset loading bay is proposed to be included to accommodate existing loading requirements for other sites along Gracechurch Street and where the future PCL rating would be a C. TfL are the relevant Highway Authority for Gracechurch Street and have advised that the proposals are considered acceptable in principle subject to minor alterations to the design. The applicant will be required to work with TFL during the detailed design stages in order to explore options for limiting the impact of the proposed loading bay on pedestrian movement during peak times.

491. Following the proposed introduction of a new east-west pedestrian link through the site from Gracechurch Street to Lime Street Passage it is considered the pedestrian experience in the area would be considerably improved with greater permeability provided within the local pedestrian network. It is considered that the proposals to open up this area would serve to alleviate some of the pressures on Gracechurch Street and Lime Street Passage.

Cycle parking

492. 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.

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

London Plan long stay cycle parking requirements	Proposed long stay cycle parking	London Plan short stay cycle parking requirements	Proposed short stay cycle parking
505	505	94	114

494. The long stay cycle parking for all uses is proposed at basement level 3 with access available via two cycle lifts from within the site which would be accessible from both Lime Street Passage or Gracechurch Street. The lifts provided would be sufficient in size to accommodate more than one bike without the need for them to be lifted up and down when accessing/egressing and would be positioned such that any queues during the peak hours would occur away from the public highway. The proposals include 428 two tier stands, 26 accessible stands as well as 51 folding bike lockers. This mix of spaces is welcome and would ensure the storage is attractive and easy to use for all potential users of this

facility. To ensure the cycle parking provided is of the highest quality full details of the final cycle storage layout should be secured by condition.

495. Due to the constraints at the ground floor level of the site, the proposals include an innovative short-stay arrangement using an automated mechanical stacking system capable of providing 94 spaces. This would have a public interface at ground floor level where bikes would be automatically moved to a storage/retrieval facility located within basement level 1. This arrangement is considered acceptable in principle and would be available for both users of the site and for those of nearby sites, including Leadenhall Market. Subject to further details secured by condition outlining specific details of the proposed arrangement including, manufacturers details and standards as well as management arrangements, this is considered acceptable. In addition, five ground base Sheffield stands (10 spaces) will be provided within the site at ground floor level.
496. 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 need to be submitted to the City for approval in line with the London Plan Policy T4.

Servicing and deliveries

497. Policy DM16.5 of the Local Plan states developments should be designed to allow for on-site servicing. London Plan Policy T7 G and draft City Plan 2036 Policy VT2 – 1 requires development proposals to provide adequate space off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.
498. As existing all servicing for the site takes place on-street from the Gracechurch Street carriageway in accordance with existing loading restrictions. The proposals seek to provide a new on-site servicing area at basement level one which would be accessed via two lifts set within the new pedestrian walkway which would be suitable for accommodating vehicles up to 8m in length. Vehicles would be able to turn within the basement in order to access and egress from the site in a forwards gear, in accordance with DM16.5.
499. A new vehicular access point would be required on Gracechurch Street to accommodate vehicular access. TFL have not objected to this proposals but have requested that a stage 1 vehicle safety audit be undertaken and this would need to be agreed within TFL as part of the wider S278 agreement to improve the Gracechurch Street footway.

500. The applicant proposes the use of an off-site consolidation centre for deliveries and, when applying a 50% reduction to account for this, it is estimated that there will be an average daily servicing requirement of 29 delivery vehicles. This is considered to be low when assessed against the Council's ready reckoner planning tool which indicates that for the level of floorspace proposed there would be a requirement for 45 vehicles when applying the same 50% reduction to account for consolidation. It is however acknowledged that for Office floorspace consolidation can achieve significantly greater reduction than 50% and subject to a cap on deliveries this is considered acceptable.
501. 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 undertake overnight delivery and servicing activity from 23:00 - 07:00 on Tuesday, Wednesday, Thursday, Friday and Saturday evenings, and between 21:00 – 07:00 on Sunday and Monday evenings in order to allow the new pedestrian route to function safely and unimpeded at all other times. Cargo bikes would be permitted to access the proposed internal off-street servicing area during these times.
502. The development will be required to produce a delivery and servicing plan (DSP), and this would be secured by Section 106 obligation.
503. Overall, it is not considered that the proposed servicing arrangement would result in any undue implication on the public highway, nor highway safety in general and are considered acceptable.

Refuse management

504. A single waste store is proposed at basement level which all building occupants will have access to and be required to use. Tenants or the facilities management Team will be responsible for transporting waste to the service yard immediately prior to collection.
505. As existing, all refuse collections take place on-street and the proposals would facilitate waste collection to take place off-street within the basement level servicing area. The City's Waste Officer has raised concerns over the size of lifts to accommodate standard sized refuse vehicles and highlighted the need for smaller refuse vehicles to be used which provide sufficient clearance for vehicles when using the lifts. The applicant has prepared a Transport Addendum which identifies refuse companies who currently operate refuse vehicles within their fleets with a length of 7.5m or less and Officers are satisfied that the proposals represent a realistic option to allow refuse collections to take place off-street.

506. In the unlikely event smaller refuse collection vehicles are not available within any fleets at a future date, it has been demonstrated that a contingency on-street collection strategy would be possible which uses standard sized vehicles without resulting in any undue impacts upon local highways conditions.
507. Overall, the proposed refuse collection strategy is considered acceptable and full details will be secured within the Delivery and Servicing plan under the S106.

Car parking

508. 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.
509. Local Plan Policy DM16.5 (2) states that designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements.
510. London Plan (2021) T6.5 (non residential disabled persons parking) sets out that a disabled persons parking should be provided in accordance with the levels set out in Table 10.6, ensuring that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay. Standards for non-residential disabled persons parking are based on a percentage of the total number of parking bays. All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no gene
511. The site currently has no off-street parking provision and as such provision of Blue Badge spaces falls to though dedicated parking spaces being created. Whilst basement servicing is provided, this is accessed by way of the pedestrian area within restricted hours (as above) and as such the application does not provide any new opportunities for disabled person's parking that could be accessed throughout the day without conflict to other pedestrian uses and as such the lack of provision is, considered appropriate. There will, however, be at least 3 on-street disabled bays in the vicinity of the site for use by disabled users, as noted by TfL who do not object to the provision. Given the constraints of the site and the context of the surrounding streets, the lack of provision for a blue badge bay is considered acceptable.

Oversailing

512. The proposal includes an area of oversailing on the Gracechurch Street frontage of the site at level 12 and which would be set at a minimum height clearance of 50m. TFL are the relevant Highway Authority for Gracechurch Street and have raised no objection to the proposed over

sail. The applicant will be required to apply to TFL for a licence under S177 of the Highways Act 1980 and technical approval following any grant of planning permission.

Public Realm and S278 Agreement

513. The applicant would need to enter into a S278 Highways Act 1980 agreement with TFL to deliver the following works:
- Relaying of and widening of footway along Gracechurch Street
 - New vehicular crossover on Gracechurch Street frontage
 - New inset loading bay on Gracechurch Street
 - Changes to Traffic Management Orders

Construction Logistics Plan

514. 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. TFL should be fully consulted on the proposals given loading is proposed to take place on their network.

Transportation Conclusion

515. Subject to the conditions and planning obligations set out above, the proposal would accord with transportation policies including London Plan policies T5 cycle parking, T6 car parking. It accords with the Local Plan 2015 Policy DM3.2, and the draft City Plan 2036 Policies AT1, AT2, AT3, and VT3. There is a degree of conflict with Local Plan Policy DM 16.5 in terms of the lack of provision of a blue badge parking bay as set out in the London Plan, however for the reasons set out above this is considered acceptable in this instance. As such, the proposals are considered acceptable in transport terms.

Environmental Impact of Proposals on Surrounding Area

516. 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 10.7 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 development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

Wind Microclimate

517. Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. Computational Fluid Dynamics (CFD) simulation and analysis has also been carried out in accordance with the City of London's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.
518. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being 5 Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.
519. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
520. 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.
521. Assessments have been carried out for both the windiest season and the summer seasons and this is covered in Chapter 11 of the Environmental Impact Statement Volume 1.
522. The wind tunnel and CFD results broadly give the same assessment results. Where there is variance this would only be by one category and in either category the condition would remain suitable to use. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

Wind conditions at street level

523. In the existing baseline conditions the wind tunnel tests and CFD show that conditions around the site are suitable for their intended use, primarily occasional sitting or standing. The majority of the spill-out seating amenity spaces along Leadenhall Market and Lime Street Passage have wind conditions suitable for frequent sitting use during the

summer season. These conditions are suitable for the intended use. Occasional sitting conditions on Lime Street Passage and the seating provisions along the passage to the west of Lloyd's of London are one category windier than suitable for spill-out seating use. Leadenhall Market and Lime Street Passage have been assessed with the inclusion of existing non-porous screens to simulate demarked spill out seating locations, replicating the existing condition where licencing requirements dictate the use of such screens. These screens do serve to improve the baseline condition – when winds do blow through those spaces, they would be providing localised shelter to those areas where they are present.

524. Early testing of the effects of the development on wind microclimate have been extensively assessed through numerous iterations of CFD testing and Wind Tunnel testing during the pre-design freeze stage, to provide a greater understanding of the aerodynamics of the Proposed Development and guide the post-design freeze testing. The pre-design freeze tests were beneficial to design a scheme which is performing well aerodynamically compared to the schemes surrounding the Proposed Development.
525. In considering the completed development, in most locations the wind conditions would remain either in the same categories as existing or become windier by one category but would continue to fall within a category suitable for the intended use.
526. With the proposed mitigation measures and proposed landscaping in place, all locations at street level would experience wind conditions appropriate to the intended use and there would not be any safety exceedances resulting in unsafe conditions.
527. In testing the proposed development and cumulative schemes within 400m of the site, with proposed mitigation measures in place, there would be no material change in wind conditions from the scenario of the proposed development with existing buildings.
528. In conclusion, with the proposed wind mitigation measures in place, where wind conditions become windier at ground level, they remain suitable for the intended uses in the proposed and cumulative scenarios, and there are no unacceptable wind impacts at street level, and so no additional mitigation above that proposed is required.
529. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the Wind Tunnel Test against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the ES.

530. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with Local Plan Policy 7.6, London Plan Policy D8, Local Plan Policy DM10.1, and draft City Plan policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

Daylight, Sunlight, Overshadowing

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

532. Local Plan Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.

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

534. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the Draft City Plan states when considering on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.

535. The BRE guidelines "Site layout planning for daylight and sunlight - A guide to good practice" (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light:

- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important. The BRE Guide states that diffuse daylighting of an

existing building may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.

- **Sunlight:** Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchens and bedrooms to be less important, but that care should be taken to not block too much sun from these rooms.

Interpreting results

536. In undertaking assessments, a judgement can be made as to the level of impact on affected windows and rooms. Where there is proportionately a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which would or would not be acceptable.

Overshadowing

537. Overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG). The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces.

Assessment

538. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the Building Research Establishment (BRE) Guidelines and considered having regard to policy D6 of the London Plan, policy DM 10.7 of the Local Plan and policy DE8 of the draft City Plan. Policy D6D of the London Plan 2021 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing and maximising the usability of outdoor amenity space. The BRE guidelines can be used to assess whether daylight or sunlight levels may be adversely affected. Local Plan policy DM10.7 states that development which would reduce noticeably the daylight and sunlight to nearby dwellings and open spaces to unacceptable levels taking account of BRE guidelines, should be resisted. The draft City Plan 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 its context.

539. The residential buildings to be considered are those at:
- a. 74 Cornhill
 - b. East House
 - c. Flat C, 2-4 Bulls Head Passage
 - d. Jamaica Buildings; and
 - e. 4 Brabant Court
540. The religious receptors to be considered are those at:
- f. St Peter upon Cornhill
 - g. St Edmund's Church – 59 Lombard Street; and
 - h. Church of St Michael Cornhill
541. The commercial receptors to be considered are those at:
- i. Merchant Taylor's Hall
542. When referring to the degree of adverse impact (negligible, minor, moderate etc.) in this report, Officers have adopted the terminology used in the Environmental Statement when describing the degree or extent of adverse impacts. The officers agree with the judgements reached in the environmental statement when arriving at the assessment of the degree or extent of adverse impact. The criteria set out in Building Research Establishment (BRE) Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance to inform the assessment in the environmental statement In forming a judgement on whether the design of the proposed development provides for sufficient daylight and sunlight to surrounding housing and is appropriate for its context (London Plan policy D6D), and when considering whether the daylight and sunlight available to nearby dwellings is reduced noticeably to unacceptable levels (Local Plan policy DM 10.7) and in considering whether daylight and sunlight is appropriate for its context and provides acceptable living standards (draft City Plan policy DE8) it is appropriate to have regard to the assessment carried out in accordance with the BRE guidelines.
543. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and for non-domestic buildings where there is a particular requirement for sunlight. In this case officers do not consider that the offices surrounding the application site fall into the category contemplated by the BRE where

occupiers have a reasonable expectation of daylight, and officers do not consider that the surrounding offices have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same policy test requirements as residential premises. The dense urban environment of the City, in particular in and around the cluster is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises, the proposed development provides a degree of separation such that it would not have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10.

Daylight

544. Daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL), these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assesses the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC or the NSL guidelines are not met.
545. The BRE criteria state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).
546. Both the London Plan 2021 and the draft City Plan 2036 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.
547. Of the buildings assessed, 74 Cornhill, East House, St Edmunds Church, Jamaica Buildings, Merchant Taylor's Hall and 4 Brabant Court were assessed as experiencing a negligible effect within the BRE Guidelines. The impact on the remaining three buildings is outlined below.

St Peter Upon Cornhill

548. This place of worship is located to the north-west of the site, on the western side of Gracechurch Street.
549. A total of 27 windows were assessed for daylight. For VSC, 10 would meet BRE guidelines and 17 would see losses greater than recommended in BRE Guidelines and would experience a reduction of 20% or more.
550. For NSL, results show that all ten of the rooms assessed satisfy the BRE Guidelines.
551. Overall, it is considered that the effect of the proposed development on the daylight availability would be Moderate Adverse (Significant).

