

Committee:	Date:
Planning Application Sub-Committee	21 July 2023
Subject: 55 Bishopsgate London EC2N 3AS Demolition of the existing building and the erection of a part-63 storey (284.68 AOD) and part-22 storey (112.30 AOD) building plus basement, including office use (Class E); a publicly accessible multi-purpose space at ground floor level, part Level 02 and part Level 03 for a flexible use including: retail, food and beverage, drinking establishment, learning, community use, exhibition and/or performance space (Sui Generis); a public viewing gallery (Sui Generis), public realm improvements, cycle parking, servicing, vehicle lifts, refuse facilities and other works associated with the development including access and highways works.	Public
Ward: Cornhill	For Decision
Registered No: 22/00981/FULEIA	Registered on: 20 October 2022
Conservation Area:	Listed Building: No

Summary

Planning permission is sought for: Demolition of the existing building and the erection of a part-63 storey (284.68 AOD) and part-22 storey (112.30 AOD) building plus basement, including office use (Class E); a publicly accessible multi-purpose space at ground floor level, part Level 02 and part Level 03 for a flexible use including: retail, food and beverage, drinking establishment, learning, community use, exhibition and/or performance space (Sui Generis); a public viewing gallery (Sui Generis), public realm improvements, cycle parking, servicing, vehicle lifts, refuse facilities 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 a publicly accessible open ground floor public realm with space for pop up retail, a triple height free to visit roof top viewing gallery and external platform offering 360 degree views, event space, vehicle lifts which integrate into the landscaping and 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, including an air quality positive approach to minimising emissions and exposure to harmful pollutants, an increase in local greening and ecological value, energy efficient, 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 opening up of the ground floor, creating a route through the site, opening up to Bishopsgate. The site would play its part in the wider master plan for the area and connecting into the Tower 42 estate to the west with the introduction of a large permeable accessible ground floor, open to the public 24 hours a day.

The scheme provides areas to facilitate pop up retail kiosks at ground floor to animate the public realm.

The scheme provides a summit level public viewing gallery ('Conservatory') and outdoor viewing platform at rooftop level, both would provide a 360-degree view of the City of London.

Over 103,000 sq.m of Grade E commercial floorspace, of which over 80,000 sq.m would be flexible, sustainable Grade A office floorspace suitable for circa 7,000 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.

1,435 long term bicycle spaces would be provided with associated shower and locker facilities and 122 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 lifts within the building, the lids of which during the daytime would form part of the publicly accessible area and would be accessed via Bishopsgate.

Representations objecting to the proposals have been received from Historic England arising as result of: the main tower which would harm the City's historic environment and the wider London skyline. Historic England identify a low level of less than substantial harm is identified to the significance of St. Paul's Cathedral when viewed from Waterloo Bridge (LVMF 15B) and low to moderate, less than substantial harm to the significance of 18th and 19th century buildings near Whitehall from St James's Park (LVMF 26A).

The GLA identify a low level of less than substantial harm to the Outstanding Universal Value and Significance, authenticity and integrity of the Tower of London World Heritage Site, state that a very tall building would have far reaching impacts on heritage assets and designated views and raise concerns about the transport strategy.

Historic Royal Palaces consultation response states that the proposed development would have no impact on the setting of the Tower of London World Heritage Site due to its occlusion by other existing or permitted developments and so we have no objection.

Westminster City Council (WCC) object to the harmful impact upon the significance of designated heritage assets within Westminster, including historic townscape, sensitive views, including Waterloo Bridge (LVMF 15B 1-2) Golden Jubilee Bridge (LVMF 17B 1-2) St James Park (LVMF 26A) and from WCC's Metropolitan Views SPD Somerset House Terrace (view 22).

The Surveyor to the Fabric of St Paul's Cathedral consider the proposals, especially when viewed cumulatively with future (but already consented) development in the Cluster, would be contrary to the LVMF guidance with particular reference to LVMF 15 B 1-2. In terms of the significance of the Cathedral, the development would affect

key, historic views of the listed building that contribute to its architectural and historic interest and would cause harm.

The Twentieth Century Society object to the demolition of the existing building and consider it worthy of consideration as a non designated heritage asset.

Five further letters of objection have been received raising objections to the demolition of the existing building, height and the impact on designated heritage assets including LVMF views, townscape views, daylight and sunlight, wind and traffic.

Six representations have been received in support of the proposals, which state that the proposed building is of a high quality design.

The site is within the Central Activities Zone and highly sustainable with excellent access to transport infrastructure and able to support active travel and maintain pedestrian comfort for a high number of future employees. The site is central to the City's growth modelling and would deliver 14% of the required commercial space to meet projected economic and employment growth demand. This quantity of floorspace would contribute to maintaining the City's position as the world's leading international financial and business centre.

The site is considered to be appropriate for a tall building. The proposal draws support in terms of locational requirements for a tall building London Plan Policy D9 A, B and D, Local Plan Policy CS 14(1,2, 4), CS7 (1,2 4-7) Emerging City Plan S12 (1,3-6) S21 (1,3-8). There is some conflict with London Plan D9 C (1) (a and d), Local Plan CS 14 (3), CS 7(3) and Emerging City Plan S12 (2) and S21 (2) due to adverse visual indirect impacts on designated heritage assets and protected views. These conflicts are considered as part of the overall planning balance in the conclusion of the report.

The proposal amounts to a complex and high-quality piece of architecture and urban design comprising two linked blocks in response to local and pan-London contexts and a distinctive addition to the composition of the cluster on the skyline. The GLA support the overall architectural approach and consider the design slender, distinctive, well considered and high quality. Various conditions are proposed to ensure that the promise of the proposals is fully realised at detailed design, construction, and operational stage.

The proposal would draw some conflict with heritage aspects of design policies Local Plan CS10, DM10.1, Emerging City Plan Policy S8 (9) DE2 and London Plan Policy D3 (11). Overall, the proposal strikes a balance between balancing heritage impacts

and optimising the use of land, delivering high quality office space, and a multi-layered series of flexible cultural opportunities externally and through the buildings and will provide additional public realm. 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 terms of macro impacts officers concur with Historic England, the GLA and other objectors that the proposal would fail to preserve the characteristics and composition of: LVMF 15B.1-2 Waterloo Bridge and to a lesser extent LVMF 17 B.1 -2 Golden Jubilee/Hungerford Bridge; and LVMF 26A St James's Park. These impacts would draw some conflict with Local Plan Policy CS13, Emerging City Plan Policy S13 and London Plan Policy HC4, GLA's London Views Management Framework SPG and City of London's Protected Views SPD.

In other LVMF pan-London panoramas and some local views from the London Boroughs of Southwark and Lambeth officers conclude the development would consolidate and enhance the visual appearance of the City Cluster on the skyline.

The development would preserve the experiences from public high-level viewing platforms including from Monument, St Paul's Cathedral Stone Gallery and Golden Gallery and existing and emerging roof terraces which are also important to the character of the City of London.

After rigorous assessment officers conclude 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 Local Plan Policy CS12, CS13 (3) Emerging City Plan Policy S11, HE1, HE3 London Plan Policy HC2 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG. Historic Royal Palaces (HRP) raise no objections to impacts.

Whilst 55 Bishopsgate is an appropriate location for a tall building the development would bring a very tall buildings closer to St Paul's Cathedral and shift the compositional relationship between Cathedral and City Cluster. The impact would be a slight erosion to the current established setting and the contribution to the significance of St Paul's Cathedral. Officers concur with Historic England, GLA and other objectors and acknowledged that there would be low levels of less than substantial harm to the significance of St Paul's Cathedral (grade I) as experienced from Waterloo Bridge and Golden Jubilee/Hungerford Bridge. The

development would also slightly erode the Cathedral as an identified Historic City Landmark and Skyline feature.

The height of the development has far reaching in-direct visual impacts on the significance of designated heritage assets within the City of Westminster these assets comprise: Whitehall Court (grade II*); Horse Guards (grade I); and the War Office/Ministry of Defence (grade II*) as experienced from St James's Park. The development would result in a low level of less than substantial harm to these designated heritage assets. There would also be a slight level of less than substantial harm to St James's Park (grade I) as a Registered Historic Park and Gardens of Special Interest in England (RPG).

Due to the identified impact on St Paul's Cathedral and other designated heritage assets the proposal draws conflicts with aspects of heritage policies and guidance Local Plan Policies CS12, DM12.1, DM12.5, CS13); Emerging City Plan Policies S11, HE1 S12, S13; and London Plan HC1.

The proposed development would not preserve the significance of 52-68 Bishopsgate (Grade II) or St Helen's Place Conservation Area and would respectively result in a low and a slight level of less than substantial harm to their significance.

The proposal would preserve the special interest/significance and setting of the listed buildings at the Tower of London, Leadenhall Market, The Monument, 7-9 Gracechurch Street, Cannon Street Station Towers, Former Port of London Authority Building, St Botolph Without Bishopsgate Church, the Guildhall, St Mary Aldermanbury Church, St Lawrence Jewry Church, St Augustine's Church, St Giles' Cripplegate, Tower Bridge, The Royal Exchange, 37-38 Threadneedle Street, 46-48 Bishopsgate, National Bank Lothbury, 12 -14 Austin Friars, 23 Austin Friars, 13 Bishopsgate, 3-5 Bishopsgate (Royal Bank of Scotland) 7-9 Bishopsgate and 39 Threadneedle Street, Guildhall Church of St Ethelburga, the Church of St Helen, the City of London Club, Liverpool Street Station and the Great Eastern Hotel. It is considered the significance of the Bank, Guildhall, New Broad Street, Bishopsgate, Finsbury Circus, Leadenhall Market, Bunhill and Finsbury Square Conservation Areas would be unharmed.

The proposal would preserve the significance of Liverpool Street Arcade as a non-designated heritage asset. 55 Bishopsgate has limited architectural and historic values and does not meet the criteria to warrant non-designated heritage asset status.

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 and consolidation of the City Cluster has sought to safeguard the immediate setting of the Tower of London and St Paul's Cathedral. This scheme is located on the north western side of the eastern cluster and is a strategic site for the delivery of commercial floor space within the Eastern Cluster policy area as well as the City Cluster policy area of the emerging Local Plan and its Renewal Opportunity Area.

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 material considerations indicate otherwise.

It is the view of officers that, as a matter of planning judgement, that the proposals make will make a significant contribution to advancing the strategic business objectives of the City. The application draws support from strategic policies in particular those which encourage office development in the City and expansion of the eastern cluster, and public realm.

The identified impact on St Paul's Cathedral and other designated heritage assets draws conflicts with the heritage and LVMF aspects of policies and guidance specifically: Local Plan Policies CS7 (Eastern Cluster), DM10.1 (New Development) CS12 (Historic Environment) , DM12.1 Managing Change affecting all heritage assets and spaces), DM12.5 (Historic Parks and Gardens) CS13 (Protected Views) CS14 (Tall Buildings); Emerging City Plan Policies S11 (Historic Environment), HE1 (Managing Change to Heritage Assets) , S12 (Tall Buildings), S13 (Protected Views); S21 (City Cluster), London Plan D9 (Tall Buildings - Visual Impacts) , HC1 (Heritage Conservation and Growth), HC4 (LVMF); GLA's London Views Management Framework SPG and City of London's Protected Views SPD.

National Planning Guidance advises that conflict between development plan policies adopted at the same time must be considered in the light of all material considerations including local priorities and needs as guided by the NPPF.

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. Compliance with the development plan is to be considered by reference to the plan as a whole rather than asking whether the proposed development is in accordance with each and every policy in the plan. That approach recognises the fact that individual policies may pull in different directions, and that it would be difficult to find any project of significance that was wholly in accord with every relevant policy in the plan. Whilst there is some conflict with the tall building, strategic view and heritage policies mentioned above, given the counteracting benefits which promote other policies particularly delivery of office floor space, the proposals are considered to be acceptable.

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). St Paul's Cathedral, War Office/ Ministry of Defence, Horse Guards and St James Park (RPG) are all Grade I listed buildings, and this places these close to the very highest status level and as a result great weight should be given to the asset's conservation.

NPPF paragraph 202 requires that any less than substantial harm be balanced against the public benefits of the development proposal. The paragraph 202 balancing exercise is to be applied when considering the indirect impacts and resulting slight to low less than substantial harm to designated heritage assets including grade I listed buildings of the upmost heritage value.

Therefore, an evaluation of the public benefits and the weight afforded to them has been undertaken. In doing so great weight has been attached to the heritage significance of the designated heritage assets and to the advice from Historic England and the GLA. The merits of the proposals are finely balanced in this case. The delivery of the office space in this location and the economic benefits for the City and London and the 14 % contribution to meeting the evidenced based projected target for office demand is considered to be an exceptional benefit. In addition, there are wider public benefits including the free to access new roof top conservatory, cultural learning and exhibition spaces, public realm enhancements and contribution to the environmental enhancement of the areas are of moderate benefit. In this case the requirements of paragraph 202 are met. This conclusion is reached even when giving great weight to heritage significance as required under statutory duties.