Flat C, 2-4 Bulls Head Passage

552. A total of 3 windows serving 1 room were assessed for daylight. For VSC, 1 would meet BRE criteria and 2 would see losses greater than recommended in BRE Guidelines and would experience a reduction of 20% or more. All 3 windows serve the same room and windows that fall short of the guidelines achieve low VSC levels in the existing condition are sensitive to further change.
553. For NSL, results show that the single room assessed satisfies the BRE Guidelines.
554. Overall, it is considered that the effect of the proposed development on the daylight availability would be Minor Adverse (not significant).

Church of St Michael Cornhill

555. This place of worship building is located to the north-west of the site, on the western side of Gracechurch Street.
556. A total of 85 windows were assessed for daylight. For VSC, 74 would meet BRE guidelines and 11 would see losses greater than recommended by BRE Guidelines and would experience a reduction of 20% or more. Of the 11, 9 would be considered minor adverse and 2 would be considered moderate adverse.
557. For NSL, results show that all four of the rooms assessed satisfy the BRE Guidelines.
558. Overall, it is considered that the effect of the proposed development on the daylight availability would be Minor Adverse (not significant).

Sunlight

559. The sunlight assessment shows two properties assessed would experience a change in Annual Probable Sunlight Hours (ASPH) and one property assessed would experience a change in Winter Probable Sunlight Hours (Winter PSH). The impacts on these properties are outlined below.

St Peter upon Cornhill

560. A total of 5 rooms were assessed for sunlight within this building, of which 3 would meet the BRE Criteria for ASPH and Winter PSH.

561. On a window basis, 15 (56%) of the 27 windows tested for ASPH would satisfy the BRE guidelines on an annual basis and 20 (74%) would satisfy the BRE guidelines on a winter basis

562. The two rooms which fall short of the guideline values on an annual basis, one would achieve a factor of former values of between 0.69 and 0.60 and the remaining room would achieve a factor of former value of below 0.60. On a winter basis, the two rooms which fall short of the guideline values would achieve a factor of former value of below 0.60.

563. The overall effect to sunlight at this property is considered Moderate Adverse (Significant).

Jamaica Buildings

564. A total of 5 rooms were assessed for sunlight within this building, of which 3 would meet the BRE Criteria for ASPH and all 5 would meet the BRE Criteria for Winter PSH.

565. On a window basis, 17 (77%) of the 22 windows tested for ASPH would satisfy the BRE guidelines on an annual basis and 22 (100%) would satisfy the BRE guidelines on a winter basis.

566. Considering the three rooms which fall short of the guideline values on an annual basis, two would achieve a factor of their former values ranging between 0.79 and 0.70 and one would achieve a factor of former value of between 0.69 and 0.60. It is worth noting that these rooms are a living room and two bedrooms. The BRE Guidelines state that bedrooms are less important than main living rooms when it comes to sunlight availability.

567. The overall effect to sunlight at this property is considered Minor Adverse (not significant).

Cumulative Impact

568. For daylight, St Peter upon Cornhill, and 4 Brabant Court would experience Moderate Adverse (Significant) effects and Flat C, 2-4 Bull's Head Passage would experience Moderate to Major Adverse (Significant) effects. East House would experience Major Adverse (Significant) effects.
569. For sunlight, The Jamaica Buildings would experience Moderate Adverse (Significant) effects and St Peter upon Cornhill would experience Major Adverse (Significant) effects.
570. Overall the daylight and sunlight available will be sufficient and appropriate to context and would not be reduced to unacceptable levels, and acceptable living standards would be maintained. As such, the overall impact (including the degree and extent of harm) is not considered to be such that it would conflict with, London Plan policy D6, Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.

Sunlight to Amenity Spaces

571. The potential impacts of the Proposed Development on the sunlight availability on surrounding amenity areas has been assessed against the Baseline Scenario.
572. The impacts of the proposed development has been assessed on 22 surrounding amenity areas, including:
- Flat C, 2-4 Bulls Head Passage;
 - All Hallows Staining Churchyard;
 - Aldgate Square;
 - Jubilee Gardens;
 - St Michael's Cornhill Garden;
 - St Edmond the King Churchyard;
 - George Yard;
 - St Peter upon Cornhill Churchyard;
 - Sun Court;
 - Lime Street Square;
 - Leadenhall Street St Mary Axe;
 - St Helen's Bishopsgate Churchyard;
 - Bevis Marks Synagogue Courtyard;
 - Sir John Cass's Foundation Primary School;
 - St Gabriel's Churchyard;
 - St Clements Churchyard;
 - Leadenhall Market; and
 - 1 Leadenhall Street Public Terrace Level 4.
573. Out of the 22 amenity spaces tested, 21 (96%) would satisfy the BRE guidelines criteria for sunlight availability on 21st March by either

retaining 2 hours of sunlight to at least 50% of their areas or by retaining greater than 0.8 times former value.

574. The sunlight results for Leadenhall Market show that one (50%) of the two amenity spaces assessed would meet the BRE guidelines. The remaining space achieves 0.63 times former value. It is worth noting that the area assessed achieves 2 hours of sunlight to just 0.99% of its areas in the existing condition and this is reduced to 0.62% in the proposed condition, so in reality the difference in terms of what is experienced by the user is negligible. As the sunlight availability is so low in the existing condition the area is therefore sensitive to change. It is also worth noting that the ground level of the market has been assessed as this is the area that can be accessed. The glazed roof of the market has not been included in the model. If the assessment was to be rerun with the glazed roof in the model, it is unlikely that any direct sunlight would reach ground floor level in either the Baseline or Proposed Development scenarios.
575. It is therefore considered that the overall effect of the Proposed Development on the sunlight availability to Leadenhall Market amenity space would be Negligible (not significant).

Transient Overshadowing

576. In assessing transient overshadowing, on 21st March, shadow is cast from the proposed development to the northwest from 08:00GMT. The roof of Leadenhall Market and the Leadenhall Street Public Terrace (Level 4) are partially overshadowed by shadow cast from the Proposed Development from 10:00GMT to 17:00GMT. It should be noted that the shadow passes across the rooftop from west to east and so no part of either space assessed will be in shadow for extended periods throughout the day. It is worth noting that the assessment of the existing building demonstrated that parts of the roof of Leadenhall Market would be overshadowed between 11:00GMT and 16:00GMT. The remaining amenity areas are unaffected by shadow cast from the Proposed Development.
577. In conclusion, the results show that there would be no material overshadowing effects caused by the development to any public amenity area and therefore the proposal complies with, policy D6 of the London Plan, DM10.7 of the Local Plan and DE8 of the emerging City Plan.

Solar Glare

578. 30 locations have been identified in the ES as sensitive to solar glare within 1 km of the site. The potential effect of the impact of solar glare on road users has been assessed at the traffic junctions, pedestrian crossings and railway lines at these locations.

579. The assessment concludes that the development would have no effect or a negligible effect on 25 of the locations.
580. Of the remaining 5 locations there is a minor adverse (not significant) effect. At the remaining 5 locations, based on a combination of criteria including angle of the solar reflection in relation to the road users' line of sight, the ability to deploy a visor in all cases other than the lowest angle reflections, the duration of the solar glare and the existence of alternative traffic signals at junctions enabling the road user to use different options, the effects of solar glare are assessed as being 'minor adverse'. The assessment in the environmental assessment concludes that no additional measures are required to mitigate the impact of solar glare. Officers consider that further consideration should be given to the issue of mitigation should planning permission be granted.
581. If planning permission were to be granted, a S106 obligation would be recommended to require a solar glare assessment to be submitted post completion but prior to occupation which would include details of any mitigation measures (if considered necessary). The development would comply with policy D9 of the London Plan, Local Plan policy DM10.1 and draft City Plan 2036 policy DE8 to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

Thermal Comfort Assessment

582. London Plan Policy D8 and D9 and the emerging City Plan 2036 Policy S8 indicate 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. 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.
583. In accordance with the City of London Thermal Comfort Guidelines an outdoor thermal comfort assessment has been prepared. The technique involves merging the effects of wind, air temperature, humidity and solar radiation 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.

584. The Universal Thermal Climate Index (UTCI) categories have been modified for the City of London developments. The usage categories for thermal comfort is set out below and is used to define the categorization of a given location:

585. Three configurations have been assessed including; the existing site with existing surrounding buildings, proposed development with existing surroundings, proposed development with cumulative surroundings.

Usage Category	% of hours with Acceptable UTCI	Description	Colour
All Season	≥90% in each season	Appropriate for use year-round (e.g. parks).	Green
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).	Purple
Short-term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round.	Cyan
Short-term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.	Orange
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).	Red

Leadenhall Lower Terraces

586. The Existing conditions on the 1 Leadenhall lower terraces are mostly 'Short-Term' on the north side terrace with a small region of 'Short-Term Seasonal' at the east end. The south side terrace is mostly in the 'Seasonal' category, with a region of 'All Seasons' in the more sheltered part of the terrace, and a region of 'Short-Term' on the exposed west corner.

587. With the addition of the proposed development the conditions on the north terrace are unchanged, however the conditions on the south terrace are greatly improved by the sheltering effect of the proposed development. The east side of the terrace shifts from 'Seasonal' to 'All Seasons', and the area of 'Short-Term' on the west side is greatly reduced.

588. The addition of the Cumulative surrounds slightly worsens the condition on the north terrace, with the area of 'Short-Term Seasonal' at the east

end extending towards the centre of the terrace. The south terrace however is further improved, with the east side almost entirely at the 'All Seasons' comfort level.

Leadenhall Market

589. Leadenhall Market improves with the south wing shifting from 'Seasonal' to 'All Seasons', and the region of 'Short-Term' at the north side opening being removed.

Lime Street Passage & Bulls Head Passage

590. Lime Street Passage also shows great improvements in comfort with large areas of 'Seasonal' shifting to 'All Seasons', and Bull's Head Passage sees the area of 'Short-Term Seasonal' at the opening to Gracechurch Street improving to 'Short-Term'. Lime Street is also improved with the areas of 'Short-Term' improving to 'Seasonal' and much of the rest improving to 'All Seasons'

Gracechurch Ground Level

591. With the existing surrounds, the conditions at ground level of the Proposed development are largely in the 'All Seasons' category, with a band of 'Short-Term' contained to the central walkway area. This is therefore considered appropriate for use year-round.

592. The addition of the Cumulative surrounds has no notable effect on the comfort levels

Gracechurch Terrace

593. The conditions on the terrace of the Proposed development are 'Seasonal' on the north side, 'All Seasons' on the east side, and 'Seasonal' on the south side, with a small region of 'Short-Term' on the south-east corner. This is considered suitable for use provided that seating is located to avoid the small area of 'Short-Term' in the winter.

594. The addition of the Cumulative surrounds slightly improves conditions, with the region of 'Short-Term' on the south-east corner improving to 'Seasonal'

Thermal Comfort Conclusion

595. 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.

Light Pollution

596. 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.
597. Potential light pollution impacts arising from the proposed development have been assessed in relation to 9 buildings which have been identified as sensitive to the impacts of light pollution in accordance with Institute of Lighting Practitioners (ILP) Guidance.
598. The assessment shows that pre-curfew (before 11pm), the levels of light pollution would be limited and well within the 25-lux threshold set out within the ILP Guidance for all 9 surrounding buildings assessed.
599. The post-curfew (after 11pm) assessment shows that the levels of light trespass would be below the 5-lux threshold set out within ILP Guidance at each of the sensitive surrounding receptors assessed.
600. All of the neighbouring sensitive receptors are shown to experience levels of light trespass well within the guideline values for both the pre and post curfew assessments
601. A condition has been included which requires a detailed lighting strategy to be submitted for approval prior to the occupation of the building demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity.
602. The development would comply with the Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9 and has been designed as to avoid light spill.

Air quality

603. 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 development to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the

development. The requirements to positively address air quality and be air quality neutral are supported by policy SI of the London Plan.

604. The Environmental Statement includes an assessment of the likely impact of the proposed development on air quality as a result of the demolition, construction and operational phases of the development.
605. During demolition and construction dust emissions would increase and would require control through the implementation of good practice mitigation measures contained in the Construction Environmental Management Plans to be submitted and approved under conditions attached to the planning permission.
606. The BREEAM Pre-assessment demonstrates that the scheme is 'Excellent' in the Pollution category.
607. Overall, the proposed development would have a non-significant effect on air quality, during both the construction and operational phases. The proposed development would be Air Quality Neutral and meets the Air Quality Neutral benchmarks for both building and transport emissions assessment.
608. The City's Air Quality Officer has no objections and recommends conditions in relation to installation of generators, Non- Road Mobile Machinery Register details and a compliance condition in relation to flues terminating at least 1m above the highest roof in the development.
609. Subject to conditions, the proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2036, and policy SI of London Plan which all seek to improve air quality.

Noise and Vibration

610. Local Plan 2015 policy DM15.7, and London Plan policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise does not adversely affect neighbours and that any noise from plant should be at least 10dBa below background noise levels.
611. The Environmental Statement assesses the impact from noise and vibration on the surrounding area, including noise and vibration from 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.
612. In most City redevelopment schemes the main noise and vibration issues occur during demolition and early construction phases. The

Assessment identifies a Major Adverse (significant) impact on two sensitive receptors close to the site, 2-4 Bull's Head Passage, 7 Gracechurch Street and the New Moon Public House during the demolition and construction phases. All other receptors are predicted to result in a Minor Adverse or Negligible effect (not significant).