When taking all matters into consideration, subject to the recommendations of this report, 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 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;

3. 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

55 Bishopsgate

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	59.87m AOD		284.68m AOD	
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Office	21,284sqm	Commercial (Class E)	103,073sqm (384% increase)
	Retail	774sqm	Multipurpose Publicly Accessible Space (Sui Generis)	2,545sqm
	Gym/Leisure	944sqm	Conservatory and Viewing Platform (Sui Generis)	1,773sqm
	Plant/Ancillary	4,485	Plant, BMU and Ancillary Space	17,640sqm
			Retail Kiosks (Class E)	58sqm
	TOTAL	27,487sqm	TOTAL	125,089sqm
			TOTAL UPLIFT:	97,602sqm
3. OFFICE PROVISION IN THE CAZ	<p>At 31st March 2022, 835,000 sq.m net increase in office floorspace had been delivered since 2016 and a further 576,000 sqm net was under construction or was permitted in the City. A further 589,000 sq.m net is required to meet the draft City Plan target of a minimum of 2 million sq.m net by 2036.</p> <p>The proposed development would deliver over 17% of this remaining floorspace target.</p>			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	<ul style="list-style-type: none"> 1,157 FTE (estimated) 		<ul style="list-style-type: none"> 7,429 -7,550 FTE (estimated) (552.5% increase) 	
5. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	17 standard spaces	Car parking spaces	2 blue badge spaces No standard spaces
	Cycle long stay	114	Cycle long stay	1,435 (compliant)
	Cycle short stay	0	Cycle short stay	122 (exceeds policy requirement)
	Lockers		Lockers	1554
	Showers		Showers	155
	Changing facilities		Changing facilities	Yes
6. HIGHWAY LOSS / GAIN	None			
7. PUBLIC REALM	2,344sqm of new public realm beneath the soffit of the tower and satellite buildings, providing a variety spaces. Referred to in the reports as the market room, the secret garden, and the loggia. This is an increase from 0sq.m to 2,344 sq.m (100% increase).			

<p>8. CULTURAL OFFER</p>	<p>The option to provide a permanent home for The London Centre has been the subject of collaborative dialogue with the NLA over an extended period of time to develop a holistic offer. A test-fit exercise has been undertaken in partnership with the NLA regarding the potential for The London Centre to be located in the building as an integral part of the Cultural Strategy. The proposals are the outcome of this extensive engagement with the NLA and demonstrates the flexibility of the cultural space proposed.</p> <p>The ground floor is a publicly accessible space that will comprise a combination of public realm, dwell spaces, opportunities for activation, public and building-user access. The intention is that this ground and lower ground floor spaces could be curated and activated as part of The London Centre experience.</p> <p>Levels 2 and 3 would comprise the primary functions of The London Centre, principally comprising an auditorium and exhibitions (including the home of the London model), and flexible space for temporary exhibits, learning space, meeting rooms and a cafe etc.</p> <p>Level 4 has been designed as a flexible co-working office space which could potentially also be operated as part of the London Centre, with the objective to ensure that the look and feel of Level 4 is physically and aesthetically contiguous with The London Centre on Level 2/3. There is the potential for a proportion of the co-working desks within Level 4 to be offered at a discount to market office rent.</p> <p>This is an increase from 0sq.m to 2,545 sq.m (100% increase).</p>	
<p>9. STREET TREES</p>	<p>EXISTING</p> <ul style="list-style-type: none"> • None 	<p>PROPOSED</p> <ul style="list-style-type: none"> • None
<p>10. SERVICING VEHICLE TRIPS</p>	<p>EXISTING</p> <p>Estimated 66 trips per day.</p>	<p>PROPOSED</p> <ul style="list-style-type: none"> • 136 trips per day (off-site consolidation proposed)
<p>11. SERVICING HOURS</p>	<p>10pm – 7am</p>	
<p>12. VOLUME OF RETAINED FABRIC</p>		
<p>13. OPERATIONAL CARBON EMISSION SAVINGS</p>	<ul style="list-style-type: none"> • Improvement against Part L 2013 using SAP 10 carbon factors (policy target 35% improvement)  • Improvement against Part L 2021 using SAP 10 carbon factors (policy target 35% improvement)  	

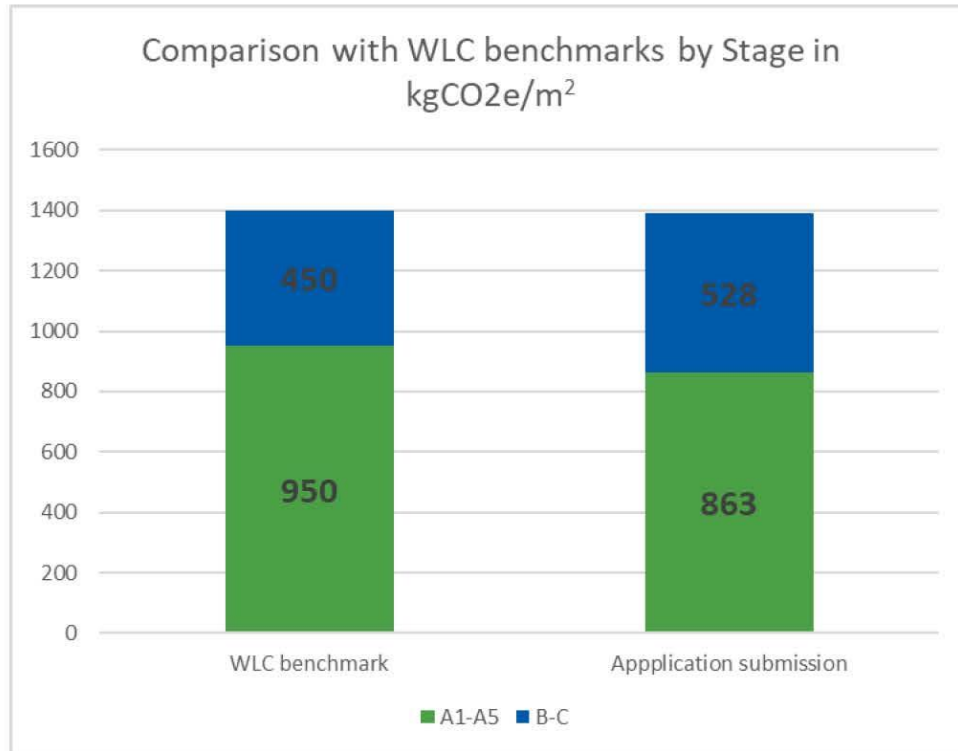
14. OPERATIONAL CARBON EMISSIONS

1,692,670 kgCO₂e/annum (based on 126,467 GIA for Offices)
 13,4 kgCO₂e/m²_{GIA}/annum
 803 kgCO₂e/m²_{GIA} over 60 years

(values cover Module B6 only, assume COG PAN 2023_04 carbon factors and no decarbonisation of the grid)

15. EMBODIED CARBON EMISSIONS

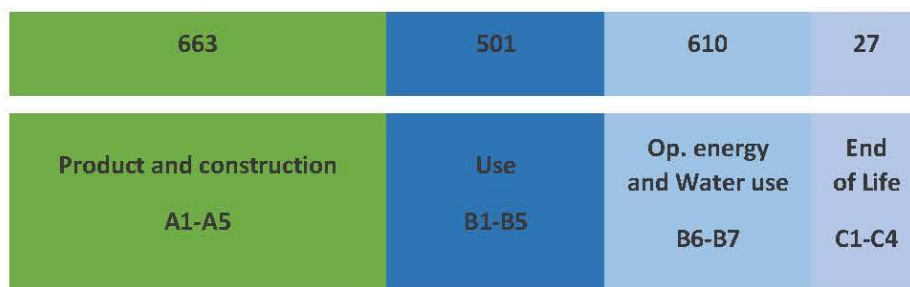
PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS



TOTAL: 123,693,530 kgCO₂e/60 years (A1-A5, B1-B5, C1-C4) (planning current position)

Results as per WLCA report rev.P05 issued for planning and GLA spreadsheet

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



TOTAL: 253,078,480 kgCO₂e/60 years (without decarbonisation and planning current position)

17. WHOLE LIFE-CYCLE CARBON OPTIONS

	Minor refurbishment	Major refurbishment + extension	Tall building + façade retention	Tall building	
Gross Internal Area (GIA)	27,481	38,163	113,874	126,497	m ²
Net Internal Area (NIA)	17,416	26,624	65,718	73,020	m ²
Increase in NIA	0	53	277	319	%
% material retained of existing	90	67	13	0	%
Embodied Carbon (A1-A5)	104	459	854	887	kgCO ₂ e/m ² GIA
Embodied Carbon Total (A1-A5)	2,858	17,518	97,276	112,230	tCO ₂ e
Embodied Carbon (A1-A5, B1-B5, C1-C4)	604	959	1,377	1,410	kgCO ₂ e/m ² GIA
Whole building Operational Energy	113	99	94	94	kWh/m ² /yr
Operational Energy (B6) (without decarb)	1,026	899	803	803	kgCO ₂ e/m ² GIA
Operational Energy (B6) (with decarb)	320	280	147	147	kgCO ₂ e/m ² GIA
Fuel source	Gas, electricity	Gas, electricity	Electricity	Electricity	
WLC Intensity (without decarb)	1,630	1,981	2,180	2,212	kgCO ₂ e/m ² GIA
WLC Total (without decarb)	44,807	75,603	248,144	279,862	tCO ₂ e
WLC Intensity (with decarb)	924	1,363	1,524	1,557	kgCO ₂ e/m ² GIA
WLC Total (with decarb)	25,399	52,020	173,517	196,943	tCO ₂ e

Tall building scenario aligns with planning application, with minor design development changes explaining in minor (>5%) changes in carbon results. B6 assumes COG PAN 2023_04 carbon factors

18. TARGET BREEAM RATING

- **Excellent** – aspiring to Outstanding (policy target Excellent or Outstanding)

G	VG	EXC	OUT
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19. URBAN GREENING FACTOR

- **0.30** (meets policy requirement of 0.3)

20. AIR QUALITY

No significant air quality effects identified during demolition or construction. Potential for increase in PM10 concentrations during operation, which will be mitigated to compliant levels during the design stage.

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.
3. 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.
4. 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.
5. Representations made by anybody 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.

6. The Environmental Statement is available online, together with the application, drawings, relevant policy documents and the representations received in respect of the application.
7. 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

8. The site is bounded by 99 Bishopsgate to the north; Bishopsgate to the east; a pedestrian route leading west to Old Broad Street and Tower 42 to the south; and the rear of 30-33 Old Broad Street to the west.
9. The existing building was constructed in the 1980s. It is eight storeys with a basement level and fills the majority of the site. The building is occupied by four retail units and the entrance to a gym (which occupies part of the ground and lower ground floor) on the ground floor with office floorspace above. The building comprises of 21,284 sq.m (GIA) of office floorspace, 774sq.m (GIA) or retail floorspace, 944 sq.m (GIA) of gym/leisure floorspace and 4,485 sq.m (GIA) of plant/ancillary space (Total floorspace 27,487 sq.m GIA)
10. The existing building is not Listed nor is it within a Conservation Area.
11. There are a number of designated heritage assets in the immediate vicinity of the site. These include:
 - St Helen's Place Conservation Area
 - Bank Conservation Area
 - Bishopsgate Conservation Area;
 - Bishopsgate Guild Church of St Ethelburga The Virgin (Grade I);
 - Great St Helen's Church of St Helen Bishopsgate (Grade I);
 - Bishopsgate No 13 - Westminster Bank (Grade I);
 - Hasilwood House 52-68 Bishopsgate (Grade II)
 - 46 and 48 Bishopsgate (Grade II)
 - 13 Bishopsgate (Grade I)
 - 3-5 Bishopsgate (Royal Bank of Scotland
 - 7-9 Bishopsgate and 39 Threadneedle Street (Lloyds Bank) (Grade II)
 - City of London Club, Old Broad Street (II*)
12. Other designated heritage assets in the wider area include:

- The Tower of London World Heritage Site (WHS, Scheduled Monument including Listed Buildings);
 - St Paul's Cathedral (Grade I)
 - Royal Exchange (Grade I)
 - Leadenhall Market (Grade II*);
 - 37-38 Threadneedle Street British Linen Bank (Grade II)
 - National Bank Lothbury (Grade II*)
 - 12- 14 Austin Friars (Grade II)
 - 23 Austin Friars (Grade II)
 - 7 and 9 Gracechurch Street (Grade II)
 - The Monument (Scheduled Monument and Grade I);
 - The Guildhall listed Grade I, Guildhall Library and Museum (Grade II*)
 - St Lawrence Jewry (Grade I)
 - Tower of Former Church of St Augustine (Grade I)
 - Former Port of London Authority (Grade II*)
 - Liverpool Street Station (grade II)
 - Great Eastern Hotel (grade II*)
 - Tower Bridge (Grade I)
 - Leadenhall Conservation Area
 - Guildhall Conservation Area
 - New Broad Street Conservation Area
 - Finsbury Circus Conservation Area
 - Finsbury Circus Registered Historic Park and Garden (Grade II)
 - Liverpool Street Arcade (Non-designated heritage asset)
 - Bunhill Fields and Finsbury Square Conservation Area
 - Whitehall Court (Grade II*)
 - Horse Guards (Grade I)
 - War Office / Ministry of Defence (Grade II*) and;
 - St James Park Registered Historic Park and Garden (Grade I)
 - Ministry of Defence (Grade I)
13. The Site appears in a number of views in the London View Management Framework (2012).
14. Bishopsgate 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:
- 'Demolition of the existing building and the erection of a part-63 storey (284.68 AOD) and part-22 storey (112.30 AOD) building plus basement, including office use (Class E); a publicly accessible multi-purpose space at ground floor level, part Level 02 and part Level 03 for a flexible use including: retail, food and beverage, drinking establishment, learning,

community use, exhibition and/or performance space (Sui Generis); a public viewing gallery (Sui Generis), public realm improvements, cycle parking, servicing, vehicle lifts, refuse facilities and other works associated with the development including access and highways works.'

16. The proposed scheme would provide 125,089 sq.m (GIA) of floorspace comprising:
 - 103,073 sq.m (GIA) of commercial floorspace (Class E);
 - 17,640 sq.m (GIA) of plant, BMU, and ancillary space associated with the commercial floorspace including bike storage, parking, lockers, and showers (Class E);
 - 2545 sq.m (GIA) of multi-purpose publicly accessible space part Level 02 & Level 03 (sui generis); and
 - 1773 sq.m (GIA) of conservatory and viewing platform roof top amenity space, including lower ground conservatory lobby (sui generis).
17. The maximum height of the proposed development would be 284.68 AOD.
18. The main tower would be 63 storeys above ground, with the attached satellite building 22 storeys in height above ground. The proposed development would predominantly be commercial office space (Class E), but includes publicly accessible space at ground floor, level 2 of the satellite building, level 3 of the satellite building and main tower and the conservatory and rooftop terrace at the top of the building. Co-working space would be provided at level 4.
19. The design of the building expresses the natural arching Fibonacci sequenced structure.

Consultations

Statement of Community Involvement

20. The Applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders. This included visiting neighbouring businesses and households on a one-to-one basis and delivering leaflets; a project website; advertisements on the 'City Matters' website; two rounds of google advertisements directing to the website; two phases of consultation events comprising of nine in-person public exhibitions and four online webinars; and meetings with stakeholders including elected representatives, business organisations, livery companies and neighbouring businesses.
21. The public consultation exhibitions were held at St Ethelburga's Church, Portsoken Community Centre and Artizan Street Library. In total 140 people attended these exhibitions, including City residents, workers and visitors. A further 14 people attended the online webinars.

22. In total, 44 responses were received. The feedback was in the main positive and supported the proposals for new publicly accessible space within roof level and at the lower levels of the building.

Statutory Consultation

23. Following receipt of the application, it has been advertised on site and in the press and has been consulted upon twice 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.
24. 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	
Department for Levelling Up, Housing and Communities	I confirm that we have no comments to make on the environmental statement.
Historic England	<p>Historic England objects to the application on heritage grounds.</p> <p>The main tower (284.68m AOD). would harm both the City’s historic environment and the wider London skyline.</p> <p>It would principally harm St. Paul’s Cathedral, when viewed from Waterloo Bridge (LVMF 15B), and St James’s Park and the striking ensemble of 18th and 19th century buildings near Whitehall, visible in the important protected view across its lake (LVMF 26A.1).</p> <p>The principal impacts of the proposals described above would be to the settings of St. Paul’s Cathedral, St James’s Park and the historic Whitehall buildings when seen in views from Waterloo Bridge and St. James’s Park, respectively.</p> <p>The harm to St. Paul’s stems from the way the proposed building increases the bulk and prominence of the Eastern Cluster in this view where the Cathedral derives significance from being the pre-eminent landmark in its setting. The proposed increase in height at what is often known as the ‘gateway’ to the Eastern Cluster would bring the bulk of the Cluster closer to the Cathedral, drawing the eye away from the Cathedral and reducing its prominence in favour of that of the Cluster, thereby</p>

harming its significance and adding to the cumulative impact of existing and consented modern tall buildings.

In terms of the NPPF, our view is that the harm to the significance of St. Paul's Cathedral would be at the low end of the spectrum of less than substantial harm. Nevertheless, the NPPF advises that any harm should be avoided, and given the very high significance of the Cathedral and the particularly great weight that should therefore be afforded to its conservation, even a low level of harm is cause for concern.

The proposed new building would also appear behind or adjacent to the historic roofline of the Whitehall buildings, specifically Horse Guards (Grade I listed) and Whitehall Court (Grade II* listed), in views from St James's Park that uniquely capture London's character as a city that sublimely combines historic architecture with historic landscapes. This encroachment reduces what is currently a largely unblemished and characterful profile of historic roof forms and introduces a modern form in the backdrop between the historic roofline and the existing modern tower at 22 Bishopsgate. It would be the first modern encroachment on the skyline to the left of Duck Island. The proposal would harm the significance of these buildings by reducing their prominence in this important view, and also by visually competing with their picturesque roof forms. This harm would also apply to the registered landscape, which derives some of its significance from the historic buildings in its setting.

The harm to the significance of the Whitehall buildings would be more acute than the harm identified above to St. Paul's Cathedral. In terms of the NPPF, Historic England judge the harm to be in the low to middle part of the spectrum of less than substantial harm due to the way the proposed tall building would encroach upon the historic rooflines of these buildings, competing with and drawing attention away from their picturesque form. The proposed tower would be the closest modern intrusion in the view and the first to breach the skyline to the left of Duck Island, adding cumulatively to harm caused by previously built or consented proposals further away. The harm identified above would be somewhat lower when applied to the significance of the Grade I registered St. James's Park as a whole, given the size of the historic landscape and the relatively isolated impact upon it.

Historic England acknowledge and broadly support the City's position of seeking publicly accessible spaces in the Eastern Cluster, but only where they would not harm the City's historic environment or the wider London skyline. In this case Historic England are concerned that any public benefits achieved through the provision of accessible public space are proposed at the

	<p>expense of London’s heritage. In their view, it would be perfectly possible to design a tall building in this location which avoids harming London’s heritage whilst at the same time providing public benefits through publicly accessible spaces. However, if only one objective is achievable, the NPPF identifies that greater weight should be given to conservation, especially to heritage of the greatest importance.</p> <p>In accordance with NPPF paragraph 202, any harm remaining after this process of refinement needs to be weighed against the public benefits of the proposals, as well as being assessed in the light of the City’s Eastern Cluster policy. Because the proposals in their current form cause harm to designated heritage assets of the highest significance, they do not appear to accord with the City of London’s Eastern Cluster policy, or the guidance set out in the LVMF. Historic England also question whether the claimed public benefits could demonstrate that there is clear and convincing justification for the harm. In that regard, and given the great weight attributed in the NPPF to conserving the significance of heritage assets, Historic England objects to the current proposal.</p> <p>Response to comments: Addressed in the Design and Heritage and Strategic Views sections of the report.</p>
<p>GLAAS, Historic England Archaeology</p>	<p>First consultation: <u>Assessment of Significance and Impact</u> The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [77190] City of London APA</p> <p>The planning application is accompanied by an Environmental Statement (Trium 2022) which includes a Technical Appendix for Archaeology prepared by MOLA (2022). The reports indicate that the site is located in an area of high archaeological potential and that previous archaeological work was carried out on the site prior to the construction of the current buildings in the 1980s. Archaeological remains identified on the site included features from the prehistoric and Roman periods. Little material from the medieval and post-medieval periods had survived on the site due to later truncation.</p> <p>The current development includes a lower ground floor, Basement Level 1 and Basement Level 2. It is clear from the desk-based work that the two basement levels will have completely truncated all archaeological material. The construction of the lower ground floor will also have removed the majority of archaeological remains, however a limited potential for survival of deeper cut features such as pits or wells remains.</p>

	<p><u>Planning Policies</u> NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.</p> <p>NPPF paragraphs 190 and 197 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.</p> <p>If you grant planning consent, paragraph 205 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.</p> <p><u>Recommendations</u> I advise that the development could cause harm to archaeological remains and field investigation is needed to determine appropriate mitigation. However, although the NPPF envisages investigation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider archaeological conditions could provide an acceptable safeguard. This would comprise firstly, monitoring of geotechnical investigations to clarify the nature and extent of surviving remains, followed, if necessary, by further investigation.</p> <p>I therefore recommend attaching conditions.</p> <p>Second consultation: Does not wish to make any further comments.</p> <p>Response to comments: Addressed in Archaeology section of report and conditions recommended.</p>
Historic Royal Palaces	The proposed development has no impact on the setting of the Tower of London World Heritage Site due to its occlusion by other existing or permitted developments and so we have no objection.
The Greater London Authority	<p><u>Strategic issues summary</u> Land use principles: The development of a large new office building in this part of the City of London is fully supported in land use terms, subject to further information as to how the</p>

	<p>development would meet the strategic aims of London Plan Policies E1 and E2 in terms of the flexibility, adaptability, and affordability of the commercial floor space.</p> <p>Tall building and strategic views: The proposals for a very tall building would have far reaching impacts on heritage assets and designated views that must be weighed in the planning balance with consideration given to the public benefits of the scheme.</p> <p>Urban design and public realm: Further design development is required to ensure the provision of high-quality public realm at street level. Heritage: Less than substantial harm to heritage assets is identified, which must be weighed against the public benefits of the proposal at the Mayor’s decision-making stage.</p> <p>Transport: Significant concerns are raised with regards to the transport strategy which requires urgent further consultation with Transport for London. This includes modelling, pedestrian and cycling impact on nearby junctions and wind mitigation/ Healthy Streets.</p> <p><u>Recommendation</u> That the City of London Corporation be advised that the application does not yet comply with the London Plan for the reasons set out. Possible remedies set out in this report could address these deficiencies.</p> <p>Response the comments: Addressed in the Principle of Tall Building, Strategic Views, Heritage, Urban Design and Public Realm and Highways sections of the report.</p>
Transport for London	<p>The following comments are made by Transport for London (TfL) officers on a ‘without prejudice’ basis only. You should not interpret them as an indication of any subsequent Mayoral decision on this planning application and these comments do not necessarily represent the views of the Greater London Authority (GLA).</p> <p><u>Site Access</u></p> <p>Vehicular: TfL note that the vehicular access subject to a Stage 1 Road Safety Audit (RSA). TfL received the designers’ response to RSA on 4th July 2023, TfL is preparing its highway authority response. The independent auditor picked up a key concern over the proximity of the access point to the signalised pedestrian crossing, which TfL believes can be addressed by creating a separation distance between the crossing and proposed access, as well as through restrictions on the operation of the access by limiting the number of vehicles, vehicle size, operating hours, management, and monitoring.</p> <p>Pedestrian: Pedestrian access is gained via various points across the site boundary with Bishopsgate and via the pedestrian route to Old Broad Street which is deemed acceptable.</p>