613. Noise and vibration mitigation, including control over working hours and types of equipment to be used would be included in a Construction Environmental Management Plan to be secured by condition, and freight movements would be controlled through the Construction Logistics Plan, secured by condition. These would need to demonstrate compliance with the City's Code of Practice for Deconstruction and Construction Sites and the Mayor of London's Construction Logistics Plan Guidance.
614. During the operational phase of the development, the Assessment concludes that there would be a negligible impact on noise levels from road traffic compared with the existing.
615. Noise levels from mechanical plant in the completed development would need to comply with the City of London's standard requirements that noise output should be 10dB below background noise levels and would be approved under planning conditions to ensure that there would not be an adverse effect on the surrounding area.
616. All deliveries would take place within dedicated loading areas at basement level and would be therefore have a negligible impact in terms of noise associated with unloading.
617. The submitted EIA indicates that the requirements of these conditions can be satisfactorily met and consequently the proposals would comply with London Plan policy D13, Local Plan policy DM15.7 and draft City Plan 2036 policy HL3.

Health Impact Assessment

618. Policy HL9 of the draft City Plan 2040 requires major developments to submit a Healthy City Plan Checklist to assess potential health impacts resulting from proposed developments.
619. The applicants have submitted an HIA using evidence and assessments of impact within documents submitted with the planning application. The HIA sets out an overall positive impact on health arising from the proposed development and advises on the benefit of adopting strategies that will ensure health impacts are positive, such as a Construction Environmental Management Plan and Cycling Promotion Plan.

620. There are 3 residential units in Bull's Head Passage, which adjoins the development site. The HIA addresses potential disturbance from construction noise for the residential units at Bull's Head Passage and states that the Dust Management Plan and Construction Environmental Management Plan will enable mitigation of disturbance.
621. The HIA has been based on the Healthy Urban Development Unit (HUDU) to develop a comprehensive assessment outlining how the proposed development could impact on health identifying relevant pathways towards health outcomes drawing on the wider determinants of health. The Assessment concludes that the development would have an overall positive impact on health. Positive impacts include:
- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment.
 - Excellent cycle facilities which will encourage and support active transport by building users.
 - Servicing and logistics strategy has been designed to minimise delivery vehicle trips to the Site.
 - The Site is well located with good pedestrian and cycle routes, promoting users to choose active modes of travel coming to and from the Proposed Development.
 - The Proposed Development provides greening across the terraces, to create a relaxing working environment and help with wind discomfort.
 - Provision of high-quality public realm at the ground floor, a new public hall and a new route through the Site improving the physical environment and contributing to social cohesion.
 - A car-free development minimising vehicles travelling to the Site and reducing emissions.
 - Building design considering the context of the Site and maximising benefits including employing systems to reduce energy usage. The Proposed Development targets a BREEAM Outstanding rating.
 - Consideration to sustainability and inclusive design.
622. Potential negative impacts identified would need to be mitigated during the construction and operational phases, for example by:
- Employment of a Dust Management Plan (DMP), preparation and agreement of Construction Environmental Management Plan (CEMP) to mitigate dust emissions and address any adverse amenity impacts arising from demolition and construction; and
 - Potential to widen footway on Gracechurch Street to improve pedestrian comfort and safety – to be agreed through Section 278 agreement following further engagement to TfL.
623. Potential negative impacts identified in the Assessment would be mitigated so far as possible by the requirements of relevant conditions and S106 obligations. The development seeks to improve the health and

addresses health inequalities, the residual impact would be acceptable, and the proposals would comply with London Plan policy GG3 and draft City Plan 2036 policy S1.

Sustainability

Circular Economy

624. 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.
625. The application includes considerations as to whether there is an opportunity to retain and refurbish building or building elements currently on site
626. The existing building was constructed in 1935 and most recently refurbished and extended in 1997. The existing structure is steel framed with hollow pot floors and concrete toppings. The steel columns are cased in masonry, and only structural internal walls are those of the cores. The constraints of the existing building can be summarised as follows:
- layout is characterised by irregularly shaped floorplates that are reliant upon a series of lightwells with overall poor natural light levels across its office spaces
 - ground floor retail units without level access
 - no existing outdoor amenity spaces
 - low floor to ceiling heights (c.2.6m on typical office levels)
 - cluttered roofscape
 - facades of poor condition and energy efficiency
 - outdated building services.
627. A material audit has been undertaken and 3 development options have been appraised based on the methodology requested by be CoL draft Whole Life-Cycle Carbon Optioneering Planning Advice Note. These are:
- Option 1: Minor internal refit**
This is not considered to be a viable development option, but it would provide baseline data. 6% of the existing material mass is removed.
- Option 2: Heavy refurbishment including extension to create a mid-rise building**
This option is underpinned by a detailed analysis of the existing building and detailed modelling. It comprises the retention of basement and 7 of the 8 above ground floors, columns, and core structure, upgraded facades except for replacement glazing, remove and replace

all mechanical systems and lifts, adding of 6 additional floors and an additional level of basement for end of trip facilities and for plant space, new foundations and columns to support additional floors. This option would require significant extent of demolition and replacement. 37% of the existing material mass is removed.

Option 3: Redevelopment to create a tall building

This option represents the application scheme and comprises full demolition to include the dismantling of the existing Gracechurch Street façade to be rebuilt with existing stone elements and cast iron spandrel panels, and adapted, to include public and amenity areas. 94% of the existing material mass is removed.

628. With regard to the circularity principles of reducing resources and waste, the majority of the existing fabric (by mass) can be retained in Option 2, however, this option would lack the longevity and flexibility of Option 3 and would not be able to deliver on additional opportunities of this development to supplement Leadenhall Market with a high quality, flexible, public space and to integrate a Museum of London facility linked to the location and the market as major visitor destination, in addition to creating high quality office space with urban greening and biodiversity improvements. Combined with the evaluation of assessing carbon emissions of the options (further detailed in the whole life-cycle carbon emissions section), the applicants consider Option 3 the preferred approach for the site.
629. A pre-demolition audit has been undertaken and submitted that includes the following details to support reuse and recycling of existing materials:
- Detailed quantification of materials, split by building element
 - Targeting 35% of the existing building materials being reused, primarily through secondary materials markets, supporting growing demand for such items in the UK construction sector
 - 61% of existing materials recycled or recovered (i.e., diverted from landfill)
 - Therefore 96% of existing materials will be reused or recycled
 - Only where the above routes are exhausted will materials be sent to landfill
 - Clearly identified links and contacts for reuse marketplaces that can be taken up by any demolition contractor
 - Condition and recovery potential of key materials and products clearly identified and set out for future consideration and to support decision-making.
630. The submitted Circular Economy Statement for the planning application scheme describes the strategic approach to incorporating circularity principles and actions into the proposed new development, in accordance with the GLA Circular Economy Guidance.

631. The new development is designed for a long lifespan and would include a range of circularity principles including:
- reducing water consumption and use of virgin materials, wherever possible;
 - maximising the use of reused, upcycled or recycled materials;
 - specifying recycled content and reused materials, and upcycling materials and working with the supply chain for improved efficiencies;
 - setting out a Sustainable Procurement Plan and challenging supply chain to source and deliver lower carbon materials to the site;
 - aiming for a 95% diversion of construction and demolition waste from landfill (non-hazardous);
 - rationalising the grid structure to promote pre-fabrication and modularization;
 - designing for ease of disassembly from concept design;
 - developing a site waste management strategy during building's In-Use phase;
 - achieving 65% recycling rate for municipal waste, and allocating storage spaces for collection of waste; and
 - implementing a waste collection strategy for the development to maximise recycling.
632. An update to the detailed Circular Economy Statement including results from the detailed design phase and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm that high aspirations can be achieved would be secured by the imposition of the recommended conditions.

Operational energy strategy and carbon emissions

633. The Energy Statement accompanying the planning application demonstrates that the development has been designed to achieve an overall 17% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building. This is equivalent to a 42% reduction when based on Part L 2013 which demonstrates that the building is designed to achieve an ambitious operational carbon emissions reduction comparable to the level of other City office developments approved before Part L 2021 was adopted.
634. The proposed energy demand reduction strategy includes the following:
- façade optimisation for solar gain protection and insulation
 - low water consumption of appliances
 - optimising the heating, ventilation and air conditioning systems including ventilation heat recovery
 - low energy lighting via LED light fittings and addressable lighting control system.

635. In addition to regulated energy use referred to above, unregulated energy use will be addressed through promoting a low energy culture, low energy appliances and high efficiency vertical transportation.
636. The risk of overheating is reduced by incorporating the following measures:
- Optimised glazing ratio to significantly reduce solar gains and achieve adequate daylighting
 - External shading elements dimensioned to reduce solar heat gains to the building perimeter, and in particular the office accommodation
 - Consideration of surrounding buildings to cast shadows on the lower levels.
637. In addition, high performing cooling systems are integrated that would work with openable window panels to allow for mixed mode ventilation which would reduce reliance on mechanical cooling. The ventilation panels would provide health and wellbeing opportunities for the occupants. During favourable external conditions, occupants would be able to operate the panels and benefit from natural ventilation. This strategy would result in a 44% reduction in cooling demands compared to the notional building.
638. The strategy would cumulatively reduce the building's operational carbon emissions by 9% compared to a Building Regulations 2021 compliant building. This would not meet the GLA's target of 15% of carbon emission savings from energy efficiency measures for non-residential buildings for reasons relating to the updated Part L 2021 targets set out above.
639. 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. In addition, the applicants have agreed to assess additional synergies with the adjacent Leadenhall Market that could result in greater energy efficiencies by carrying out:
- a Leadenhall Market District Heat Network Study to supply heat through a connection room in the basement of the application site and
 - a Leadenhall Market Plant Rationalisation Study that could result in providing an enclosure for market plant equipment on the application site which could contribute to enhancing the visual and heritage value of the market by relocating plant from the highly visible roofscape of the market.
640. In relation to low and renewable energy technologies, a system of air source heat pumps located in at roof level would provide space and

domestic water heating. The energy strategy incorporates an area for 63 photovoltaic panels on the roof that contribute to the reduction in carbon emissions through low and renewable energy technologies by 8% carbon emissions savings compared to a Building Regulations compliant building.

Energy Use Intensity (EUI)

641. The adopted GLA energy assessment guidance (2022) requires developments to calculate the EUI, a measure of total energy consumed in a building annually including both regulated and unregulated energy, as well as the space heating demand. For offices, the GLA targets an ambitious EUI of 55 kWh/m²/year (UK Green Building Council target for 2035-2050), and a space heating demand of 15 kWh/m²/year. The estimated EUI from the proposed development is 90.46 kWh/m²/year (42kWh/m²/year for landlord energy and 48.5kWh/m²/year for tenant energy) which is within the UKGBC performance band for 2025-2030. The space heating demand is estimated at 6 kWh/m²/year. The current EUI is limited by the glazing to solid ratio which is optimised for comfort and daylighting but exceeds Passivhaus standards, as well as the heating and cooling energy efficiency achievable at this stage. At this stage the tenant energy can only be a broad estimate and therefore remains conservative. The main sources of energy consumption in the building are estimated to be small power (34%), tenant lighting (12%) and servers (11%).
642. The site-wide energy strategy would not meet the London Plan target of 35% carbon emission savings compared to a Part L 2021 compliant scheme, however, the GLA acknowledges in a note released in 2022 that “Initially, non-residential developments may find it more challenging to achieve significant onsite carbon reductions beyond Part L 2021 to meet both the energy efficiency target and the minimum 35% improvement. This is because the new Part L baseline now includes low carbon heating for non-residential developments but not for residential developments.”
643. 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

644. A BREEAM New Construction 2018 (shell & core) pre-assessment has been prepared, targeting an “outstanding” rating with a score of 85.22%,

and aspiring to achieve further credits with an overall score of 89.26%. The pre-assessment demonstrates that the development is on track to achieve a high number of credits in the CoL's priority categories of Energy, Water, Pollution and Materials, as well as the climate resilience credit in the Waste category.

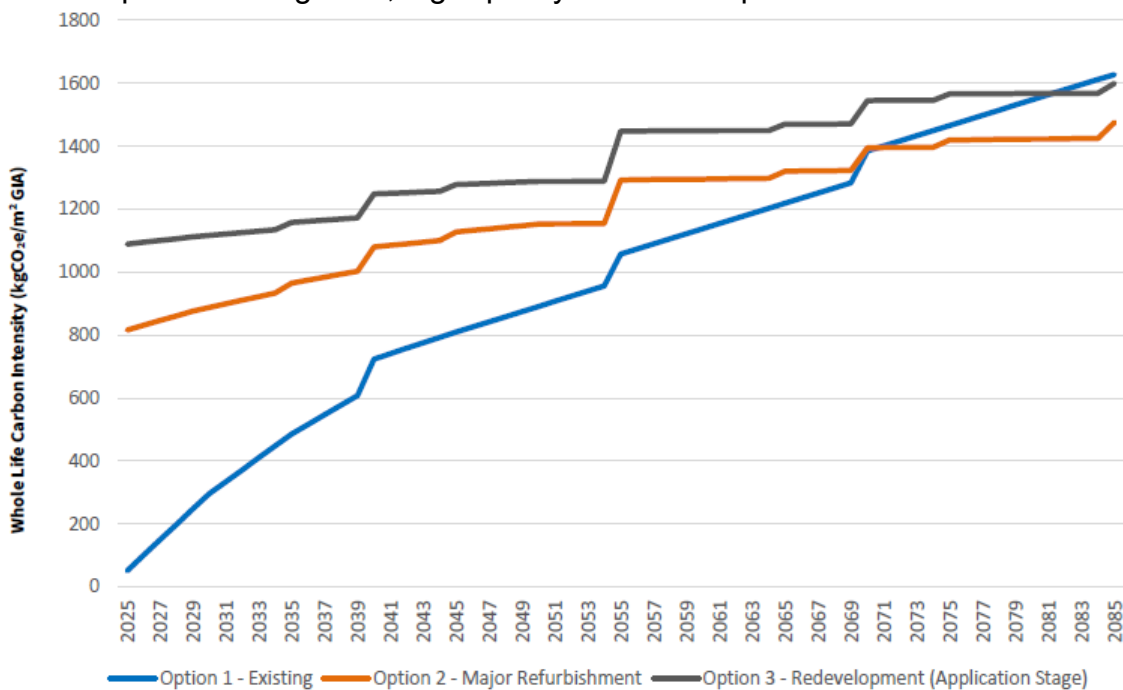
- 645. Further credits are intended to be targeted in the detailed design and fit-out phases of the development, and in particular, further credits can typically be achieved in the Materials, Land Use & Ecology and Pollution categories.
- 646. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2036 Policy DE1. A post construction BREEAM assessment is requested by condition.