	<p>Cyclist: Cycling access will predominantly be via the proposed vehicle crossover, or users may dismount and walk with their bicycles. There is potential conflict between cyclists accessing and egressing the site, and pedestrians flows on the footway. This can be best mitigated through ensuring effective footway width and limiting footway clutter.</p> <p>Hostile Vehicle Mitigation (HVM): It is noted that there may be a requirement for HVM as part of the application. The applicant should be aware, and it should be noted that TfL will not accept HVM on the TfL footway given the level of pedestrian demand which exists and is forecast in the future. Taking account of the public realm adjacent to TfL highway, TfL would need to see Pedestrian Comfort Levels (PCLs) updated alongside any design development of HVM, this should form part of planning conditions. Also, the HVM design will need to consider not only wheelchair users, but also access for larger and adaptable bikes and cargo bikes.</p> <p><u>Cycle Parking and Access</u></p> <p>Short Stay: It is noted that the required minimum of short stay cycle parking to be London Plan compliant is 116 spaces, which the applicant is committed to providing in some form. However, the applicant is only proposing 8 Sheffield stands and 4 cargo bike spaces within the public realm. This equates to 20 spaces, which is 96 below the London Plan minimum requirement. It is acknowledged that the applicant and the City are keen to maximise public realm as much as possible below the building and are proposing to provide the short fall of the short stay cycle parking in the basement of the development. It is proposed that this would be accessed via the proposed lifts and stairs access and booked via an app. Whilst the effort of the applicant is appreciated, it should be noted that the existing short stay cycle parking surrounding the site experiences very high demand. Therefore, it is requested that the applicant should work with the relevant highway authority to identify potential sites within the vicinity if they do not propose to provide any additional spaces within the red line. As per the London Plan, this could be secured by the LPA via a financial contribution.</p> <p>Additionally, the proposed location of the lower ground floor short stay cycle parking does not comply with the London Cycle Design Standards (LCDS), nor do the proposals take into consideration people arriving last minute and being able to access the short stay parking. The proposal also lacks any clear legibility for people accessing the lower ground floor.</p> <p>Long Stay: TfL consider the provision of long stay cycle parking acceptable, complying with the London Plan 2021 minimum requirements. Access to the cycle parking will be via fob. The layout does not appear to be LCDS compliant.</p>
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	<p>Cycle Access: Cycle access is gained from Bishopsgate and the alleyway directly adjacent to the site. It is noted that the site will not allow cycling and people will need to get off their bicycle, likely on street. It is noted that at peak times there is potential for collisions given the number of cyclists and pedestrians passing the site. The applicant should demonstrate that they have taken this into consideration in their design.</p> <p>Cycle Lift and Wheeling Ramps: The additional information on the lifts and wheeling ramps is welcomed. TfL still have concerns over the functional capability and capacity of the two lifts but note the principal route to the cycle parking will be via the stairs/ramps. It is also noted that the applicant is willing to provide additional automated ramp facilities which is welcomed.</p> <p>Wayfinding: The applicant has committed to providing a cycling wayfinding strategy, which is welcomed and should be secured via condition.</p> <p>Access Control: Access to the cycle parking would be through an app for a smart phone. TfL consider this acceptable but don't necessarily consider this the easiest method of entry for irregular users of the site who wish to access the short stay cycle parking.</p> <p>Cycle Hire: TfL welcome the commitment of the applicant to provide reasonable and proportionate contributions to local improvement schemes. The applicant should be made aware that the usage of the closest docking station, Wormwood Street, is regularly in the top 10 of all cycle hire stations in London. Subsequently, this development will add additional pressure to this dock and therefore mitigation is required. The mitigation would be in the form of a new cycle hire docking station, with the cost being £220k, which will be secured via S106 agreement. The contribution will allow the construction of a medium sized dock and also covers 3 years of operating costs. Following this, TfL take on the financial risk. Regarding location, TfL accept the requirement for the proposed dock to be within the vicinity of the site and will work with the City to find a suitable location. TfL also has information on the origin and destination of users of Wormwood Street docking station which demonstrates the type of user. The data highlights that 10 times the amount of hires come from the Waterloo Station dock in comparison to the second place origin location.</p> <p>Cycling Promotion Plan (CPP): The provision of the CPP is welcomed. TfL would also encourage the applicant to use innovate measures of monitoring cycle parking demand and they should consider providing cycle hire corporate memberships.</p> <p>Pedestrian Crossing</p>
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	<p>TfL note that the applicant has considered various options for the relocation of the existing pedestrian crossing and the applicant has considered the existing location as being most appropriate. However, the proximity of the crossing to the proposed new access point is subject to the RSA which identifies this as potential safety concern.</p> <p>The RSA indicates that the location of the access next to the crossing would increase danger, but TfL understand there are constraints to relocating the crossing. However, we accept the audit recommendation that this is a safety concern that needs to be mitigated through design changes and potentially moving the crossing.</p> <p>Guidance on separation distance between private vehicle crossovers and pedestrian crossings is open to interpretation on whether you should measure from the stopline or from the zig-zags, published guidance on this varies across local authorities and mainly relates to relatively low use crossovers.</p> <p>TfL advice in this case is that there should be a 10-metre offset from the stopline/ signal head position to the point where vehicles can cross the footway. In the detailed design stage (RSA Stage 2) we can also take account of any measures agreed that would limit how the cross over actually works. Therefore, the scope of the highways works on the TLRN should include potential changes to the pedestrian crossing, as well changes to the kerb and upgrades to the footway to ensure quality of finish that ties in with the public realm finishes on site. We understand the City has preference for footway material that may differ from TfL Streetscape Guidance, the cost of these works including any commuted maintenance should be funded by the developer. TfL recommends that details of delivery and servicing arrangements and management are confirmed in parallel and in coordination with detailed design of the access.</p> <p><u>Car Parking and Blue Badge</u></p> <p>The proposal is car free apart from blue badge spaces. The applicant is currently proposing 2 blue badge spaces in the basement which would be accessed via service lifts. The location of the spaces has been relocated within the basement to reduce conflict with delivery and servicing vehicles.</p> <p>Access to the spaces will be via pre-booking and gaining access across the public realm. This will also require a robust site management plan which should be secured by condition. In addition to this, the applicant should highlight surrounding provision of blue badge spaces or scope for any additional spaces.</p> <p><u>Vehicular Access and Stage 1 RSA</u></p> <p>Proposed Crossover:</p> <p>As indicated above, the proposal to relocate the existing vehicle crossover has been subject to Stage 1 RSA. The works should be secured by condition and cost of works covered by the developer under Section 278 of the Highways Act 1980, and</p>
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concerns raised in the Stage 1 RSA addressed as part of the Stage 2 RSA. The scope of the works should allow for the cross over works themselves, footway renewal along the site frontage, resurfacing of the carriageway where necessary, and works to the signalised pedestrian crossing. Depending on the detail, relocation of the crossing may require traffic modelling as part of the detailed design including assessing the PCL of the crossing.

Ground Floor Layout:

TfL observe that the ground floor will operate in two modes, with use by pedestrians and cyclists during the daytime, and at night as a space for delivery vehicles. In the former, there is likely to be some delivery activity. When used at night for deliveries we still expect a low level of pedestrian activity. Therefore, before TfL could finalise the detail of the access onto TLRN, we need assurance on the detail of the ground floor layout, confirmation of management of the public realm and delivery space. We expect the Road Safety Auditor to receive in their brief a summary of these arrangements.

Whilst the TA assumes most office activity will occur during the day, TfL expect there will be activity during the night relating to deliveries, building cleaning, security and maintenance, so there will be movement of people at night. Also, occupiers may want to operate their business overnight. Therefore, it is important to consider access by bus users, cyclists and pedestrians as part of the plans, though actual volumes are likely to be low. TfL did ask for night-time ATZ to inform this aspect of safety at night, particularly women's safety in accord with Women's Night Safety Charter, this hasn't been undertaken as yet, could part of future analysis and design work on and off site.

Delivery and Servicing

The application site is located on the A10 Bishopsgate, which forms part of the Transport for London Road Network (TLRN). It is noted that this location forms an incredibly important part of the network for pedestrians and road users. Therefore, it is incredibly important that the applicant gets the delivery and servicing right. TfL have provided the LPA examples of good practices in similar circumstances.

Failure to get the delivery and servicing for this building correct, has a potential to cause significant impact to pedestrians, cyclists, buses and other road users. Subsequently, TfL, the City and the applicant need to apply relevant mechanisms to restrict this.

Servicing Hours:

The applicant is proposing to service the site from 10pm-7am via the vehicle lifts. The applicant has carried out detailed analysis which suggests that based upon other sites and surveys, this 9-hour period is feasible to accommodate demand. The proposed time restrictions should be secured via condition, with the wording being in consultation with TfL.

Option to Extend Servicing Hours:

	<p>The applicant is seeking the option of having the flexibility of servicing hours to reflect less busy times with the City. Any proposed amendments to servicing times should be agreed in consultation with TfL and this should be highlighted in the DSP.</p> <p>Operations and Contingency Measures (Lift Failure): TfL have expressed concerns over contingency measures for the delivery and servicing of the site.</p> <p>The key concern is over the potential failure of one or more of the servicing lifts. Whilst it is appreciated that there are a number of servicing lifts such as this permitted in London, the applicant has failed to provide a visit to working examples to allay concerns. The biggest concern is if the lift was to fail during operational hours and the impact this may have on the servicing, public realm, and the network within and surrounding the site. Whilst it is noted that there are two lifts, which in turn does build limited resilience, the applicant has provided limited evidence, through documents from the lift manufacturer explaining the lifts and the mechanisms of maintenance on the lifts.</p> <p>It is also noted TfL have raised no objections to lifts located in other locations throughout London. However, it is considered that this is the only one which is accessed directly from the TLRN and such a busy pedestrian footway.</p> <p>Another concern is the proposed impact of the servicing lift on the usability and quality of this particular section of the public realm. Clarity was sought on whether there would be barriers surrounding the lift as shown on the proposals. Additionally, there was concern that the public realm released as part of the installation of the lift would be poor quality, meaning that the space would effectively be un-usable or feel inadequate by foot, bicycle or wheelchair.</p> <p>TfL also have concerns over the operational management of the site/ public realm. The management of vehicles accessing the site is crucial for pedestrian and cyclist safety in this location. Further discussion and agreement is needed over the management through the DSP.</p> <p>Whilst it is noted that the applicant is proposing retain the on-street bay which existed prior to the footways being extended as a result of Covid, TfL would not support the reinstatement of this bay due to potential impact on the operation and safety of Bishopsgate. Any vehicles seeking to use the bay would be required to access the site from the north along Bishopsgate and turn around mid-highway which would then cause a significant safety issue and would not be supported.</p> <p>It is accepted that given the potential type of land uses, the occupier may rely upon on the day deliveries for perishable goods.</p> <p>The following solutions/ restrictions are requested:</p> <ul style="list-style-type: none"> • A robust delivery and servicing plan which restricts the number vehicles accessing the site with a time restriction of 10pm-7am.
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	<p>TfL accept the potential of reviewing this in time, but any changes should be subject to agreement with TfL.</p> <ul style="list-style-type: none"> • The applicant should agree to freight consolidation for delivery and servicing of the site and demonstrate how this would work. • The applicant should sign up to a Delivery and Servicing Plan Contribution which would secure a payment which would be triggered and paid to TfL if the applicant fails to adhere to the DSP vehicle numbers agreed. The payment would solely be for walking and cycling improvement schemes in the City and would fall away after 10 years. This would require a camera being installed to monitor the restriction which should also be paid for by the applicant. • Detailed scenario plans as part of the DSP which show that vehicles can be accommodated on site whilst being able to enter and egress the site in forward gear. • The DSP should also highlight potential hold locations for delivery and servicing vehicles. 8. <p><u>Demolition and Construction Impact</u></p> <p>There is concern over the expected impact of the demolition and construction phases. It is therefore requested that the applicant should agree to the below construction principles.</p> <ul style="list-style-type: none"> • To maintain minimum 3.25m running lane in each direction on A10 Bishopsgate • To maintain a pedestrian route on the northern footway, minimum 2m width, minimum Pedestrian Comfort Level of B. • To maintain existing signalised pedestrian crossing, its safe operation and access. • To minimise traffic management layout changes throughout demolition/construction programme • To undertake an RSA for each layout in place for longer than 6 months and comply with its recommendations in accordance with TfL's safety advice. • If a pitlane is installed on the footway (as proposed), a s278 agreement will be required for the enabling works to strengthen the footway so it can take vehicle loading. • Cycle level of service on the A10 should be maintained through each demolition and construction stage. • <p>Cycle parking and end of journey facilities should be provided for construction workers.</p> <ul style="list-style-type: none"> • Electric vehicles should be used for on site machinery, and where possible for other vehicles on site. All vehicles to site should comply with ULEZ emission standards. • Direct Vision Standard 5, as this is a primary cycle route, and Gold or Silver membership of FORS. • Suitable qualified Traffic Marshals should manage access to site at all stages of demolition and construction, • All construction logistics involving A10 Bishopsgate require TfL's approval alongside consulting the City=. The detailed CLP will need to be based on detailed estimates of vehicle trips.
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	<ul style="list-style-type: none"> • All aspects of demolition and construction should be prepared in accordance with the latest TfL guidance and relevant City guidance. <p>Additionally, it is also noted that in the CEMP the document refers to getting a dispensation from the Bishopsgate restrictions, this would likely need further discussion.</p> <p>TfL recommends that the principles are included in the demolition and construction documents. We hope that this scheme would have exemplary demolition and construction logistics planning given its location and size. TfL are happy to assist the applicant in this process.</p> <p><u>Transport Modelling</u></p> <p>As highlighted in the GLA Stage 1 comments, the applicant has failed to carry out sufficient transport modelling in accordance with TfL guidance. TfL advice for a scheme of this scale that this modelling should be undertaken before the application is determine. In relation to works directly required on TfL network, this would be subject to Section 278 agreement with TfL, TfL is likely to require modelling before the works are agreed on TfL network. As the construction phase is of significant duration, TfL will require modelling to assess the impact of construction phase, TfL advice is to agree this modelling at an early stage, well in advance of commencement.</p> <p><u>Strategic Transport Mitigation</u></p> <p><u>Cycle Hire Docking Station:</u></p> <p>A financial contribution of £220k is to be paid TfL and associated land within the vicinity of the site. The existing docking stations within the vicinity of the site are extremely well used and a development of this size will only exacerbate demand further. The contribution will cover the build cost of the site and 3 years operation of the site. It is encouraged that this site would be operation prior to first occupation.</p> <p><u>Legible London:</u></p> <p>As part of a wayfinding strategy TfL request that the applicant should provide a contribution to the City of London for new and updated Legible London signage within the site and in the surrounding locations, exact amount to be agreed with the City.</p> <p><u>A10 Highway Improvements (including junction safety improvements):</u></p> <p>During the discussions with the applicant and the City, TfL Spatial Planning have raised concerns over the additional impact that pedestrians and cyclists from this development will cause on the surrounding network. Whilst the impact has yet to be fully confirmed, there would be an uplift in users in the area which are likely to be arriving via public transport or cycling. This proposal will therefore put additional impact on the footways particularly between key transport nodes.</p> <p>TfL request that the applicant should provide a financial contribution of £1.5million which will cover the below scope, stretching from the corner of Threadneedle Street to the south, to</p>
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	<p>Liverpool Street in the north. The scope of works would likely include the following:</p> <ul style="list-style-type: none"> • Junction safety improvements • Improving safety and security at night, as well designs to reduce fear of crime. • Footways widened and construction in permanent materials (to match existing, permanent footways) • Movement of any street furniture (including traffic signal infrastructure) to reflect the new kerb lines • Loading bay or other cross overs resurfaced to reflect new kerblines • Resurfacing of carriageway to reflect new kerblines and ensure drainage is correct • Widening and relocation of existing crossings (where necessary) <p>The contribution is based upon the estimates which TfL currently have for similar schemes whilst also reflecting the location of the proposal. It should be noted that dependent upon the outcome of the experimental traffic order on Bishopsgate, this requested funding will contribute to a proportionate amount if that comes to fruition.</p> <p>A financial contribution of £1.5million is reasonable, proportionate, and related to this development to make it acceptable in planning terms. Unfortunately, the applicant has failed to assess their own impact on the footway in an agreeable manner with TfL. It should also be noted that under TfL have evidence which shows expected pedestrian comfort levels at Wormwood pedestrian Junction are likely to be at a scale of E, on a scale of A being the best and F being the worst. This report does not take into consideration this proposal at this stage.</p> <p>Delivery and Servicing Restriction:</p> <p>If it is decided by TfL that we accept the location of the delivery and service access point from Bishopsgate, which is still subject to road safety concerns, TfL still hold concerns over the operational aspect of the proposed vehicle lifts. Whilst it is acknowledged that similar vehicle lifts have been accepted in other locations, none have the potential significant impact on the TLRN such as this.</p> <p>Given the size, scale and surrounding context of the site, it is requested that the applicant agrees to providing an agreed Delivery and Servicing restriction which restricts the number and times of access for delivery and servicing vehicles. This has been used in a number of locations in London, including Bishopsgate Goods Yard, Elizabeth House and the Edge, London Bridge. The financial payment would be held by relevant authority and if the restriction was broken then this would contribute to walking and cycling improvements within the area. The proposed monitoring of this would take place through the installation of cameras which would also help monitor and enforce the double red line restrictions. The suggested fee for the DSP contribution</p>
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	<p>restriction would need to be agreed with associated monitoring fee.</p> <p>It is noted that this is likely to be the first example of this being used with the City. However, TfL deem this as being reasonable so that the delivery and servicing restrictions police themselves. This is the only significant tall building, with this type of potential impact on the TLRN.</p> <p><u>Section 278</u></p> <p>In addition to the s106 contributions, there also needs to be a requirement to enter into a s278 agreement. The s278 works are likely to include: closure of existing servicing access, provision of new servicing access, footway renewal along site frontage, and potential relocation of the pedestrian crossing. The applicant is also likely to require a s278 agreement for temporary s278 works to facilitate construction.</p> <p>Response to comments: Addressed in the Highways section report, conditions and S106 Heads of Terms.</p>
<p>Twentieth Century Society</p>	<p>First consultation:</p> <p>The Society objects to the planning application on heritage grounds. For the reasons outlined above, the Society considers 55 Bishopsgate to have heritage significance and townscape merit and should be at least recognised as a Non-Designated Heritage Asset (NDHA). It is also our view that 55 makes a positive contribution to the setting of the Grade II listed Mewes & Davies building opposite (nos.52-68).</p> <p>In weighing applications that directly affect NDHAs, paragraph 203 of the NPPF states that “a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”. The scale of harm here would be the total loss of an NDHA of significance. We understand that the building is structurally sound and could be adapted for reuse and therefore do not consider its total demolition to be justified.</p> <p>The total demolition of the responsive and complementary 55 Bishopsgate and its replacement with a -63 storey office block would result in harm to the setting of Mewes and Davies’ Hudson Bay House. Nearby tall buildings do not justify this encroaching development: paragraph 9 of Historic England’s ‘The Setting of Heritage Assets’ (Good Practice Advice in Planning Note 3, 2nd Edition 2017) states that “Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting [...] consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset.”</p> <p>Second consultation:</p>