Whole Life-Cycle carbon emissions

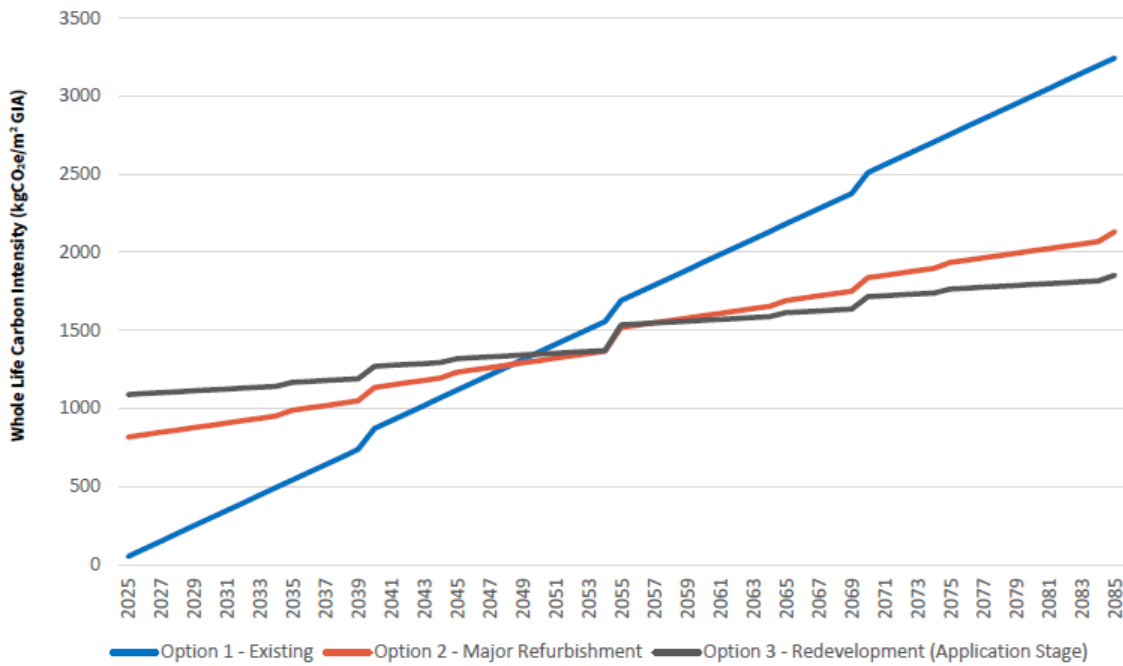
- 647. London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-zero carbon city target.
- 648. With regard to carbon emissions, Option 3 would be able to deliver significant savings through the proposed structural steelwork compared to Option 2, despite the greater size of the Option 3 development. Details of the design and embodied carbon emissions of the proposed tower structure compared to current standards will be requested by condition before construction begins.
- 649. The assessment of the 3 development options for the site as set out in the Circular Economy chapter has been underpinned by a quantitative assessment of whole life-cycle carbon emissions of each option.
- 650. The options are different in their extent of retention and subsequent works to demolish, adapt and alter the existing fabric plus the addition of

new structure, however, the assumptions about the proposed new building elements, building services and finishes/fittings for those works are comparable in options 2 and 3. The applied methodology complies with the CoL Optioneering Planning Advice Note.

651. The resulting whole life-cycle carbon emissions per square meter from the assessed options are set out in the graph below, and include grid carbonisation (National Grid’s Future Energy Scenarios ‘Steady Progression’). Option 1 would have the lowest emissions for a long time span, however, the emissions would rise more steeply due to the poor operational performance of the retained building. The emission levels of Options 2 and 3 would perform in a similar manner over 60 years, with Option 3 being at a higher level due to the larger upfront embodied carbon impact of the proposed building form including basements. However, the upfront carbon impact of Option 2 is also high, due to the need for significant interventions to achieve a refurbishment scheme that provides long-term, high-quality office floorspace.



652. The GLA guidance requires applications to report data without grid decarbonisation applied, until decarbonisation data becomes more reliable. Without grid decarbonisation applied, the whole life-cycle carbon emissions graph below would show that the operational intensity inefficiencies of Option 2, and more so of Option 1, would become a substantial impact much sooner than in the decarbonised scenario, and Option 3, on a square meter basis, would have the lowest carbon emissions in the long term.



653. The table below confirms that the overall total whole life-cycle carbon emissions would be highest for Option 3 (new building), followed by Option 2, while the operational carbon emissions and high energy use intensity of Option 1 would make the use of the retained building rapidly undesirable for occupants due to high energy costs. The operational carbon emissions of Option 2 have been calculated at more than 2.5 times of those of of Option 3, and the energy use intensity for the whole building in Option 2 is almost as high as that of Option 3 despite having less than half of Option 3’s floorspace.

654. In addition to the impacts that are presented in the graphs, the Optioneering study comments on a potential future issue with the refurbishment option that is likely to incur significantly earlier and more comprehensive interventions to maintain long-term performance than the new construction. In contrast, Option 3 is designed to address long term operational carbon reduction and provide longevity and future flexibility.

655. The results of the Optioneering study are presented in the table below:

Item	Option 1 – Existing Building	Option 2 – Major Refurbishment	Option 3 – Redevelopment
Gross Internal Area (GIA)	8,589 m ²	13,777 m ²	37,492 m ²
Increase in NIA	n/a	+4,050 m ²	+16,679 m ²
Embodied Carbon (A1-A5)	46 kgCO ₂ e/m ² GIA	810 kgCO ₂ e/m ² GIA	1,085 kgCO ₂ e/m ² GIA
% Material retained rel. to existing	94% 3,733 tonnes of material retained	63% 2,512 tonnes of material retained	6% 227 tonnes of material retained
Embodied Carbon (A-C)	418 kgCO ₂ e/m ² GIA	1,236 kgCO ₂ e/m ² GIA	1,524 kgCO ₂ e/m ² GIA
Operational Energy (B6) <i>Inc. grid decarb</i>	1,321 kgCO ₂ e/m ² GIA	240 kgCO ₂ e/m ² GIA	77 kgCO ₂ e/m ² GIA
EPC Rating	D		A
Fuel Source	Electricity (main)	100% Electric	100% Electric
Total WLCA (Intensity) <i>Inc. grid decarb</i>	1,739 kgCO ₂ e/m ² GIA	1,476 kgCO ₂ e/m ² GIA	1,601 kgCO ₂ e/m ² GIA
Total WLCA (tonnes)	14,936 tCO ₂ e A-C	20,335 tCO ₂ e A-C	60,025 tCO ₂ e A-C
Total Energy (60 years)	185,522,400 kWh	90,928,200 kWh	94,458,480 kWh

656. In summary, both Option 2 and 3 would achieve a high level of operational energy performances compared to existing, provide climate resilience and enhance urban greening and occupier amenity. While Option 2 would retain 63 % of fabric and limit whole life-cycle carbon impacts, Option 3 would retain only 6% of fabric and increase whole life-cycle carbon impact in absolute terms compared to Option 2 due to its larger size. However, the structural, façade and building services design of Option 3 has been optimised to reduce upfront carbon impact, particularly with the long term benefits for energy use intensity, flexibility, and the need for maintenance and replacements. Combined with the benefits of significantly increased lettable floorspace in this central location and the opportunities for significant public benefits relating to the future of Leadenhall Market as a heritage asset, and to provide an additional cultural facility in this historic location, the applicants therefore take forward Option 3 to redevelop the site as per the application proposal.

The application proposal:

657. 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 GLA

benchmarks as set out in the table below. The results show that the upfront embodied carbon emissions as well as the total embodied carbon emissions would not meet the GLA's Standard Benchmark at this stage. It is anticipated that further, significant embodied carbon efficiency reductions can be achieved during the detailed design development, such as maximising cement replacement products, the use of EAF (electric arc furnace) steel as well as steel, aluminium and glass with high recycled content. An update to the whole life-cycle carbon assessment detailing further reduction measures has been requested by condition. In addition, details of the design and embodied carbon emissions of the proposed tower structure compared to current standards will be requested by condition before construction begins, in order to further drive down embodied carbon impact of the proposed development.

658. Embodied carbon emissions at planning application stage are shown in the table below:

Scope	Proposed Redevelopment	Benchmark	GLA Benchmark
RICS Components	kgCO2/m2	kgCO2/m2	
A1-A5	1085	<950	GLA Standard
		<600	GLA Aspirational
A-C (excluding B6-B7)	1524	<1400	GLA Standard
		<970	GLA Aspirational
B6-B7	345		
A-C (including B6-B7)	1869		

659. These figures would result in overall whole life-cycle carbon emissions of 70,072,272 kgCO2 being emitted over a 60-year period. Of this figure, the operational carbon emissions (life-cycle stage B6) would account for 12,846,353 kgCO2. 81.5% of the overall impact would be associated with embodied carbon and 18.3% of the overall impact would be associated with operational carbon emissions. The largest contributor to the upfront embodied carbon emissions of the proposal is the superstructure, roof and stairs with 44.2% and 28.8% is associated with the façade). This is exacerbated by the tight site footprint and tall size of the proposal that increases the mass of the structural frame and the proportion of facades relative to the volume of the building. This is

followed by the building services with 9.8% of the upfront embodied carbon emissions. The substructure would be responsible for 7.7% of the embodied carbon emissions. The high frequency of replacement of the façade components would be reduced by a design that enables the replacement of parts at different frequencies. Further carbon efficiencies are anticipated during the detailed façade design development.

660. Over the proposed building's whole life-cycle, the embodied carbon emissions calculations at planning stage for the proposed building are slightly higher compared to the Greater London Authority's Standard Benchmark emissions target. This particularly is to be expected with regard to the upfront carbon emissions of a tower structure while the carbon emissions associated with operational energy use would be low. 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 low carbon materials and structural optimisation. A detailed whole life-cycle carbon assessment incorporating improvements that can be achieved through the detailed design stage, and a confirmation of the post-construction results have been requested by conditions.

Urban Greening

661. The proposed development would incorporate a variety of urban greening measures, which provides the following benefits: mitigating air and noise pollution, capturing CO₂ while releasing O₂, combating the heat island effect, improving biodiversity, rainwater run-off management as well as making a place healthier and more attractive, improving the wellbeing of people.
662. Across the entire application site, the development achieves an Urban Greening Factor (UGF) 0.92 which substantially exceeds the London Plan Policy G5(B) UGF target of 0.3. When taking only the actual site ownership area into consideration, excluding public highway on Gracechurch Street, the UGF score is 0.94 using the GLA calculation methodology and 1.07 using the City of London calculation methodology.
663. The substantial increase in greening is integrated into the architectural approach on the building, which priorities planting that is maintainable and will thrive and survive, with generous planters proposed up the tower of the building and a rich woodland terrace at Level 5.
664. The siting, size and planting palette would ensure year-round seasonal diversity and richness whilst optimising the holistic benefits of greater biodiversity, cooling, noise attenuation, SuDs and general amenity, with well documented health and wellbeing benefits. The details would be

secured by condition and would include maintenance and irrigation details.

Overheating

665. It is positive that the proposed development has considered an optimised glazing ratio, and makes use of Portland stone and restricted glazing on the southern façade, including insulated panelling, to minimise solar gain during summer months. There is a degree of passive solar shading via recesses/overhangs in the façade.
666. Ventilation is primarily provided via mechanical means through heat recovery units, although office areas will include openable window panels to allow for mixed mode ventilation; this reduces reliance on mechanical cooling. The use of green infrastructure at vertical locations will also contribute to resilience against overheating to some degree, provided this is well-chosen and remains maintained.
667. Thermal modelling demonstrates that thermal comfort can be achieved accordance with the criteria set out in CIBSE guidance.
668. Inclusion of drinking water features in the public realm between Gracechurch Street and Lime Street Passage are welcomed.

Flooding

669. The proposed development is predicted to be of low risk of flooding from all sources, including surface water flooding.
670. A blue/green roof system is proposed in order to attenuate stormwater.
671. The proposed development has a strong focus on inclusion of urban greening, with positive references to planting for resilience, habitat connectivity and biodiversity value.
672. Proposed vertical planting includes evergreen, native species for wind-break purposes, supplemented with non-native planting for biodiversity enhancement. Planting at Level 5 is based on a native woodland approach and contains a number of trees within deep planters, night-scented plants and pollen-rich species.
673. There is reference to areas of food-growing at the Level 5 garden, which is supported by London Plan Policy G8.

Conclusion on Sustainability

674. 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.
675. The proposed development is on track to achieve an “outstanding” BREEAM assessment rating and is committed to work through the detailed design phases to achieve further improvements in operational and embodied carbon emissions through optimised material choices and design. The planning scheme includes passive energy saving measures and low energy technologies to significantly reduce operational carbon emissions and potentially supporting improvements to Leadenhall Market’s energy strategy in the future. The embodied carbon emissions can be reduced to a level close to the GLA’s Standard Benchmark, with opportunities for further improvements identified and to be submitted and agreed by condition. Circular Economy principles can be positively applied to achieve a long term, robust, low carbon, flexible, commercial development. The building design responds well to climate change resilience by reducing solar gain, incorporating natural ventilation, water saving measures and various opportunities for urban greening and biodiversity.

Security

676. The security proposals to protect the building and new areas of public realm have been development in consultation with the Designing out crime and the counter terrorism security officers within the City of London Police at pre-application stage.
677. The site would be protected HVM resistant bollards located at the building entrances at ground floor level. The bollards would be automated at these vehicle entrances to enable vehicles to access the building. These would be on private land within the site.
678. Trained personnel would be present at the ground floor security gates during office hours to prevent pedestrians from using the escalators to access the office lobby at Level 2. An automated security gate would close off the office entrance from ground floor level between 19:00 and 07:00 to prevent pedestrians from using the escalators to access the upper floors. Office users would be able to exit the building through access-controlled security doors onto Gracechurch Street during these hours.