	<p>The Society maintains its strong objection to the demolition of 55 Bishopsgate. We strongly disagree with Montagu Evans’s assessment of the building’s quality and contribution to the streetscene, presented in the ES HTVIA Addendum (June 2023). No. 55 is a considered design with high-quality finishes and detailing and it makes a very positive addition to Bishopsgate. We maintain that the building should be considered an NHDA, and we continue to believe that it positively contributes to the setting of Mewes & Davis’ Grade II 1920s Hudson Bay House opposite (nos.52-68). As <i>Architecture Today</i> declared in 1992, “It succeeds as cityscape and has a quality [...] and robustness that should outlast fashion” (<i>Architecture Today</i>, 1992).</p> <p>Response to comments: Addressed in the Design and Heritage section of the report relating to Non- designated Heritage Assets</p>
<p>Surveyor to the Fabric of St Paul’s Cathedral</p>	<p>First consultation: There is an extensive heritage, townscape, and visual impact assessment as part of this application. However, we differ on the conclusions reached by the applicant with regards to impact on the Cathedral, in terms of method, identification and evaluation of harm.</p> <p>Our key concerns are over the heritage harm to the Cathedral arising from the visual impact of the proposed tall building. Co-visibility between the Cathedral and the proposed development is most prominent in views from the southwest (specifically townscape views 15B.1 and B.2 as identified in the LVMF). Views would also be permitted from the river itself and from views 14A.1, 16B.2, and 17B.2. Further kinetic views, not explicitly identified by the LVMF but nonetheless important to an understanding of the significance of the Grade I listed building, would also be affected. Chapter does not elect to comment on impacts outside the locus of the Cathedral, but other regulators or commentators will note the analysis of the views as seen from St James’ Park.</p> <p>We acknowledge the dynamic, evolving nature of the City of London. We also note the existing character of the setting of the Cathedral, which already includes a number of tall buildings. However, in our view, due to its height, massing, and location, the proposed development would unduly increase the prominence of the eastern cluster of tall buildings in comparison to and weighting the cluster much more closely to the Cathedral. This would materially detract from the townscape and heritage value of St Paul’s as a prominent historic landmark, altering the balance of visual prominence between the Grade I listed building and the tall buildings cluster beyond.</p>

Views

Views 15B.1 and 2 are located on Westminster Bridge, with 15B.1 being close to the Westminster bank and 15B.2 being around halfway across the length of the bridge itself. While the proposals have the potential to affect the Cathedral in additional views (notably 14A.1, 16B.2, and 17B.2 of the LVMF), impacts would be most prominent in those referenced above. For a proportional approach to assessment, it is these 15B/1 and 15B.2 that are the focus of discussion below.

These viewpoints allow for sweeping views towards St Paul's Cathedral and the Eastern Tall Buildings Cluster within the City of London. There is a distinct fore, middle and background to these views which help frame the Cathedral as an important landmark. The Cathedral is a central focus of these views, which City and London authorities have long recognised as of the highest significance and of an essential value for the identity of London in the world. The foreground of these views is formed by the dynamic form of the river and the vessels that ply it. To 15B.1 the middle ground is formed by the soft edge of trees along the embankment, and further away the buildings, generally of a lower height, to the south of the Cathedral. 15B.2 is located further south and provides a less oblique view, revealing more of the buildings along the waterfront. However, encroachments of the St Paul's Heights policy and the sometimes imprecise interpretation of the LVMF policies for other development more widely, cumulatively, erode the visual prominence and townscape qualities of the Cathedral.

Of specific note to this assessment is the composition of these views and the relationship between the Cathedral and the tall buildings cluster to the east. Currently rising up to a peak at 22 Bishopsgate (though the tallest building in the cluster will be One Undershaft), in both views the tall buildings cluster is separated from the Cathedral by a (now eroded and eroded) 'skygap'. While there are some variances within the cluster (such as the "cluster within a cluster" (formed by the Heron Tower and those surrounding it) development gradually rises to a "peak" away from the Cathedral. Within these views, St Paul's acts as a central visual counterpoint to the massing of the tall buildings cluster beyond, reflecting its historic landmark status. This is especially relevant in 15B.2, where the breadth of the cluster is more apparent.

Heritage Significance

In terms of the significance of the Cathedral, the views identified allow for an understanding of the exceptional architectural and historic special interest of the Grade I listed building in a number of ways. Indeed, these views are the basis of a number of historic depictions of the Cathedral, most famously in artwork by

Canaletto (c 1747-8). From Waterloo Bridge, the iconic silhouette of the Cathedral, including the dome, lantern and west towers, is appreciable. Also appreciable are features of architectural interest of the building, including the rhythm and detail of the columns of the peristyle and the distinctive forms of the west towers. Even from some distance, the silhouette of the parapet statues remains evident and legible against sky – accentuating the value of this sculptural gallery of ‘Saints and Apostles’. The distinctive silhouette of the Cathedral, rising above the buildings that surround it, corresponds directly to Wren’s design intent and is historically how the building would have been understood. This characteristic therefore strongly contributes to the historic interest of the listed building. While an established part of the setting of the Cathedral, the eastern tall buildings cluster has steadily grown to visually dominate the backdrop of the Grade I listed building. In some cases, the City and other adjoining boroughs have approved buildings which erode its visual prominence and historic interest, with permanent and irreversible detriment.

Impacts

The proposals now under consideration for No 55 Bishopsgate would introduce a new tall building to these identified protected views and vistas, with the resulting visual and heritage impacts most apparent from 15B.1 and 15B.2. LVMF guidance states that “Development proposals must show how they contribute to the settings of spaces and buildings immediately fronting the river, including the Strategically Important Landmark of St Paul’s Cathedral.” (para. 262) and “New tall buildings should seek to complement the City’s eastern cluster of tall buildings with buildings of a height appropriate to their site and of high architectural design quality” (para. 263).

It is considered that the proposals, especially when viewed cumulatively with future (but already consented) development in the cluster, would be contrary to this guidance. The proposals would, through their height and massing, increase the visual prominence and dominance of the cluster. This would negatively affect the characteristics of these views, shifting the “gravity” of the cluster towards the Cathedral, challenging its visual prominence and identity as a Strategically Important Landmark. The proposals would therefore cause an alteration to the setting of the Cathedral that is also explicitly contrary to the position outlined in the City of London’s Protected Views Supplementary Planning Document (2012). As noted within this document, the proposals do not lie within the St Paul’s Heights Policy Area but are protected as part of the backdrop to the Cathedral through Core Strategic Policy CS13 (Protected Views) and CS14 (Tall Buildings) of the City of London adopted Local Plan 2015. Paragraph 2.20 of the SPD states “The height and massing of buildings in the cluster step upwards from this gap. This is important to the visual relationship between the Cathedral and

the cluster, and so should be maintained”. In shifting the “gravity” of development within the Cluster the proposals would fundamentally alter the balance between the Cathedral and the tall buildings beyond.

In terms of the significance of the building, this would affect key, historic views of the listed building that contribute to its architectural and historic interest. As noted above, the proposals would increase the prominence of the cluster and further visually challenge St Paul’s landmark status, from which it derives much of its heritage significance.

In terms of the NPPF, we conclude that the proposals would cause harm to the Cathedral listed building through alteration to its setting. We note that this view is shared by Historic England, as recorded in Volume 2 of the applicant’s Environmental Statement and through recent commentary dated 29th November 2022.

The proposals would affect and harm an appreciation of a Grade I listed building of international importance. Paragraph 199 of the NPPF states that the more important the heritage asset, the greater weight its conservation should be given within the decision making process. The outstanding significance of the Cathedral should therefore be considered as part of the overall planning balance. There is also a wider concern and consideration – one for the City to reflect on carefully especially – about both the policy-led aims for the City cluster – which have also long been expressed in urban design terms, which have sought to define an ‘idea’ for the identity and shape of the City cluster of tall buildings. This proposal falls outside the boundaries of what was expressed as the intended ‘centre’ of the cluster. St Paul’s and planning committee members will - more than once - have heard applicants and officers describing the main tallest (300m+) towers as ‘the last central tall building of the cluster’: and now we have a new application for a very tall building (284.68m) which tries to stretch and change the central form and focus of many years of planning strategy. Does the City want to always accede to proposals that push outside the boundaries – and thus undermine their own approach? There is actually a public good in finally saying ‘no’ - and thus helping the development community and your planning officers hold to a line and deliver high quality planning for the benefit of London, with greater certainty and the benefit of shared, defended values.

Conclusions

We have assessed that the emerging proposals have the potential to cause harm to the significance of the Grade I listed Cathedral. This harm affects a heritage asset of the highest significance and national importance. As we argue here, and also

in other similar planning matters, any harm to the setting is unacceptable. We suggest that all those involved in the development of a dynamic, vibrant City (including the applicant) should, in our view, be strenuously working to safeguard the public benefit of the reading and understanding of the heritage of the City.

Our view is that the relationship between the City and St Paul's is a very special case – over and above the technocratic readings of the NPPF. In line with the NPPF, it is essential that any impact is justified. We would note that the Cathedral was consulted by the applicant during the design evolution of the scheme. At this time, we expressed reservations over the impact of the height and massing of proposals on the heritage values of the Cathedral. While we always welcome consultation during the development of such a scheme, we would note that concerns raised during these meetings have led to no meaningful changes to the submission proposals.