679. Security gates, shutters and HVM bollards would secure both the Gracechurch Street and Lime Street Passage from pedestrians and vehicles during the hours of 23:00 and 07:00.
680. Additional lines of security throughout the building would prevent unauthorised access to various areas of the building including the prevention of occupiers and visitors accessing subsequent floors when using the fire escape cores; and security turnstiles at basement level 3 to prevent cycle users from accessing the building from the lower levels. The public lifts would require an access control card to prevent members of the public from accessing the office spaces at levels 2 to level 4. Further lobbies and security lines would be stationed at the first three office levels to prevent members of the public from accessing these spaces.
681. Further details of the overall security strategy will be required by condition and a Visitor Management Plan will be required by S106 which will detail more specifically the measures to protect the Heritage Garden at level 5.
682. The proposal, subject to conditions and S106 obligations is considered to be in accordance with policy DM3.2 and draft City Plan strategic policy S2 and policies SA1 and SA3.

Fire Statement

683. A Fire Statement has been submitted outlining the fire safety strategy for the building which has been developed in consultation with the City District Surveyor's office and the London Fire Brigade. The statement adequately covers the relevant fire aspects of the design and is in accordance with policies D5 and D12 of the London Plan. The Fire Statement is therefore adequate for the planning stage and is secured by condition

Assessment of Public benefits and the paragraph 202 NPPF balancing exercise

684. 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".
685. Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit.

However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. Paragraph 193 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. As the statutory duty imposed by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged, considerable importance and weight must be given to the desirability of preserving the setting of listed buildings, when carrying out the paragraph 202 NPPF balancing exercise in relation to less than substantial harm to the significance of listed buildings.

686. In this case, the less than substantial harm ranges from slight to low in relation to:

- St Michael Cornhill Church (Grade I): a low level of less than substantial harm;
- Bank Conservation Area: a slight level of less than substantial harm;
- Tower Bridge (Grade I): a slight level of less than substantial harm.

687. Paragraph 202 requires this harm be weighed against the wider public benefits of the proposal including, where appropriate, securing optimum viable use.

688. The key social, environmental and economic public benefits of the proposal are considered to be:

- Economic: the proposal would assist in facilitating improvements to the number and wellbeing of users, translating to economic benefits. It would focus on the impact of public realm improvements, increasing property values as well as attracting investment to the area, attracting visitors, increasing tourism, improving worker productivity and enhancing the image of the area. The proposals would assist in delivering growth in an accessible area and overall, this benefit is attributed a moderate to high level of weight.
- Environmental: the proposal would assist in consolidating the City Cluster of tall buildings resulting in some minor to modest enhancements of strategic and local neighbouring boroughs views which are important to the character and identity of London. It would deliver growth in a highly sustainable location which will assist in the delivery of the CoL's Transport Strategy and Healthy Street, assisting in creating sustainable patterns of transport. At a local level the proposal would result in significant enhancement of the public realm

at ground and higher level, delivering enhanced public space, retail, active frontage and cultural uses which will enhance the vitality, character and distinctiveness of the site and wider City Cluster, including new views and heritage appreciation. This is attributed a moderate level of weight.

- Heritage Benefits: the proposal would result in some modest heritage benefits identified to the Leadenhall Market Conservation Area. These are attributed great and considerable weight in accordance with para 199 of the NPPF and s.72 of the Planning (Conservation Area and Listed Buildings) Act 1990. Commensurate with the lower level of heritage benefit, and the need to be proportionate, this is attributed moderate weight overall.
- Social: the proposal would deliver a new public hall and Heritage Garden which would (i) provide a new place of public assembly which would be complimentary to Leadenhall Market that would act as a catalyst for its rejuvenation (ii) be a significant new architectural experience that would diversify and enrich the City Cluster (iii) be an exemplary interpretation and celebration of the rich history of the site through the employment of Romanesque architectural forms and the reopening of the historic route through the site. The proposed Heritage Garden would offer a significant new exhibition devoted to Londinium's Forum-Basilica on a site uniquely placed for the purpose; it would have another complimentary function in providing a space for archaeological outreach and schooling to support the wider development of this discipline in the City and London; it would offer significant and very fine views over the roofscape of Leadenhall Market and the wider Conservation Area, allowing an appreciation of this historic fifth elevation as well as other landmarks and modern architecture like Lloyds' of London. it is considered
- This is attributed a moderate to high level of weight overall.

689. In terms of the low level less than substantial harm found to St Michael Cornhill and the slight level found to Tower Bridge, given that they are Grade I listed buildings and designated assets of the highest order, particular force has been attributed to the failure to preserve their settings, and the need to give considerable importance and weight to the desirability of preserving their settings. Together with the slight level of harm caused to the significance of the Bank Conservation Area, the overall harm must still be proportionate to the very low to low levels of harm identified. In this instance, when applying the great/considerable weight to these harms, the overall weight attributed to them is moderate to high.

690. When carrying out the Para 202 balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving

the building or its setting. It is considered that the wider public benefits, including heritage benefits described, and attributed weight above would be more than sufficient to outweigh the heritage harm identified, thus complying with paragraph 202 of the NPPF..

Planning Obligations and Community Infrastructure Levy

691. 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.
692. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
693. On the 1st 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).
694. CIL contributions and City of London Planning obligations are set out below.

MCIL2 Calculation

Liability in accordance with the Mayor of London’s policies	Contribution	Forwarded to the Mayor	Retained for administration and monitoring
MCIL2	£5,293,998.49	£5,082,238.55	£211,759.94

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£2,209,275.00	£2,098,811.25	£110,463.75
City Planning Obligations			
Affordable Housing	£1,472,850.00	£1,458,121.50	£14,728.50
Local Training, Skills and Job Brokerage	£883,710.00	£874,872.90	£8,837.10
Carbon Reduction Shortfall (<i>as designed</i>) <i>Not indexed</i>	£299,658.00	£299,658.00	£0.00
Security Measures Contribution (Eastern City Cluster)	£294,570.00	£291,624.30	£2,945.70
S106 Monitoring Charge	£4,750.00	£0.00	£4,750.00
Total liability in accordance with the City of London's policies	£5,164,813.00	£5,023,087.95	£141,725.05

City Planning Obligations

695. 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.

Heads of terms

- Highway Reparation and other Highways Obligations
- Local Procurement Strategy
- Employment and Skills Plan (Demolition / Construction)
- Delivery and Servicing Management Plan (including Consolidation)
- Cycling Promotion Plan
- Carbon Off-Setting
- Cycle Hire Contribution (£ to be confirmed on consultation with TfL)
- Service Vehicle Lift Maintenance and Management Strategy
- Construction Monitoring Costs (£53,820 for First Year of development and £46,460 for subsequent years)

- ‘Be Seen’ Energy Performance Monitoring
- Utility Connection Requirements
- Section 278 Agreement (Transport for London)
- Footway improvements to Lime Street Passage (this is not part of the public highway so would be outside the scope of the s278 works)
- Public Routes (Specification, Public Access & Management Plan)
- Fifth Floor Cultural Space and Terrace (Public Access & Visitor Management Plan) Free to access, to be open all year round (except Christmas Day, Boxing Day, New Year’s Day if required) and during the hours of 10am to 7pm or nautical dusk whichever is the later)
- Public Hall and Events Space (Management Plan)
- Cultural Implementation Strategy
- Television Interference Survey
- Wind Audit
- Solar Glare

696. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations as necessary and enter into the S106 and S278 agreements.

697. The scope of S278 agreement may include, but is not limited to, highway/footway improvements to Gracechurch Street.

Monitoring and Administrative Costs

698. 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.

699. The applicant will pay the City of London’s legal costs and the City Planning Officer’s administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Site Specific Mitigation

700. The City will apply CIL towards infrastructure to support the development of the City.

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

701. The City, as a public authority must, in the exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

702. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. It is the view of officers that a decision to grant permission in this case would remove or minimise disadvantages suffered by persons who suffer from a disability and in particular mobility impairment by providing enhanced and accessible public realm. It is also the view of officers that although an onsite disabled person's parking space is not considered possible in this instance, there will be at least 3 on-street disabled bays in the vicinity of the site and this is considered acceptable, the provision of accessible floorspace and publicly accessible viewing gallery and winter garden would advance equality of opportunity.

Human Rights Act 1998

703. 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")).

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

705. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising through impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

Conclusions and Overall Planning Balance

706. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Local Plan and considering all other material considerations.
707. The Proposed Development comprises the demolition of the existing building on site (Gracechurch Street frontage to be adapted and reinstated), and its replacement with an office-led City tower incorporating a Public Hall at ground level and elevated public terrace incorporating a Heritage Garden and Cultural Space. The replacement proposed delivers a high quality, office-led development in the emerging City Cluster, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses.
708. The proposed striking articulated form with carefully integrated urban greening will enable it to make a significant beneficial contribution to the appearance of the City Cluster. The existing frontage to Gracechurch Street, which has heritage value but has been detrimentally altered over the years, will be adapted and reinstated in the development, in a form that is more representative of its original appearance and future public use.
709. The activation of 85 Gracechurch Street will support the reinvigoration of Leadenhall Market which currently suffers from low footfall and a 20% vacancy rate. An Economic Benefits Statement prepared by Volterra finds that 77% of those pedestrians passing through Leadenhall Market buy nothing in the Market. The development will drive a significant increase in footfall and revenue to Leadenhall Market and retain a higher proportion of those visitors by creating a destination with Leadenhall Market through a wider range of multi-use spaces and activities of a cultural and retail nature. This is estimated to increase the spending in Leadenhall Market by between £5.9m and £19.7m per annum, enabling it to become a destination that is successful with a diverse range of visitors seven days a week in line with the Destination City ambitions of the City of London.
710. Reinstating a historic City public route through the delivery of an activated and democratic public hall, the ground floor is identified for an ultra-flexible programme of commercial and cultural activities, as well as a place for all people to pass through and appreciate, providing and modern and complementary extension to the publicly accessible spaces in Leadenhall Market. The Public Hall and associated ground floor uses are expected to attract between 1.5m – 3m visitors to the Leadenhall Market Principal Shopping Centre per year, with a direct adjacency to

Leadenhall Market to provide a different and highly beneficial complementary publicly accessible use to the benefit of it.

711. Working with the Museum of London as cultural content partner, the development will deliver a highly significant cultural asset to the City of London which will celebrate the Site's history in the origins of London and location in the footprint of the Roman Forum of Londinium. The space will include opportunities for archaeological display and virtual reality experiences, as well as a Heritage Walkway which will provide exceptional views over Leadenhall Market, revealing elements not currently appreciated in public views. It is expected to attract between 50,000 and 300,000 visitors per year.
712. A series of complementary flexible retail spaces at ground, first and fifth floor would provide a suitable selection of retail and food and beverage operators, the variety of spaces would provide opportunities for independent and micro retailers.
713. The floorspace will contribute to meeting the high demand of City businesses for Grade A office floorspace that is of exemplary modern standards of sustainability and wellness. It will contribute to the operational decarbonisation of the City's stock of office floorspace. Overall, the Proposed Development is predicted to accommodate between 1,720 – 2,210 Full Time Equivalent (FTE) jobs, an uplift of between 1,145 – 1,765 FTE jobs. Lower floors are designed to be capable of accommodating SME's and flexible working to complement the larger floor plates to the upper levels.
714. A highly sustainable approach to development that meets or exceeds all Greater London Authority and City of London sustainability policy requirements. This approach is through the lifespan of the scheme: from deconstruction of the existing building, through to construction and during its long-intended operation as a net zero carbon building.
715. The development will deliver considered urban greening, with a focus on ensuring that planting is able to thrive in generously proportioned planters and be properly maintained, so that it maintains its quality throughout the life of the development. The Urban Greening Factor will significantly outperform adopted Greater London Authority and emerging City of London Urban Greening Factors, with a baseline of over 0.8 compared to the 0.3 policy target, and over 1 when measured using the City of London methodology within the site ownership boundary. Relatedly, the Proposed development will deliver an exponential Biodiversity Net Gain (over 2,000%).
716. This will include long stay parking of various types for the use of future office occupiers, as well as 114 short stay cycle parking spaces for the use of any visitors to the site and surrounding area where a current

paucity of spaces exist, an overprovision of 18 versus the London Plan requirements.

717. The scheme benefits from high levels of public transport accessibility, would be car-free and would promote cycling and walking as healthy modes of travel.
718. Objections have been received from statutory consultees and third parties, relating to the design of the development, its impact on designated heritage assets and the impact on the environment and amenity of the immediately surrounding area and buildings. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations.
719. The proposal would deliver a tall building on a site in the Eastern Cluster in accordance with Local Plan Policy CS7, City Plan Policies S12 and S21, and London Plan policy D9. The proposal would not harm and would protect pan-London LVMF and local strategic views in accordance with Local Plan Policy CS13(1), draft City Plan 2036 Policy S13 and London Plan Policy HC4 and associated guidance in the LVMF SPG and Protected Views SPD. It would preserve the experience from those existing and emerging high-level views identified which are also important to the character of the City of London. Following rigorous assessment, it is concluded that the proposal would preserve the OUV/Significance, authenticity and integrity of the Town or London World Heritage Site, according with associated guidance in the WHS Management Plan, Local Setting Study and LVMF SPG.
720. The proposal would preserve the special interest/significance and setting of the listed buildings at the Tower of London, , Leadenhall Market, The Monument, The Ship Tavern PH, 81-82 Gracechurch Street, 7-9 Gracechurch Street, 39-40 Lombard Street, 7-8 Philpot Lane, Custom House, Billingsgate Market, Cannon Street Station Towers, St Mary-le-bow, Former Port of London Authority Building, Adelaide House, 1 Cornhill, Vincula Chapel and St Thomas' Tower. It is considered that the significance of the Tower of London, , Eastcheap and Leadenhall Market Conservation Areas would be unharmed.
721. The proposals comply with the policies relating to strategic views, and the policies which seek to protect the Tower of London WHS.
722. The proposals comply with strategic objective 1 in the Local Plan and with the policies relating to offices and to economic growth.
723. The proposals conflict with policy CS 14 in relation to Tall Buildings which states that planning permission will be refused for tall buildings within inappropriate area, including conservation areas.

724. The environmental impact of the development on the neighbouring buildings and spaces has been assessed. Adverse impacts have been identified on noise and vibration in the surrounding area and to nearby buildings, primarily during the construction phase.
725. The impact on daylight to surrounding properties at St Peter upon Cornhill, and 4 Brabant Court would experience Moderate Adverse (Significant) effects and Flat C, 2-4 Bull's Head Passage would experience Moderate to Major Adverse (Significant) effects. East House would experience Major Adverse (Significant) effects and the impact on sunlight to surrounding properties at the Jamaica Buildings would experience Moderate Adverse (Significant) effects and St Peter upon Cornhill would experience Major Adverse (Significant) effects. Despite failures against the BRE guidelines, it is not considered that the proposal would result in an unacceptable impact on the existing use of the properties in the context of the location of the site in a dense urban area which is in the emerging City Cluster and on an identified Renewal Opportunity Site. As such, the extent of harm is not considered to be such as to cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. In any event, it is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City's primary business and professional services function, outweighs the Minor Adverse impact.
726. Negative impacts during construction would be controlled as far as possible by implementation of a robust Construction Environmental Management Plan and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions and S106 obligations would minimise any adverse impacts.
727. The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to the general planning obligations there would be site specific measures secured in the S106 Agreement. Together these would go some way to mitigate the impact of the proposal.
728. It is the view of officers that as a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 complied with, and as London Plan policy D9, and Local Plan policy DM12.2 are complied with, as are policies relating to strategic views, design, and public realm, that notwithstanding the conflict with CS14(2) and the conflict with local plan policy DM 12.1 and London Plan policy HC1(C) (in relation to the low

level less than substantial harm to two Grade I listed buildings and one conservation area) , the proposals comply with the development plan when considered as a whole.

729. In addition, other material considerations, including the application of policies in the NPPF, in particular the outcome of the paragraph 202 NPPF balancing exercise, and the significant weight to be placed on the need to support economic growth (paragraph 81), also indicate that planning permission should be granted.

730. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

Background Papers

Consultation Responses

Email, GLA, 09.12.2022
Letter, London City Airport, 13.12.2022
Email, London Underground, 13.12.2022
Letter, LB of Hackney, 14.12.2022
Email, Heathrow Airport, 14.12.2022
Memo, Air Quality Officer, 15.12.2022
Letter, Environment Agency, 15.12.2022
Letter, LB of Islington, 19.12.2022
Email, NATS Safeguarding, 19.12.2022
Email, Thames Water, 28.12.2022
Email, Thames Water, 28.12.2022
Letter, Natural England, 04.01.2023
Letter, Natural England, 04.01.2023
Memo, Environmental Resilience Officer, 04.01.2023
Letter, City of Westminster, 05.01.2023
Memo, District Surveyors Office, 09.01.2023
Letter, City of London Conservation Area Advisory Committee, 18.01.2023
Memo, Access Officer, 19.01.2023
Memo, Lead Local Flood Authority, 19.01.2023
Letter, City of London Conservation Area Advisory Committee, 24.01.2023
Letter, The Victorian Society, 26.01.2023
Letter, Historic England, 30.01.2023
Letter, GLA, 30.01.2023
Letter, TFL, 09.02.2023
Memo, Environmental Health Officer, 20.02.2023
Letter, City of Westminster, 22.02.2023
Letter, Historic England, 28.02.2023
Letter, Royal Borough of Greenwich, 01.03.2023

Representations

Letter, Miss E J Baylis, 14.12.2022
Letter, Mann Vergan, 14.12.2022
Letter, William Ryan, 14.12.2022
Email, Peter Rose, 17.12.2022
Letter, The Parochial Church Council of St Peter upon Cornhill, 12.01.2023
Letter, Museum of London, 16.01.2023
Comment, Dr Chris Blatchley, 24.01.2023
Letter, EC Bid, 02.02.2023
Email, Miss E J Baylis, 01.03.2023
Letter, BeauGems, 19.01.2023

Documents

Covering Letter, by DP9, November 2022
Planning Statement, by DP9, December 2022
Design and Access Statement, by Woods Bagot, November 2022

Noise and Vibration Report, by Trium, November 2022

Appendix: Noise and Vibration, by Trium, November 2022

Daylight, Sunlight, Overshadowing, Light Spillage and Solar Glare Report, by Trium, November 2022

Appendix: Daylight, Sunlight, Overshadowing, Light Spillage and Solar Glare, by Trium, November 2022

Air Quality Report, by Trium, November 2022

Appendix: Air Quality, by Trium, November 2022

Archaeology Report, by Trium, November 2022

Appendix: Archaeology, by Trium, November 2022

Climate Change Report, by Trium, November 2022

Appendix: Climate Change, by Trium, November 2022

EIA Methodology, by Trium, November 2022

Appendix: EIA Methodology, by Trium, November 2022

Appendix: Health, by Trium, November 2022

Traffic and Transport Report, by Trium, November 2022

Appendix: Traffic and Transport, by Trium, November 2022

Wind Microclimate Report, by Trium, November 2022

Appendix: Wind Microclimate, by Trium, November 2022

Biodiversity Net Gain Report, by Schofield Lothian, November 2022

Circular Economy Statement, by Sweco, November 2022

Cultural Plan, by Museum of London Archaeology, November 2022

Demolition and Construction Report, by Trium, November 2022

Economic Benefits Statement, by Volterra, November 2022

Effects Interactions Report, by Trium, November 2022

Energy and Sustainability Statement, by Sweco, November 2022

Environmental Management, Mitigation and Monitoring, by Trium, November 2022

Environmental Statement Volume 1, by Trium, November 2022

Environmental Statement Volume 2 (Heritage, Townscape and Visual Impact Assessment), by The Townscape Consultancy, November 2022

Environmental Statement Volume 3 (Technical Appendices), by Trium, November 2022

Environmental Statement Non-Technical Summary, by Trium, November 2022

Fire Statement, by Arup Fire, November 2022

Flood Risk Assessment and Drainage Strategy, by Robert Bird Group, November 2022

Geotechnical & Geo-Environmental Desk Study Report, by Robert Bird Group, November 2022

Landscape and Public Realm Strategy Report, by Spacehub, November 2022

Likely Significant Effects and Conclusions, by Trium, November 2022

Outdoor Thermal Comfort Assessment, by Wirth Research, by Trium, November 2022

Preliminary Ecological Appraisal, by Schofield Lothian, November 2022

Smart Infrastructure and Utility Statement, by Sweco, November 2022

Statement of Community Involvement, by Kanda Consulting, November 2022

The Proposed Development, by Trium, November 2022

Ventilation and Extraction Statement, by Sweco, November 2022

Whole Life Carbon Optioneering Assessment Study, by Sweco, November 2022

Equality Statement, by Trium, January 2023
Fire Statement, by Arup Fire, February 2023
Supplementary Archaeological Information, by MOLA, February 2023
Outline Construction Environmental Management Plan, by Blue Sky Building, November 2022
Healthy Streets Transport Assessment, by Momentum, November 2022
Applicants response to Victorian Society Objection email by Dp9, March 2023
BREEAM 2018 NC Design and Procurement Assessment, by Sweco, April 2022
HTVIA Response to Additional Views Comments, by The Townscape Consultancy, March 2023
Cultural Plan Addendum, by Museum of London Archaeology, March 2023
Design Statement Future Listed Building Consent, by Woods Bagot, March 2023
Cover Letter and Appendices, by Dp9, February 2023
(Appendix A.1: Access Officer Comments Tracker)
(Appendix A.2 Momentum Accessibility Response)
(Appendix B: Response to GLA Stage 1)
(Appendix C: Response to TfL Comments)
(Appendix D CoL Waste Vehicle Access Response)
(Appendix E: HTVIA Response to additional views comments)
(Appendix F: HE Response Letter)
(Appendix G: Supplementary Archaeological Information)
(Appendix G.1: Alternative Basement Concept)
(Appendix H: 2-4 Bulls Head Passage)
(Appendix H.1: Residents Ventilation Solution)
(Appendix H.2: Letter to Residents)
(Appendix H.3a: Interim email to Bulls Head Passage residents)
(Appendix H.3b: Interim letter to Bulls Head Passage residents)
(Appendix I: St Peter Upon Cornhill Letter)
(Appendix J: Response to other representations)
GLA Sustainability Spreadsheet
District Heat Network, Heat Sharing and Plant Rationalisation Opportunities with Leadenhall Market, by Sweco, January 2023
Applicants response to GLA Stage 1, by Dp9, February 2023
Document titled answers to COL, by Woods Bagot, January 2023

Existing Drawing Numbers

P-1200 REV 02, P-1201 REV 02, P-1202 REV 02, P-1203 REV 02, P-1204 REV 02, P-1205 REV 02, P-1206 REV 02, P-1207 REV 02, P-1208 REV 02, P-1209 REV 02, P-1210 REV 02, P-1300 REV 02, P-1301 REV 02, P-1302 REV 02 and P-1303 REV 02.

Appendix A

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Reasoned Conclusions

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

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of that report. The conclusions have been integrated into the decision as to whether planning permission should be granted. An objection received states that the Environmental Statement refers to uses defined under the categories of the Town and Country Planning (Use Classes) Order 1987. The description of development refers to the same types of uses but as defined under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 which would potentially allow for a significantly different range of uses. Therefore, it is stated that the City of London need to determine that the Environmental Statement and all other documents adequately assess the proposed development.

The applicants and the City agreed the scope of the EIA prior to its submission. The ES provides details of the EIA methodology, the existing site, alternatives and design evolution, the proposed development, socio-economics, health, highways & transport, noise & vibration, air quality, wind microclimate, daylight/sunlight, overshadowing, light pollution & solar glare, townscape, built heritage & visual, climate change, greenhouse gas emissions, waste and cumulative effects. The ES Addendum submitted under Regulation 25 of the EIA Regulations addresses the proposed amendments contained within the submission and sets out additional assessment of daylight, sunlight, overshadowing and solar glare effects and wind microclimate effects. It is considered that the likely significant effects of the proposed development on the environment are as described in the ES, ES Addendum and further and other information, and as, where relevant, referred to in the report.

Should planning permission be granted, it would authorise a range of uses. The assessment contained in the ES is based on the uses proposed, namely office, flexible retail space and public terrace uses. The floor areas proposed to be devoted to each use are described in the application materials and summarised in the ES. The application does not state that the development seeks unrestricted Class E business and commercial uses. Conditions are recommended that requires the development to implemented only in accordance with the specific floor areas and uses as set out and assessed in the application, removing the ability, without consent, to subsequently change to other uses specified within Class E.

The following conditions are recommended:

1. The development shall provide:

- 33,137 sq.m. GIA of office floorspace (Class E);
- 580 sq.m. GIA flexible retail use (Class E, drinking establishment (sui generis), hot food takeaway (sui generis.))
- 928 sq.m GIA sui generis Public Hall;
- 847 sq.m GIA Sui Generis Heritage Garden and Cultural Space

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

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

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

3. The areas shown on the approved drawings as offices, flexible retail use (Class E, drinking establishment (sui generis), hot food takeaway (sui generis)) and public viewing gallery and garden with ancillary space, and as set out in Condition 62 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020).

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development

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

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the Construction Environmental Management Plan, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, a Service Vehicle Lift Maintenance Strategy, a Cycling Promotion Plan. Mitigation measures should be secured including additional wind mitigation measures to the Public Garden terrace. These, as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the S106 agreement, recommended conditions and the S278 agreements. Any remedial action

necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions.

Appendix B

London Plan Policies

1. Policy CG1 Building Strong and Inclusive Communities

- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D14 Noise
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking

- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

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)

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
 Policy 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

Policy VT3 Vehicle Parking
 S10 Active travel and healthy streets
 AT1 Pedestrian movement
 AT2 Active travel including cycling
 AT3 Cycle parking
 S11 Historic environment
 HE1 Managing change to heritage assets
 HE2 Ancient monuments and archaeology
 HE3 Setting of the Tower of London World Heritage Site
 S12 Tall Buildings
 S13 Protected Views
 S14 Open spaces and green infrastructure
 OS1 Protection and Provision of Open Spaces
 OS2 City greening
 OS3 Biodiversity
 OS4 Trees
 S15 Climate resilience and flood risk
 CR1 Overheating and Urban Heat Island effect
 CR3 Sustainable drainage systems (SuDS)
 S16 Circular economy and waste
 CE1 Zero Waste City
 S21 City Cluster
 S27 Planning contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- ☐ Air Quality SPD (July 2017);
- ☐ Archaeology and Development Guidance SPD (July 2017);
- ☐ City Lighting Strategy (October 2018);
- ☐ City Transport Strategy (May 2019);
- ☐ City Waste Strategy 2013-2020 (January 2014);
- ☐ Protected Views SPD (January 2012);
- ☐ City of London's Wind Microclimate Guidelines (2019);
- ☐ Planning Obligations SPD (July 2014);
- ☐ Open Space Strategy (2016);
- ☐ Office Use SPD (2015);
- ☐ City Public Realm (2016);
- 1. Cultural Strategy 2018 – 2022 (2018).
- 2. Eastcheap Conservation Area Character Summary and Management Strategy SPD 2013
- 3. Leadenhall Market Conservation Area Character Summary and Management Strategy SPD 2017
- 4. Bank Conservation Area Character Summary and Management Strategy SPD2012

Relevant Local Plan Policies

CS1 Provide additional offices

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

CS2 Facilitate utilities infrastructure

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

CS3 Ensure security from crime/terrorism

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

CS4 Seek planning contributions

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

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.

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.