The Regulator has to take a view on benefits and weight these against harms. As we have remarked in other context, there are a number of considerations to this weighing exercise which should be borne in mind. Firstly, the economic 'benefits' of development (which are sometimes tangible and can be calculated) have to be compared to intangible dis benefits. No one can readily calculate the detrimental externality and effect of the actual, real erosion of heritage values, which is something that diminishes the common experience of our Capital City for all Londoners and visitors. Chapter is acutely aware that it has to raise its voice to alert the regulator to these concerns, not in its own interest but for the enduring and eternal values of the City, in which St Paul's plays an important, central role in our common cultural identity.

We also urge the City planners to give considerable weight in your evaluation to the protection of your own policies – which themselves are of considerable value and need to be safeguarded. The St Paul's Heights, the Views SPD and the LVMF view protection policies are themselves of great public worth and public interest. The positive effect and benefit to the public of these polices is considerable and significant. The converse then is, if the regulator allows these policies to be gradually 'salami-sliced' and eroded incrementally, the special common value of the policies themselves is diminished. This diminution harms the common good. We have also identified a concern – which is for Planning Committee to judge – for defending your own planning approach, which over many years has clearly expressed the focus and form of the City cluster of tall buildings. This proposal falls outside the boundaries. If approved in its current form, we suggest your own policies and design

approach will suffer detriment and reduce confidence and certainty in the planning process.

We would strongly urge that the planning process is halted, and would encourage liaison with the Cathedral and other stakeholders to explore further options to limit the potential heritage impact of the proposals. The Cathedral is supportive of carefully considered, well designed development within the City of London, as alteration of the setting of the Cathedral does not have to equate to heritage harm. We would therefore hope that there is a meaningful compromise to be made with regards to the design of the scheme.

We hope that this is a consultation response which strengthens the relationships and common aims of City and the developers.

Second consultation:

We welcome that time has been taken to reconsider the scheme, in dialogue with Officers at the City. However, as the massing and height of the proposals remains the same, our previously expressed concerns still stand. It is evident that this application has been rushed and submitted prematurely. The need to undertake major design changes which have been submitted indicates this weakness. Nevertheless, we must express our significant disappointment that the applicant clearly has in their power to make changes to the design, but does not consider the merits of removing harm to St Paul's as worthy of consideration. We still feel that these issues should be given great weight in the decision making process, as NPPF and City planning policy demands.

Many of the revisions to the scheme lie outside the locus of comment of St Paul's, relating closely to the ground floor offering, landscaping, and detail design in these areas. It remains for Officers to decide on the weight of their public benefit. Our view is that, whilst there are merits that one can discern in relation to the 'Destination City' agenda, these are not benefits that can be objectively shown to offset the harm to the City skyline and thus the setting and significance of St Paul's by any proportionate weighting exercise.

The revised scheme also includes an updated cultural offering as part of a drive towards delivering a cultural benefit. As an active participant in the City's cultural landscape, it is within our scope to provide comment on this element. We are mindful of rejuvenating the vibrancy of the Square Mile's cultural offering, and are aware of the 'Destination City' initiative that seeks to reinvigorate aspects of the City.

	<p>While public benefits are of course an important driver to all development, we would also urge caution with regard to ensuring the longevity of any proposed cultural offering – and the real weight of its public benefit and long term social value it would deliver. This is not to denigrate the work undertaken by the applicant as part of their Cultural Plan, but to ensure that the wording of any approval and S106 agreement ensures it is deliverable for the entire lifetime of the development. We would seek assurances that the proposed cultural programme is achievable, measurable and quantifiable, actively monitored, and long lived. It lies with Officers to secure this as part of the planning process. Unfortunately, too often cultural programming is used to promote the benefits of a scheme, whilst it eventually is diluted, or at worst, undeliverable. The Cultural Plan appears to aspire to deliver space and a relationship for programming in support of NLA in the long-term, but is quiet on the detail of funding for that programme into the future. We understand that NLA are the cultural partner currently identified by the applicant, but the plan also lacks detail on how a similar level of cultural benefit would be delivered in future if the arrangement with NLA proves un-sustainable or breaks down.</p> <p>This short response seeks to reiterate our previous standpoint – the Cathedral still harbours concerns over the height and massing of the proposals and the effect this will have on St Paul’s. We again would note the weight that this should be given in decision making. We do not recognise the proposed changes as in any way satisfactorily addressing these concerns. However, we also seek to engage constructively with the planning process and understand that we play an active role in the cultural landscape of the City. Our aims, the aims of the Corporation, and the ultimate aims of the cultural programming within this application are the same, to ensure the City is a thriving place to live, work, and visit. If the applicant or their proposed operators would like to engage further with St Paul’s on common themes of interpretation and outreach to enrich the visitor experience, we will be glad to hear more.</p> <p>Response to comments: An officer assessment of the points raised and consideration of the impacts identified in the Historic England response are contained in the following sections of this report: Design and Heritage, Principle of a Tall Building, Tall Building – Impacts, Strategic Views and Planning balance</p>
Thames Water	<p><u>Waste Comments</u> As per Building regulations part H paragraph 2.21, Drainage serving kitchens in commercial hot food premises should be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825-2:2002 or other effective means of grease removal. Thames Water further</p>

recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses.

A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc may be required before the Company can give its consent.

As you are redeveloping a site, there may be public sewers crossing or close to your development. If you discover a sewer, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

The proposed development is located within 15 metres of our underground waste water assets and as such we would like the following informative attached to any approval granted. "The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a

position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

Supplementary Comments

Thames Water have assessed and responded to the planning application based on the information provided to date. Should the development proposal change, Thames Water would need to re-assess the application and review the comments accordingly.

	<p>Should surface or foul water discharge locations change, or a decision is made to use multiple outfalls, Thames Water request details of sqm split for each outfall location along with revised flow rates for each.</p> <p>When connecting to a trunk sewer, please note that this must be a pre-existing connection confirmed in advance via CCTV of on site drainage to confirm connectivity.</p> <p>Response to comments: Conditions are recommended.</p>
Environment Agency	<p><u>Water Resources</u></p> <p>Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.</p> <p>We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.</p>
Natural England	<p>First consultation: No objection</p> <p>Second consultation: No further comments</p>
London City Airport	<p>Second consultation: Conditions recommended relating to cranes and obstacle lights.</p>
Heathrow Airport	<p>Conditions requested related to cranes and obstacle lighting.</p> <p>Response to comments: Conditions are recommended.</p>
National Air Traffic Services (NATS)	<p>First consultation:</p> <p>We refer to the consultation for 22/00981/FULEIA. Having assessed the application, NATS can confirm that it anticipates a detrimental impact on its H10 radar, located at Heathrow airport from the proposal. The scale, orientation and line of sight to the site in question is anticipated to degrade NATS's radar infrastructure through reflecting the signal and causing false aircraft targets. These have an impact on air traffic controllers' workload and therefore can affect the safety of NATS's operations. NATS has been engaged with the Applicant in</p>

	<p>respect of the mitigation measures available and negotiations are ongoing in terms of the contractual agreement and funding required to secure these. NATS and the Applicant are continuing to discuss the matter but are in agreement in respect of the need for mitigation and have jointly agreed the wording of suitable planning conditions.</p> <p>As such, should the Planning Authority be minded to consent the scheme, NATS respectfully requests the imposition of conditions, required to ensure its operations remain unaffected.</p> <p>Second consultation:</p> <p>NATS response remains as above.</p> <p>Response to comments: Conditions are recommended.</p>
London Borough of Tower Hamlets	Have confirmed that they do not wish to comment on the application.
City of Westminster	<p>First consultation: The proposal will have a harmful impact upon the setting of designated heritage assets within Westminster, will be harmful to our historic townscape and harmful to sensitive views, including views identified within the London View Management Framework.</p> <p>Impact from St James's Park: The Blue Bridge View 8, 9.1, 9.2 and 9.3 of the HTVIA includes LVMF View 26A.1 and other views from the Blue Bridge. Contend that the impact of the proposal would not adhere to this guidance and as such the application should be refused.</p> <p>Impact from Jubilee Footbridges View 11 of the HTVIA is LVMF view 17B.1 from the Golden Jubilee / Hungerford Footbridges looking downstream with St Paul's (a Strategically Important Landmark) in the centre of the view. The management guidance within the LVMF states that the setting of St Paul's as the singular most important structure in this view should be preserved or enhanced; and that new development should strengthen the composition of the existing clusters of tall buildings. We contend that the current proposal achieves neither of these objectives.</p> <p>Impact from Waterloo Bridge View 13 of the HTVIA is LVMF view 15B.1. The proposal will introduce a more abrupt interface between the city cluster and the lower rise skyline to the right of St Paul's. Contend that the proposal does not accord with the LVMF guidance and that a lower building, maintaining a</p>

	<p>smoother height transition towards 22 Bishopsgate, should be considered.</p> <p>Impact from Somerset House Terrace View C12 of the HTVIA is view 22 within our draft Metropolitan Views SPD. The dome of St Paul's is visible in this view and is described in our draft SPD as the focal point of the view. Contend that the height of the new building diminishes further the primacy of the dome within this view and is harmful to the townscape.</p> <p>WCC suggest the proposals would fail to adequately accord with policy HC4 of London Plan; Policy 40 F of Westminster's City Plan 2019-2040; and policies CS13 and CS14 of the City of London Local Plan 2015</p> <p>Second consultation: Further to our previous comments, we wish to reiterate our objection to this proposal and expand upon and clarify the reasons for our objection. We believe the proposal will have a harmful impact upon the setting of designated heritage assets within Westminster, will be harmful to our historic townscape and harmful to sensitive views, including views identified within the London View Management Framework.</p> <p>Impact from St James's Park: The Blue Bridge View 8, 9.1, 9.2 and 9.3 of the HTVIA includes LVMF View 26A.1 and other views from the Blue Bridge. The densely treed Duck Island is in the centre of the view and to the left is the "skyline of spires and pinnacles" of Horse Guards, the Old War Office and Whitehall Court (grade I and II* listed buildings). It is described as a picturesque view within the LVMF. The proposed new development will rise prominently in the background behind the aforementioned skyline of spires and pinnacles and to the left of the trees of Duck Island. In summer, in winter and at night the proposal will harmfully erode the skyline and the picturesque qualities of the view. Of the tall buildings within the city cluster, from this view it will be an outlier and project above the tree line in a way and to a degree which others in the cluster do not. The LVMF in its view management guidance, when discussing background development for this view states that "New buildings should appear as part of the existing groups of buildings; buildings that appear above the central part of Duck Island would damage the viewer's ability to see these groups of buildings in conjunction with the landscaped foreground and should be refused." We contend that the impact of the proposal would not adhere to this guidance and as such the application should be refused. THE HTVIA describes the impact as 'Moderate Neutral', which in our view is a nonsense. We would suggest introducing different levels of neutral impact is illogical and that in this case the impact is clearly not neutral.</p>
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Impact from Jubilee Footbridges:

View 11 of the HTVIA is LVMF view 17B.1 from the Golden Jubilee / Hungerford Footbridges looking downstream with St Paul's (a Strategically Important Landmark) in the centre of the view. The existing city cluster of tall buildings lies to the right of St Paul's in this view. The proposal, while sitting amongst the cluster brings a taller component to the left edge of the cluster in this view and thus introduces a more abrupt change in scale adjacent to the lower skyline either side of St Paul's. This is considered to be harmful to the townscape and to the setting of St Paul's as appreciated in this view. The height of the proposed new building ought to be reduced so that the transition and shape of the cluster rises more evenly in height towards 22 Bishopsgate, thus avoiding the abrupt change in scale that is introduced by the current proposal. The management guidance within the LVMF states that the setting of St Paul's as the singular most important structure in this view should be preserved or enhanced; and that new development should strengthen the composition of the existing clusters of tall buildings. We contend that the current proposal achieves neither of these objectives.

Impact from Waterloo Bridge:

View 13 of the HTVIA is LVMF view 15B.1 and is from the Westminster end of the bridge looking downstream towards St Paul's. In similar vein to our comments in relation to View 11 (see above), the impacts are the same. The proposal will introduce a more abrupt interface between the city cluster and the lower rise skyline to the right of St Paul's. The LVMF guidance states that new development which draws the emerging clusters of tall buildings closer to St Paul's Cathedral from these viewpoints, whether on its left or right hand side, should preserve or enhance the composition of the view, the Cathedral's relationship with its clear sky background and should not dominate the dome or western towers. We contend that the proposal does not accord with this guidance and that a lower building, maintaining a smoother height transition towards 22 Bishopsgate, should be considered.

Impact from Somerset House Terrace:

View C12 of the HTVIA is view 22 within our draft Metropolitan Views SPD. The dome of St Paul's is visible in this view and is described in our draft SPD as the focal point of the view. The description goes on to say "the dome can currently be appreciated without the damaging impact of modern city towers". While this view has been compromised since the draft was produced the dome remains visible and a focal point. The proposal would introduce a building of considerably greater height to the right of the dome. We would contend that the height

	<p>of the new building diminishes further the primacy of the dome within this view and is harmful to the townscape.</p> <p>Conclusion: In conclusion we maintain our objection to this proposal and consider that the proposal has a harmful impact upon the townscape of Westminster and views from Westminster, several of which are identified as of strategic importance. We suggest the proposals would fail to adequately accord with policy HC4 of London Plan; Policy 40 F of Westminster's City Plan 2019-2040; and policies CS13 and CS14 of the City of London Local Plan 2015.</p> <p>Response to comments: Addressed in the Design and Heritage sections of the report.</p>
London Borough of Hackney	No comments received.
London Borough of Islington	<p>View 35 of the submitted Heritage, Townscape and Visual Impact Assessment shows that the proposed development would be visible from within the Grade I Listed Bunhill Fields. It is considered that the proposed development would contribute to the gradual erosion of the site's significance through development within its setting.</p> <p>The submitted Draft Construction Environmental Management Plan notes that City Road is proposed as a construction route. Should planning permission be granted by the City of London for the proposed development and should adjacent footways and highways (within Islington) be damaged during demolition and construction, appropriate reinstatement will need to be funded by the developer.</p> <p>Response to comments: An officer assessment of the points raised and consideration of the impacts identified by the London Borough of Islington are contained in the following sections of this report: Design and Heritage and Highways</p>
London Borough of Southwark	No comments received.
London Borough of Camden	<p>A major 22 and 63 storey commercial development is proposed at 55 Bishopsgate in the City of London.</p> <p>It is situated approximately 2km from the nearest part of the Camden borough boundary, and thus there would be no noticeable effects on the amenity or living conditions of any Camden residents or occupiers. Similarly there would be no</p>

	<p>adverse effects on the transport conditions in Camden or on air quality.</p> <p>The site is not within Camden's protected views of St. Paul's from Primrose Hill, Parliament Hill or Kenwood. However, it would be visible on the City skyline from those Camden sites. The Townscape, Heritage and Visual Impact Assessment which accompanies the application shows that the proposal would be similar to existing development in the City and it is not considered to result in harm to the protected views of St Paul's or the general views of the City skyline from these sites.</p> <p>The development would have no material impacts on the significance of any protected views, on the amenity of any Camden occupiers or visitors, on transport, environmental or ecological conditions. Thus Camden therefore raises no objections to the application.</p>
Royal Borough of Greenwich	No comments received.
District Surveyor	The District Surveyors Office has reviewed the fire statement. In respect of the Mayor's policies D5 and D12, I have no comments.
Environmental Health	Conditions requested relating to Demolition Management Plan, Construction Management Plan, Noise and vibration from plant, Odour, Servicing hours, Roof terrace hours and management, Contaminated land, Noise insulation, Lighting Strategy. Informatives are recommended.
Lead Local Flood Authority	<p>First consultation: Conditions required on the details of SuDs and their maintenance.</p> <p>Second consultation: Do not wish to make any further comments.</p> <p>Response to comments: Conditions are recommended.</p>
Waste	The proposed waste storage and collection facilities indicated in Drawing No. 55BG-AFK-B2-DR-AR-09497 Rev P01 and outlined in Transport Assessment, October 2022, comply with our requirements. Therefore, this division will not raise any objections to this application.

Letters of Representation

25. In accordance with the SCI, notification letters were sent to residential properties in the vicinity in addition to the site and press notices as set out above. Responses received can be summarised as follows:

Objections

26. First consultation

Letters of representation – 4 letters of objection received	
<p>Eversheds Sutherland (International) LLP Representing The Wardens and Society of the Mistery or Art of the Leathersellers of the City of London – freeholders of 3, 5, 6, 7, 15, 16 and 17 St Helen’s Place; 33 Great St Helens; 52-68 and 88 Bishopsgate; 12/20 Camomile Street; and 25-51 and 61 St Mary Axe</p>	<p>We have undertaken a review of the available information relating to the above planning application and we have substantive concerns regarding the planning merits of the Proposed Development and the potentially adverse impact it could have on surrounding built environment, important heritage assets and public services. It is also the case that we have further concerns that the amenity and natural light at these properties will be prejudiced. Our client has yet to conclude its detailed impact assessment of the scheme and reserves its position in relation to these issues. These concerns are set out below.</p> <p><u>Impact on the St Helen’s Place Conservation Area and the setting of nearby heritage sites and listed buildings</u></p> <p>As the applicants makes clear the City Council is under an important statutory duty to have regard to the requirements of the Planning (Listed Building and Conservation Areas) Act 1990 (the “Act”) in determination of this application. The principle statutory tests of relevance within the Act are:</p> <p>Section 66(1) which states that: “in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses” and</p> <p>Section 72(1) which states that: “in the exercise, with respect to any buildings or other land in a conservation area, of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”</p> <p>Paragraphs 199 to 203 of the National Planning Policy Framework (the “NPPF”) explain how the Act is expected to work in practice and makes clear that the City Council must consider the impact of the Proposed Development on the significance of the designated heritage asset and that “great weight should be given to the asset’s conservation”.</p>

In this context, any substantial harm should lead to the refusal of planning consent in the absence of substantial public benefit (paragraph 201) and where there is likely to be less than substantial harm a “balanced judgement will be required having regard to the scale of the harm or loss and the significance of the heritage asset” (paragraph 203).

As is made clear in the Court of Appeal decision in *Catesby Estates Ltd -v- Peter Steer and Secretary of State for Communities and Local Government* [2018] EWCA Civ 1697, this assessment of harm requires careful consideration having regard to the particular facts and circumstances of each case. This is reflected at paragraph 29 of the judgement which indicated that: “Under current national planning policy and guidance in England, in the NPPF and the PPG, the decision-maker has to concentrate on the “surroundings in which [the heritage] asset is experienced”, keeping in mind that those “surroundings” may change over time, and also that the way in which a heritage asset can be “experienced” is not limited only to the sense of sight. The “surroundings” of the heritage asset are its physical surroundings, and the relevant “experience”, whatever it is, will be of the heritage asset itself in that physical place.”

As the City of London will be aware, the relevant statutory development plan for the Proposed Development comprises the City of London Local Plan 2015 and the London Plan (2021). Alongside the development plan further relevant material considerations include, the NPPF (revised July 2021), City of London Draft City Plan 2036, Conservation Area Supplementary Planning Documents, Tall Buildings in the City of London Report (2019) and the Protected Views SPD (2012).

City of London Local Plan Policy CS14: Tall Buildings

Policy CS14 outlines the City’s tall buildings policy and recognises the unique environment and built heritage of the City and its sensitivity to the development of tall buildings:

“To allow tall building of world class architecture and sustainable and accessible 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, by:

1. Permitting tall buildings on suitable sites within the City’s Eastern Cluster.
2. Refusing planning permission for tall buildings within inappropriate areas, comprising: conservation areas; the St Paul’s Heights area; St Paul’s protected vista viewing corridors; and Monument views and setting, as defined on the Policies Map.
3. Elsewhere in the City, permitting proposals for tall buildings only on those sites which are considered suitable having regard

to: the potential effect on the City skyline; the character and amenity of their surroundings; including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features.

4. Ensuring that tall building proposals do not adversely affect the operation of London's airport." (our emphasis)

The Site is located within the Eastern Cluster of the Local Plan, an established area identified for significant growth, to be accommodated in tall and large buildings. However, we consider that the proposal is contrary to Policy CS14.

The Proposed Development does not take account of the character of the surroundings, notably the prevailing scale of development in the St Helen's Conservation Area and 52-68 Bishopsgate. In Volume 2 of the Environmental Statement, the Townscape and Visual and Built Heritage Assessment, ("HTVIA") reports within the Designated Heritage Receptor Table that the Proposed Development will have a medium impact on the St Helen's Conservation Area receptor because "the scheme will be highly visible and prominent addition within the setting of the Conservation Area as is characteristic of the existing setting to the heritage receptor."

The Proposed Development affects the quality of townscape views on the ground and screens existing views of dynamic and varied townscape/roofscape and buildings of the highest significance. Character Area 2 is assessed at paragraph 7.39 of the Townscape and Visual and Built Heritage Assessment. St Helen's Conservation Area and a number of highly significant historic places of worship, including the Guild Church of St Ethelburga (Grade I), the Church of St Helen (Grade I), the Church of St Andrew Undershaft (Grade I) and the Synagogue on Bevis Marks (Grade I) are located in this area. This is reflected in the assessment that identifies some 50 associated viewpoints. The Assessment has rated the prevailing townscape value as 'Medium', and it is noted that a Full Assessment is still to be undertaken in any sufficient depth.

We further note that the Proposed Development would cause harm to the significance of a number of the heritage assets of the highest importance including St Paul's Cathedral. This is confirmed by Historic England in Table 9.1 who have identified that harm due to the way in which the proposal would draw the eye away from the Cathedral in favour of the Eastern Cluster. Notably, this is coupled with the identified harm to the way in which the proposed new building would also appear behind or adjacent to the historic roofline of the Whitehall buildings, specifically Horse Guards (Grade I listed) and Whitehall Court (Grade II* listed), in views from St James's Park.

City of London Local Plan Policy DM10

Policy DM 10.1 of the City of London Local Plan requires all developments to be of a high standard of design and to avoid harm to the townscape and public realm by ensuring that: “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”.

2.12 The applicant makes reference to and acknowledges major change to the skyline composition of the view as a consequence of the development, however the assessment fails to then grapple with the specific terms of the policy. As a consequence, there is very limited reference to massing, form and scale in the HTVIA. This approach, to put it at its lowest level, oversimplifies the townscape and visual assessment process by failing to grapple with the requirements of Policy DM 10.1. For example, 52-68 Bishopsgate is described as having “a grand principal façade and entranceway and a high quality example of neo-classical commercial architecture”, yet the assessment brushes over this by stating that the linear and contemporary nature of the Proposed Development’s form will reinforce the deliberate juxtaposition between the natural stone and ornate facades of the historic building. We believe, to the contrary, the Proposed Development will dilute and harm these special architectural qualities, and any robust and effective assessment of the application scheme against the relevant policy test would demonstrate the inadequacies of this assessment and the harm caused to the distinctiveness of the City’s characteristic and historic network of streets and alleyways which includes buildings of differing heights, scale, age and architecture.

The character of the townscape of St Helen’s Place Conservation Area with large scale, modern development is noted and is undoubtedly a feature of the Eastern Cluster. However, the submitted assessment of the heritage impact (together with a more effective and rigorous townscape and visual assessment) clearly demonstrate that the cumulative impact of new and substantial modern development has reached a ‘tipping point’ of significant harm to the designated heritage assets within this part of the City. In these terms, it cannot simply be assumed that this part of the City can accommodate an infinite number of tall buildings of any increasing shape or size without any irreversible harm to this important historic context.

City of London Local Plan Policy CS7: Eastern Cluster

It is also necessary to consider City of London Local Plan Policy CS7. Whilst changes to the scale, composition and urban form of the Eastern Cluster is not in itself contrary to Policy CS7, it is

evident that the cumulative effects of the Proposed Development, along with the existing tall buildings, and those recently granted planning permission, are by increment threatening, or have already, undermined the character and appearance of the designated Conservation Area.

In this context, the proposed introduction of the tallest building within the City and in such close quarters to St Helen's Conservation Area can only serve to further compound this position. It is, for this reason, clear in review of the HTVIA that the proposed building will cause significant harm, or at the very least less than substantial harm, to the character of the St Helen's Conservation Area by virtue of its height and form and the increasing perception of the Conservation Area being hemmed in by tall buildings. This will be considered in more detail below.

It is important, in our view, to consider in the planning balance the identified harm to the St Helen's Place Conservation Area and other heritage assets against the specific policy expectations of City of London Local Plan Policy CS7. That policy seeks to ensure that:

"the Eastern Cluster can accommodate a significant growth in office floorspace and employment, while balancing the accommodation of tall buildings, transport, public realm and security and spread the benefits to surrounding area of the City."

The policy has seven aims which include:

"Increasing the provision of sustainable, energy-efficient, attractive, high quality office floorspace in a range of accommodation types, that meet the varied needs of office occupiers and achieve modernisation of office stock."

The policy isn't in any way concerned with the promotion and realisation of tourism led development and is very specific in providing that the justification for tall buildings within the cluster is to "accommodate a significant growth in office floorspace and employment".

It is, in this context, clear that the proposal to secure a "Commercial floorspace for offices (Class E), multi-purpose, publicly accessible space on the ground floor, part Level, 02 and Level 03 of the building (Sui Generis), a conservatory and viewing platform roof top amenity space, including LG Conservatory Lobby (Sui Generis), New and improved public realm" is not supported by established or emerging policy in the City of London Local Plan. It must also follow that this policy deficit ensures that there is very little available to counterbalance the harm to the identified heritage assets within the City and, most notably, St Helen's Place Conservation Area.

In short, the planning balance when considered through the lens of established and emerging policy is very firmly tipped against the application proposal.

Townscape and Visual and Built Heritage Assessment – Further Analysis

We do not agree with the findings of the Townscape and Visual and Built Heritage Assessment.