CS13 Protect/enhance significant views

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

CS14 Tall buildings in suitable places

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

CS15 Creation of sustainable development

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

CS16 Improving transport and travel

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

CS17 Minimising and managing waste

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

CS18 Minimise flood risk

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

CS19 Improve open space and biodiversity

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

CS20 Improve retail facilities

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

CS21 Protect and provide housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown

in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

CS22 Maximise community facilities

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

DM1.3 Small and medium business units

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

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

DM1.5 Mixed uses in commercial areas

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

DM2.1 Infrastructure provision

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

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

- a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply (TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
- b) reasonable gas and water supply considering the need to conserve natural resources;

- c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
- d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
- e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

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

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

DM3.2 Security measures

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

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

DM3.3 Crowded places

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

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

DM3.4 Traffic management

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

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

DM3.5 Night-time entertainment

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

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

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

DM10.1 New development

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

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

DM10.2 Design of green roofs and walls

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

DM10.3 Roof gardens and terraces

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

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

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

DM10.4 Environmental enhancement

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

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

DM10.7 Daylight and sunlight

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

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

DM10.8 Access and inclusive design

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

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

DM11.2 Public Art

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

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

DM12.1 Change affecting heritage assets

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

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

DM12.2 Development in conservation areas

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

DM12.3 Listed buildings

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

DM12.4 Archaeology

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

DM15.1 Sustainability requirements

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

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

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

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

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

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

DM15.2 Energy and CO2 emissions

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

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

- a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
- b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
- c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
- d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

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

the development where feasible and connection infrastructure should be incorporated wherever it is viable.

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

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

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

DM15.4 Offsetting carbon emissions

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

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

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

DM15.5 Climate change resilience

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

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

DM15.6 Air quality

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

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

DM15.7 Noise and light pollution

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

DM16.1 Transport impacts of development

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

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

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

DM16.2 Pedestrian movement

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

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

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

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

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

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

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

DM16.3 Cycle parking

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

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.

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.

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.

2. New open space should:

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

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

DM19.2 Biodiversity and urban greening

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

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

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:
 - 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;
 - the contribution the unit makes to the function and character of the PSC;
 - 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.

Relevant Local Plan Policies

CS1 Provide additional offices

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

CS2 Facilitate utilities infrastructure

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

CS3 Ensure security from crime/terrorism

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

CS4 Seek planning contributions

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

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.

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.

CS13 Protect/enhance significant views

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

CS14 Tall buildings in suitable places

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

CS15 Creation of sustainable development

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

CS16 Improving transport and travel

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

CS17 Minimising and managing waste

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

CS18 Minimise flood risk

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

CS19 Improve open space and biodiversity

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

CS20 Improve retail facilities

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

CS21 Protect and provide housing

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

CS22 Maximise community facilities

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

DM1.3 Small and medium business units

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

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

DM1.5 Mixed uses in commercial areas

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

DM2.1 Infrastructure provision

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

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

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

DM3.2 Security measures

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

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

DM3.3 Crowded places

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

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

DM3.4 Traffic management

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

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

DM3.5 Night-time entertainment

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

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

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

DM10.1 New development

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

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;

- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

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

DM10.3 Roof gardens and terraces

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

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces.

Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

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

DM10.7 Daylight and sunlight

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

DM10.8 Access and inclusive design

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

- a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;

- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

DM12.1 Change affecting heritage assets

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

DM12.2 Development in conservation areas

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

DM12.3 Listed buildings

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

DM12.4 Archaeology

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

DM15.1 Sustainability requirements

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

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:

- a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
- b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
- c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
- d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

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

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".
2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.

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

DM15.5 Climate change resilience

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

DM15.6 Air quality

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

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect

neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.

2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM16.1 Transport impacts of development

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

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.
2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

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

DM16.3 Cycle parking

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

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.

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.

DM19.1 Additional open space

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

DM19.2 Biodiversity and urban greening

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

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

- e) maintenance of habitats within Sites of Importance for Nature Conservation.

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.

DM22.1 Social and community facilities

1. To resist the loss of social and community facilities unless:
 - a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
 - b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
 - c) it has been demonstrated that there is no demand for another similar use on site.
2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.
3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:
 - a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
 - b) in locations which are convenient to the communities they serve;
 - c) in or near identified residential areas, providing their amenity is safeguarded;
 - d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.
4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

SCHEDULE

APPLICATION: **22/01155/FULEIA**

85 Gracechurch Street London EC3V 0AA

Partial demolition of existing building (Gracechurch Street frontage adapted) and the erection of a 32 storey (155.70m AOD) building plus basement levels including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); and Heritage Garden and Cultural Space at level 5 (sui generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

CONDITIONS

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

- 2 (a) Prior to demolition of the development: full details of the pre-demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.
(b) Prior to commencement of the development, excluding demolition: a detailed Circular Economy Statement shall be submitted to and

approved in writing by the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.

REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages reuse 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.

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

REASON: To ensure that the 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 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

- 4 Prior to the commencement of the development (excluding demolition) a Leadenhall Market District Heat Network Study must be submitted and approved in writing by the local planning authority. It must set out:
 - a. An update on the potential to supply heat to the Development via the nearest District Heat Network on acceptable commercial terms.

The update must include correspondence with the District Heat Network operators.

b. Subject to District Heat Network availability and feasibility pursuant to part a) above, the steps taken to engage with the operators of Leadenhall Market regarding potential District Heat Network connection via the basement of 85 Gracechurch Street. Such evidence may include alternative options for a connection within Leadenhall Market.

d. If applicable, a plan showing the location of a safeguarded Leadenhall Market District Heat Network connection space within the Development.

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

5 Prior to the commencement of development (excluding demolition) a Leadenhall Market Plant Rationalisation Study must be submitted and approved in writing by the local planning authority. It must set out:

a. The steps taken to engage with Leadenhall Market regarding potential plant rationalisation within an enclosure attached to the north elevation of 85 Gracechurch as shown as safeguarded on drawing ref P3200 Rev. 5.

b. If applicable, a detailed design of the plant enclosure for approval.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DMI0.1, DMI0.5, DM12.2.

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

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DMI0.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

7 Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated

and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.

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

- 8 No cranes shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport.

REASON: To ensure that the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport or London City Airport through penetration of the regulated airspace

- 9 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.

- 10 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.

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

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

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

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

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

REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 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.

- 14 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.

- 15 No development other than any demolition shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.
REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 16 Archaeological Evaluation will be carried out in accordance with a Written Scheme of Investigation for evaluation submitted to and approved in writing by the City of London Corporation in consultation with GLAAS prior to the commencement of development (excluding demolition to basement slab level).
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.
- 17 Prior to commencement (excluding demolition to basement slab level) and following completion of archaeological evaluation carried out in accordance with the Written Scheme of Investigation, a full archaeological mitigation strategy covering programme and methodology for the main site investigation, nomination of a competent organisation to understand the archaeological works, including details of all temporary works, and where necessary areas of and methods for preservation and display of remains, and programme of public engagement, contextual research, post-investigation assessment, analysis, publication and archiving, will be submitted to and approved in writing by the City of London Corporation in consultation with GLAAS.
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 18 Irrespective of any approved plans, prior to construction , full details of the proposed basement configuration and foundation design, and method statements, will be submitted to and approved in writing by the City of London Corporation in consultation with GLAAS.
REASON: To ensure the preservation and display of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

- 19 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

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

- 20 Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required

prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 21 The development shall incorporate such measures as are necessary within the site to resist structural damage and to protect the approved new public realm within the site, arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun .
REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 22 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems including blue roofs, rainwater pipework, flow control devices, pumps, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 1.7 litres per second from no more than one distinct outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 100m³;
 - (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; and
 - (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 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.
- 23 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) A Lifetime Maintenance Plan for the SuDS system to include:
 - A full description of how the system would work, it's aims and objectives and the flow control arrangements;
 - A Maintenance Inspection Checklist/Log;

- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required, and the costs incurred to maintain the system.
REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.
- 24 Before any construction works hereby permitted are begun details of rainwater harvesting and grey water recycling systems 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.
- 25 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.
- 26 Before any construction works hereby permitted are begun details of the structural design and reduction of embodied carbon emissions of the proposed superstructure shall be submitted to and approved in writing by the local planning authority.
REASON: To ensure whole life-cycle carbon emissions are further reduced in compliance with Policy SI 2 of the London Plan.
- 27 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) particulars and samples of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces, including details of compliance with approved Circular Economy Strategy;

- (b) details of the proposed new facades including details of a typical bay of the development for each facade and fenestration;
- (c) details of the rooftop including details of the sedum roof and plant enclosure;
- (d) details of canopies;
- (e) typical masonry details, including jointing and any necessary expansion/movement joints;
- (f) details of ground and first floor elevations including all entrances, integrated seating, vitrines and information boards;
- (g) details of semi-internal elevations fronting the ground floor public routes;
- (h) full details of the Heritage Garden, including all elevations, flooring, entrances, fenestration, planters, seating, lighting, soffit, drainage, irrigation and any infrastructure required to deliver programming and varied uses;
- (i) full details of the Ground Floor Public Hall, including all elevations, flooring, entrances, fenestration, planters, seating, lighting, soffit, drainage, irrigation, vehicle lifts, roller shutters and any infrastructure required to deliver programming and varied uses;
- (j) details of soffits, hand rails and balustrades, including those soffits in the Public Hall areas of the ground floor;
- (k) details all party wall treatments;
- (l) details of junctions with adjoining premises, including any new or reinstated chimney stacks or other roofline features to the Market;
- (m) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;
- (n) details of all drainage, irrigation and rainwater harvesting;
- (o) details of the integration of M&E and building services into the external envelope;
- (p) details of the provision for future linkages to Leadenhall Market retail units at first floor level; and
- (q) details of the enclosure on the north elevation for Leadenhall Market plant equipment.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DMI0.1, DMI0.5, DM12.2.

- 28 Before any works thereby affected are begun details of the proposed works to the adapted Gracechurch Street frontage including (i) methodology for its adaptation and reinstatement (ii) details of the treatment of existing fenestration (iii) details of the new fenestration (iv) details of the enlargement of the main entrance portal (v) details of any requisite cleaning and (vi) repair works 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

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a

satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DMI0.1, DMI0.5, DM12.2.

- 29 Before any works thereby affected are begun, details of all balustrades to external terrace areas and associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and the balustrades shall be delivered as approved and retained for the life of the building, unless otherwise approved in writing.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DMI0.1, DMI0.5, DM12.2.

- 30 Before the works thereby affected are begun, sample panels of agreed sections of the facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DMI0.1, DMI0.5, DM12.2.

- 31 All unbuilt surfaces, including the podium, terraces, balconies, roof terrace, tenant garden, undercroft, new public route and trees, shall be treated in accordance with a landscaping scheme, including details of:

- (a) Irrigation;
- (b) Provision for harvesting rainwater run-off from road to supplement irrigation;
- (c) Spot heights for ground levels around planting pit;
- (d) Soil;
- (e) Planting pit size and construction;
- (f) Tree guards; and
- (g) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development.

to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.

REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DMI0.1, DM19.2.

- 32 Before any works hereby affected are begun, details of a holistic urban greening strategy, including hard landscaping, materials and an appropriate maintenance regime for
- (a) the cascade of roof terraces and surfaces, to include green roofs, hedges, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening;
 - (b) the incorporation of blue roofs into roof surfaces; and
 - (c) the landscaping of the public realm.
- Shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details and 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.
- 33 Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.
- REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.
- 34 Prior to the commencement of the relevant works, a final Lighting Strategy and a 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; and
 - details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering.

All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7, CS15 and emerging policies DE1, DE2 and HL3 of the Draft City Plan 2036

- 35 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the retail uses (Class E and sui generis) and any Class E (office) kitchens. Flues must terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the said use takes place and retained for the life of the building.

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

- 36 No cooking shall take place within any Class E or sui generis 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.

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

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

- 38 Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants,

and must be located away from ventilation intakes and accessible roof gardens and terraces.

REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.

- 39 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.
- 40 Prior to first occupation confirmation shall be provided that either: all water network upgrades required to accommodate the additional flows to serve the development have been completed; or a housing and infrastructure phasing plan has been agreed with Thames Water to allow occupation. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.
REASON: The development may lead to no/ low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.
- 41 No later than 3 months after completion of the building and prior to the development being occupied, a post-completion Circular Economy Statement, to include details of material passports for the retained and proposed materials, shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.
REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.
- 42 Prior to occupation of the building the following details relating to signage shall be submitted to and approved in writing by the Local

Planning Authority and all signage placed on the development site shall be in accordance with the approved details:

(a) A Signage strategy for the retail units within the development shall be submitted;

(b) A Signage strategy relating to the Heritage Garden shall be submitted and this strategy shall make provision for clear signs to be placed in prominent positions on the development site, including signage indicating the access point for the publicly accessible free space and culture offer; and

(c) The signage relating to the Heritage Garden and cultural space shall also be included within the overall strategy.

All signage relating to the public viewing gallery and winter garden (as approved in the signage strategy) must be erected and in place on the development site prior to occupation of the building.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DMI0.1, DMI0.5, DMI0.8, DM12.1, DM12.2 and DM15.7.

- 43 Prior to the installation of any generator a report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to an 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.
- 44 Within 6 months of completion details must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.
REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.
- 45 (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.

- 46 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

- 47 Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.
- REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.

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

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

- 49 A post construction BREEAM assessment demonstrating that a target rating of 'Outstanding' has been achieved (or a minimum rating of 'Excellent' as the local planning authority may agree, provided that it is satisfied all reasonable endeavours have been used to achieve an 'Outstanding' rating) shall be submitted as soon as practicable after practical completion.

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

- 50 No later than 3 months after completion of the building to shell and core and prior to the development being occupied, 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 and the GLA at: ZeroCarbonPlanning@london.gov.uk. The post-construction assessment shall provide an update to the detailed Whole Life-Cycle Carbon Assessment submitted after RIBA Stage 4, 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, unless otherwise agreed. The developer shall use the post construction tab of the GLA's WLC assessment template and the relevant forms must be completed accurately and in their entirety in line with the criteria set out in the latest GLA's WLC assessment guidance.

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

- 51 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 505 long stay pedal cycle spaces, and a minimum of 114 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.

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

- 53 Before any works thereby affected are begun, the layout and the arrangement of the long stay and short stay cycle parking shall be submitted to and approved in writing by the Local Planning Authority in consultation with Transport for London. The cycle parking detailed in the approved arrangement plans and report shall thereafter be maintained in accordance with the approved plan(s) for the life of the building.

REASON: To ensure the cycle parking is accessible and has regard to compliance with the London Cycling Design Standards in accordance with the following policy of the Local Plan: DM16.3 and London Plan policy: TS

- 54 Unless otherwise agreed in writing by the Local Planning Authority a minimum of 53 showers and 505 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.
- 55 A clear unobstructed minimum headroom of 5m must be maintained for the life of the building in the refuse skip collection area as shown on the approved drawings and a clear unobstructed minimum headroom of 4.75m must be provided and maintained over the remaining areas and access ways.
REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with the following policy of the Local Plan: DM16.5.
- 56 Except as may be approved in writing by the Local Planning Authority the loading and unloading areas at basement level must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.
- 57 Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.
- 58 Facilities must be provided and maintained for the life of the development so that vehicles may enter and leave the building by driving in a forward direction.
REASON: To ensure satisfactory servicing facilities and in the interests of public safety in accordance with the following policy of the Local Plan: DM16.5.
- 59 No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Tuesday to Saturday and between 21:00 on one day and 07:00 on the following day on Sundays and Mondays. Servicing includes the loading and

unloading of goods from vehicles and putting rubbish outside the building.

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

- 60 Details of a Servicing Management Plan demonstrating the arrangements for control of the arrival and departure of vehicles servicing the premises shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. The building facilities shall thereafter be operated in accordance with the approved Servicing Management Plan (or any amended Servicing Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the building.
REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: DM16.1.
- 61 Two electric charging points must be provided within the delivery and servicing area and retained for the life of the building.
REASON: To further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS16 and draft Local Plan 2036 Policy VT2.
- 62 The threshold of all vehicular and pedestrian access points shall be at the same level as the rear of the adjoining footway.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DMI0.8, DM16.2.
- 63 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DMI 7.1.
- 64 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety and to accord with Section 153 of the Highways Act 190
- 65 Unless otherwise approved by the Local Planning Authority, 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.

- 66 With the exception of the public terrace at Level 5, the terraces hereby permitted shall not be used or accessed between the hours of 22:00 (or nautical dusk, whichever is later) on one day and 08:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.

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

- 67 No live or recorded music shall be played on the level 5 terrace between the hours of 22:00 on one day and 08:00 on the following day.

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

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

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

- 69 Live or recorded music shall not be in excess of 65dBA at the Gracechurch Street or Lime Street Passage entrances and the edge of the terrace at level 5.

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

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

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

- 71 Before any works thereby affected are begun, details of the proposed interpretation, content and displays of the Public Hall and the Heritage Garden, including signage, to interpret and explain the Roman Basilica-Forum, the archaeology and history of the site shall be submitted to and approved in writing by the Local Planning Authority.

REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.4

- 72 The development shall be carried out in accordance with the approved details within the Fire Strategy. Document titled: 85 Gracechurch Street Fire Statement dated 25 November 2022 by ARUP
REASON: To ensure that the development incorporates the necessary fire safety measures.
- 73 The areas within the development marked as retail on the floorplans at ground and first and fifth level hereby approved, shall be used for retail purposes within Class E (shop, financial and professional services and cafe or restaurant) and sui generis (pub and drinking establishment, and take-away) and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England)Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.2.
- 74 The areas shown on the approved drawings above ground floor as offices, flexible retail use (Class E, drinking establishment (sui generis), hot food takeaway (sui generis)), Public Hall and Heritage Garden with ancillary space, and as set out in Condition 75 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020).
REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.
- 75 The development shall provide:
- 37,098 sq.m Office Use (Class E);
 - 620 sq.m Flexible Retail (Class E (a) (b) and (c));
 - 946 sq.m Public Hall (Sui Generis); and
 - 892 sq.m Heritage Garden and Cultural space (Sui Generis)
- REASON: To ensure the development is carried out in accordance with the approved plans.
- 76 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:
Approved drawings: P-1000 REV 02, P-1100 REV 02, P-1101 REV 02, P-1211 REV 02, P-1212 REV 02, P-1213 REV 02, P-1214 REV 02, P-1215 REV 02, P-1216 REV 02, P-1217 REV 02, P-1218 REV 02, P-1219 REV 02, P-1220 REV 02, P-1221 REV 02, P-1304 REV 02, P-1305 REV 02, P-1306 REV 02, P-1307 REV 02, P-2200 REV 03, P-

2201 REV 04, P-2202 REV 04, P-2203 REV 04, P-2204 REV 05, P-2205 REV 05, P-2206 REV 05, P-2207 REV 05, P-2208 REV 05, P-2209 REV 04, P-2210 REV 04, P-2211 REV 04, P-2212 REV 04, P-2213 REV 04, P-2214 REV 04, P-2215 REV 04, P-2216 REV 04, P-2217 REV 04, P-2218 REV 04, P-2219 REV 04, P-2220 REV 04, P-2221 REV 04, P-2222 REV 04, P-2223 REV 04, P-2224 REV 04, P-2225 REV 04, P-2226 REV 04, P-2227 REV 04, P-2228 REV 04, P-2229 REV 04, P-2230 REV 04, P-2231 REV 04, P-2232 REV 04, P-2233 REV 04, P-2234 REV 04, P-2235 REV 04, P-2236 REV 05, P-2237 REV 04, P-2238 REV 04, P-2239 REV 04, P-3200 REV 05, P-3201 REV 05, P-3202 REV 05, P-3203 REV 04, P-3204 REV 02, P-3205 REV 02, P-3206 REV 02, P-3207 REV 02, P-3208 REV 04, P-3209 REV 04, P-3400 REV 02, P-3401 REV 02, P-3402 REV 02, P-3403 REV 02, P-3404 REV 02, 8379-PL-UGF-104 REV 02 and 8379-PL-UGF-105 REV 02.

Approved documents: Alternative Basement Concept by Woods Bagot.

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 During the construction phase of the development, the City of London Corporation encourages all owners/developers to commit to the principles outlined in the City of London Corporation's Local Procurement Charter, i.e.

- to identify opportunities for local small to medium sized businesses to bid/tender for the provision of goods and services;

- aim to achieve the procurement of goods and services, relating to the development, from small to medium sized businesses based in the City and the surrounding boroughs, towards a target of 10% of the total procurement spend;

- or where the procurement of goods and services is contracted out

- ensure the above two principles are met by inserting local procurement clauses in the tender documentation issued to contractors or subcontractors (further information can be found in our 'Guidance note for developers').

For additional details please refer to the City of London's 'Local Procurement Charter' and 'Local Procurement - Guidance Note for City Developers'. These documents can be found at

http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Planning

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

To access free support in procuring locally please call 020 7332 1532 or email city.procurement@cityoflondon.gov.uk

- 3 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).

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.

- 4 This permission must in no way be deemed to be an approval for the display of advertisement matter indicated on the drawing(s) which must form the subject of a separate application under the Advertisement Regulations.
- 5 This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.
- 6 This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation or Transport for London as Highway Authority; and work must not be commenced until the consent of the Highway Authority has been obtained.
- 7 Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.
- 8 The Department of the Built Environment (Transportation & Public Realm Division) must be consulted on the following matters which require specific approval:
 - (a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.
 - (b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the Department of the Built Environment Transportation and Public Realm Division is recommended to ensure

the design of the building provides for the inclusion of street lighting.

(c) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway).

You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. Please contact the Corporate Property Officer, City Surveyor's Department.

(d) Bridges over highways

(e) Permanent Highway Stopping-Up Orders and dedication of land for highway purposes.

(f) Connections to the local sewerage and surface water system.

(g) Carriageway crossovers.

(h) Servicing arrangements, which must be in accordance with the City of London Corporation's guide specifying "Standard Highway and Servicing Requirements for Development in the City of London".

9 The Markets and Consumer Protection Department (Environmental Health Team) must be consulted on the following matters:

(a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has already been granted, further planning approval will also be required.

(b) Installation of engine generators using fuel oil.

(c) The control of noise and other potential nuisances arising from the demolition and construction works on this site the Department of Markets and Consumer Protection should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.

(d) Alterations to the drainage and sanitary arrangements.

(e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments in particular:

- the identification, encapsulation and removal of asbestos in accordance with a planned programme;
- provision for window cleaning (internal and external) to be carried out safely.

(f) The use of premises for the storage, handling, preparation or sale of food.

(g) Use of the premises for public entertainment.

(h) Approvals relating to the storage and collection of wastes.

(i) The detailed layout of public conveniences.

(j) Limitations which may be imposed on hours of work, noise and other environmental disturbance.

(k) The control of noise from plant and equipment;

(l) Methods of odour control.

10 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:

Noise and Dust

(a)

The construction/project management company concerned with the development must contact the Department of Markets and Consumer Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work. Restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(b)

Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise, dust etc. The code can be accessed through the City of London internet site, www.cityoflondon.gov.uk, via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department.

(c)

Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act 1974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the Environmental Protection Act 1990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(d)

Deconstruction or Construction work shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise from the site has been submitted to and approved by the Markets and Consumer Protection Department including payment of any agreed monitoring contribution.

Air Quality

(e)

Compliance with the Clean Air Act 1993

Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

Boilers and CHP plant

(f)

The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NO_x emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2015.

(g)

All gas Combined Heat and Power plant should be low NO_x technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2015.

(h)

When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Markets and Consumer Protection Department would prefer developers not to consider installing a biomass burner as the City is an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread

use of these appliances has the potential to increase particulate levels in London to an unacceptable level. Until the Markets and Consumer Protection Department is satisfied that these appliances can be installed without causing a detriment to the local air quality they are discouraging their use. Biomass CHP may be acceptable providing sufficient abatement is fitted to the plant to reduce emissions to air.

(i)

Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

Standby Generators

(j)

Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection.

(k)

There is a potential for standby generators to give out dark smoke on start up and to cause noise nuisance. Guidance is available from the Department of Markets and Consumer Protection on measures to avoid this.

Cooling Towers

(l)

Wet cooling towers are recommended rather than dry systems due to the energy efficiency of wet systems.

Ventilation of Sewer Gases

(o)

The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these ventilation grills have been blocked up by Thames Water Utilities. These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Markets and Consumer Protection strongly recommends that a sewer vent pipe be installed in the building terminating at a safe outlet at roof level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level

away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

Food Hygiene and Safety

(p)

Further information should be provided regarding the internal layout of the proposed food/catering units showing proposals for staff/customer toilet facilities, ventilation arrangements and layout of kitchen areas.

(q)

If cooking is to be proposed within the food/catering units a satisfactory system of ventilation will be required. This must satisfy the following conditions:

Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance;

The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. It cannot be assumed that ductwork will be permitted on the exterior of the building;

Additional methods of odour control may also be required. These must be submitted to the Markets and Consumer Protection Department for comment prior to installation;

Ventilation systems for extracting and dispersing any emissions and cooking smells to the external air must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent such smells and emissions adversely affecting neighbours.

- 11 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.
- 12 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.
- 13 The Crime Prevention Design Advisor for the City of London Police should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.

14 The investigation and risk assessment referred to in condition **** must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme must be submitted to and approved in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report must be submitted to and approved in writing by the Local Planning Authority. The report of the findings must include:

(i) a survey of the extent, scale and nature of contamination;

(ii) an assessment of the potential risks to:

- human health,
- property (existing or proposed) including buildings, open spaces, service lines and pipes,
- adjoining land,
- groundwaters and surface waters,
- ecological systems,
- archaeological sites and ancient monuments;

(iii) an appraisal of remedial options, and proposal of the preferred option(s).

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

15 The grant of approval under the Town and Country Planning Acts does not overcome the need to also obtain any licences and consents which may be required by other legislation. The following list is not exhaustive:

(a) Fire precautions and certification:

London Fire Brigade, Fire Prevention Branch
5-6 City Forum
City Road
London EC1N 2NY

(b) Public houses, wine bars, etc.

City of London Corporation
Trading Standards and Veterinary Service
PO Box 270
Guildhall
London EC2P 2EJ

(c) Inflammable materials (e.g., petroleum)

London Fire Brigade, Petroleum Department
5-6 City Forum
City Road

London EC1N 2NY

(d) Works affecting Transport for London operational land and structures:

Borough Integration and Partnerships
Transport for London
Windsor House
42-50 Victoria Street
London, SW1H 0TL

(e) Works affecting a GLA road:

Borough Integration and Partnerships
Transport for London
Windsor House
42-50 Victoria Street
London, SW1H 0TL

- 16 The Directorate of the Built Environment (District Surveyor) should be consulted on means of escape and constructional details under the Building Regulations and London Building Acts.
- 17 Consent may be needed from the City Corporation for the display of advertisements on site during construction works. The display of an advertisement without consent is an offence. The City's policy is to restrain advertisements in terms of size, location, materials and illumination in order to safeguard the City's environment. In particular, banners at a high level on buildings or scaffolding are not normally acceptable. The Built Environment (Development Division) should be consulted on the requirement for Express Consent under the Town & Country Planning (Display of Advertisements) (England) Regulations 2007.
- 18 Access for disabled people is a material consideration in the determination of planning applications. The City of London's Access Advisor has assessed the planning application to ensure that the proposal meets the highest standards of accessibility and inclusive design required by London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and Draft City Plan 2036 Policy HL1. The Access Advisor promotes good practice standards of inclusive design and encourages early consideration of accessibility in the design process so that a truly inclusive environment can be achieved that everyone will be able to visit, use and enjoy.
- Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.
- 19 All reasonable endeavours are to be used to achieve a BREEAM 'Outstanding' rating and The City of London Corporation as Planning

Authority requests early discussion with the Applicant should it appear that the rating is likely to fall below outstanding.