The Designate Heritage Receptors table assesses for St Helen's Conservation Area that:

"The scale of more recent development enclose the CA to the north, south and east. St Helen's Church is an isolated medieval element in this context, nestled in a layered townscape including a number of tall buildings. The scheme will be highly visible and prominent addition within the setting of the Conservation Area as is characteristic of the existing setting to the heritage receptor. The magnitude of impact on the receptor is judged to be medium. Professional judgement has been applied to come to the conclusion that the effect will be neutral because the Proposed Development will not diminish or enhance the value of the receptor".

The Environmental Statement reports that St Helen's Conservation Area is "the sole survivor of an intricate pattern of spaces and alleys which once connected Bishopsgate and St Mary Axe". The Environment Assessment acknowledges that the Proposed Development will be highly visible and prominent, and despite assessing the magnitude of the impact to be medium, the conclusion reached is that the effect will be neutral.

At 46 of the Designated Heritage Table, 52-68 Bishopsgate, a Grade II listed building is assessed. The heritage value is reported to be 'Medium' and it is considered to have a neutral contribution to its heritage value given the erosion of the historic character by contemporary buildings. The assessment reports that the Proposed Development will be a "highly visible and prominent addition within the setting of the listed building" and that "whilst this is characteristic of the existing setting, the jump in scale and change in visual experience is pronounced that we would identify this as being a harmful impact". The Assessment relies on the Proposed Development "adding to the existing contrast established by modern skyscrapers and the historic environment which is of demonstrable smaller scale" to confirm that the magnitude of change would be "medium" only, and to then conclude that the significance of the likely effect on it by the Proposed Development is "moderate adverse".

In simple terms, the Applicants contend that because of the existing presence of tall buildings in the immediate vicinity of the St Helen's Conservation Area and 52-68 Bishopsgate, this inevitably ensures that the presence of such buildings must neutralise the impact of the Proposed Development upon the setting of these heritage assets. As such, when there is already an existing body of development, adding one additional building to the Eastern Cluster, cannot make a difference or increase the effect. Instead of assessing the impact of each incremental change to the urban landscape and the Cluster, the assessment relies on the existing buildings within the Cluster and the impact they already have, even if by increment the result is that the integrity of the heritage asset is lost completely. The Assessment acknowledges the St Helen's Conservation Area is the "sole survivor" but ultimately disregards the harm caused by the Proposed Development by concluding that the effect must be neutral.

It is, in our view, axiomatic that the effect of the Proposed Development must be harmful to the character of the St Helen's Place Conservation Area and 52-68 Bishopsgate by virtue of the impact upon the surroundings in which the heritage asset is experienced and in application of the assessment made by the Court of Appeal in the Catesby case.

Daylight and Sunlight Impacts

Our client's property at 33 Great St Helens has been identified as a sensitive receptor in Chapter 12 (Daylight, Sunlight, Overshadowing, Solar Glare and Light Spill) of the Environmental Statement submitted with the application.

Chapter 12 assessed 11 windows serving four rooms at 33 Great St Helens, located in the south east of the site.

Daylight Assessment Proposed Development at Surrounding Sensitive Receptors - Vertical Sky Component (VSC) and No Sky Line (NSL)

Table 12.8 of this assessment and the accompanying narrative reports that only 6 of the 11 windows were found to meet BRE's criteria, leaving a total number of 5 windows affected, one of which would experience an alteration in VSC between 30-39.9% amounting to a Moderate Adverse effect whilst four of the 5 would experience an alteration in excess of 40% which is considered a Major Adverse effect.

Table 12.10 of this assessment and the accompanying narrative reports that only two of the 11 windows assessed would meet BRE's criteria. Of the nine affected windows, two windows would experience an alteration in VSC between 30-39.9% which is considered a Moderate Adverse effect whilst seven would

experience an alteration in excess of 40% which is considered a Major Adverse effect. For NSL, all four rooms assessed see losses greater than recommended by BRE and of the four affected rooms, all would experience an alteration in NSL greater than 40% which is considered a Major Adverse effect.

Cumulative Sunlight Assessment at Surrounding Sensitive Receptors (APSH)

Table 12.11 of this assessment and the accompanying narrative reports that 6 windows were assessed, only four windows would meet BRE's criteria and the remaining two windows would see an alteration greater than 40 % which is considered a Major Adverse effect.

The identified cumulative effect of the Proposed Development and other development schemes within the vicinity of 33 Great St Helens is of major concern to our clients who have already experienced the detrimental impact upon the function, operation and amenity of their buildings due to overshadowing and the loss of daylight and sunlight. Some of the rooms within this building are not well lit in the existing condition and the Proposed Development would negatively impact the existing light, leaving them with little or no natural light. As can be seen in the Daylight Assessment of the Proposed Development, four of the 5 windows would experience a Major Adverse effect and in the Cumulative Assessment two windows would see a Major Adverse effect. These impacts will have a harmful effect on the use and enjoyment of these rooms.

We have yet to conclude our detailed impact assessment of the Proposed Development and reserve our position in relation to these issues. We do, however, have serious concerns that 33 Great St Helens will experience a significant adverse impact as a result of the construction of another tall building in this area. The findings in the Environmental Statement show a clear risk that our client's enjoyment of their property will be materially affected.

Public Transport

5.1 Chapter 7 (Traffic and Transport) of the Environmental Statement reports the findings of an assessment of the likely effects on Traffic and Transport as a result of the Proposed Development, both during deconstruction and construction and once the Proposed Development is complete and occupied / operational. The existing traffic flows at Bishopsgate (South of St Helen's Place) shown in Table 7.6 is currently 22,109, the traffic flows on the local highway network at the Future Year Baseline will increase to 24,096 as shown in Table 7.15 and the Future Year Baseline with Proposed Development will be 24,448. This will result in a heavily congested pedestrian network. The Pedestrian Comfort Level (PCL) Results - 2030 with the

Proposed Development at Figure 7.8 also show a decline in PCL – from a Level B in 2015 to Level B- in Scenario 1 Future Baseline and from a Level A- in 2015 to a Level B+ in Scenario 1 Future Baseline.

The pedestrian and road network in the vicinity of the Proposed Development is also heavily congested during peak times, carrying very high volumes of people and traffic. The Proposed Development will put an additional burden on this infrastructure and further details as to how the applicant will fully address the increasing pressures on local highways, walkways and cycleways must be provided, the provision of a standalone Travel Plan does not go far enough and the final package of measures should not be delayed until occupation.

The occupation of the Proposed Development, with the identified tourist movements in an already congested business quarter, will result in a major uplift in trips across London Underground services, in particular the Central, Northern and Waterloo and City lines. In addition, an emerging area of concern is the growing reliance amongst developers in the Eastern Cluster as to the capacity of Crossrail to accommodate cumulative transport pressures. We have concerns that this overtly optimistic reliance on Crossrail is entirely unrealistic, given the City of London's own research briefing paper on the impact of Crossrail and the clear suggestion that it might well be at capacity immediately at the point of opening.

Chapter 7 concludes at 7.157 that there are no significant residual traffic and transport related effects identified as a result of the deconstruction and construction phase, and no significant residual adverse highways and transport related effects identified as a result of the completed and operational development. The Environmental Statement understates the significant impacts on traffic flows, and uses this to justify the decision not to deliver Completed Development Mitigation. The report merely states that as part of the sustainable nature of the Proposed Development a number of measures are proposed to encourage travel by non-car mode. We have profound concerns that the applicant is not delivering any Completed Development Mitigation measures, to manage the flow of pedestrians and manage tourist visits to the Proposed Development. We would expect the applicant to make significant provision to secure improvements to the local public transport network to both increase capacity and relieve congestion. We believe, in the absence of these measures, that the application proposal is flawed and fails to adequately consider the potentially significant impacts on the transport network that a development of this scale is likely to cause.

Waste

The Environmental Statement does not consider the impacts of the Proposed Development on waste and recycling facilities despite its size and the proposed provision of a significant international tourist destination. Inadequate waste management arrangements risk blighting our client's substantial property holdings within the vicinity of the Proposed Development, potentially causing amenity issues and affecting their enjoyment of their property.

The proper assessment of waste management is now required pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (Schedule 4, paragraph 1(d)) and given the nature and scale of the application proposal it is reasonable to expect that this issue would have been assessed in detail as part of the submitted Environmental Statement. We are, in the circumstances, concerned there is insufficient information provided as part of the application submission to allow for due consideration of this important issue and to afford the City Council the opportunity to understand the potential effects of the Proposed Development. Further details as to how this matter will be resolved should be provided before the determination of the planning application.

Wind

It is reported in Chapter 11 of the Environmental Statement, CFD Analysis, that there are two instances of strong winds where winds exceed the safety criteria, these are the same locations as in configuration 1 (which can be seen in Figure 11.3 – Existing Site with Existing Surrounding Buildings – Pedestrian Comfort Conditions – Windiest Season – Ground and Terrace Level) but it is reported these are made worse and accordingly a Major Adverse (significant) effect has been identified. The two locations are at the entrance to 42-44 Bishopsgate and in the Great St Helens roadway covering location 26 and 235. It is stated that while the above strong winds persist, their size is reduced compared to Configuration 2. It is reported in Configuration 6 Proposed Development with Tier 1 Cumulative Surrounding Buildings and Wind Mitigation Measures 6 that there is expected to be one instance of strong winds where winds exceed the safety criteria, this is the same as one location seen in configuration 1, but as this is made worse it represents a Major Adverse (significant) effect. The location is in the Great St Helens roadway covering location 26 and 235. It is stated that while the above strong winds persist, their size is expected to be reduced compared to configuration 3.

We have some concerns that this assessment is inconclusive and would invite the City Council to further investigate and satisfy itself that the acknowledged strong winds generated by the

	<p>development are not unacceptable and will be harmful to public safety.</p> <p>For the reasons set out above, our client objects to the planning application and would ask that these concerns are brought to the attention of the relevant Planning Committee.</p> <p>Response to comments: Addressed in the Daylight and Sunlight, Wind, Design and Heritage and Highways sections of the report.</p>
John Robertson	<p>I was partner in charge of the design of 55 Bishopsgate project (at Fitzroy Robinson Partnership) between in 1987-92, prior to founding John Robertson Architects in 1993. The design and massing of the present 55 Bishopsgate building was carefully negotiated with the City of London Planning Department at that time, who supported our designs for a building which would harmonize with the existing context and respect the scale, massing, architecture, and stone materials of the area and in particular the St Helen's Place conservation area.</p> <p>I have undertaken a review of the available information relating to the planning application and have substantive concerns regarding the planning merits of the proposal and the adverse impact the design will have on the surrounding built environment and in particular the St Helen's Place conservation area.</p> <p><u>Why the existing building should not be demolished.</u></p> <ol style="list-style-type: none"> 1. The existing building, designed by Fitzroy Robinson Partnership should not be demolished because its architectural design respects the townscape of this part of Bishopsgate and its massing is of a scale which is respectful of the St Helen's Place conservation area opposite and the nearby heritage assets including the Guild Church of St Ethelburga (Grade 1). 2. The architectural design responds sensitively to Mewes and Davis' Grade II listed Nos 52-68 Bishopsgate opposite. In accordance with the City's plot ratio restrictions at the time, 55 was kept to 5 principal storeys above ground and its two upper storeys step back in loggias and balconies so that the design does not overshadow its neighbours. It incorporates a subtle curve into its plan to mirror the slight bow in the elevation of 52-68 Bishopsgate, across the street and to strengthen this narrow point in Bishopsgate and minimize the visual impact of the building on the St Helen's Place conservation area opposite. 3. The scale and massing of 55 also provides 'breathing space' between the National Westminster Bank Tower (now Tower 42) and the 99 Bishopsgate tower; both buildings would be subsumed by the proximity of a new 63 storey tower.

4. The architectural design of existing building received favourable reviews when it featured in Architecture Today - February 1992, in which the writer and critic John Worthington notes: "55 Bishopsgate is an asset to the City of London. It brings a dignity back to Bishopsgate, provides a continuity of streetscape and offers both framed vistas and enjoyable fragmentary details. It succeeds as cityscape and has a quality of detailing and robustness that should outlast fashion".

5. The existing building is also recognized in Pevsner - The Buildings of England, London 1: The City of London. "No 55 also by Fitzroy Robinson Partnership was originally built between in 1988-91. Very long, gently curved stone-faced front, horizontally divided into dark stone podium, four upper storeys of square recessed windows in two sizes, then setbacks. Big inset bow, set offcentre. The paraphrased classical detail echoes Otto Wagner here and there."

6. 55 Bishopsgate is an important City of London building and is part of the architectural history of the Big Bang era of real estate development from 1986-92.

7. The 20th Century Society has objected to the demolition of the existing building and has made an application to Historic England for the building to be listed. I was consulted by the 20th Century Society about the design and history of the building, and I support the application for listing. (Refer to 20th Century society's letter of objection dated 14th November 2022).

8. The existing building was designed as a flexible loose fit, long life structure which can be easily refurbished and adapted. For example, the existing building is designed with a 9m x 9m structural grid and with floor-to-floor heights varying from 4.030m to 4.580m. (The floor-to-floor heights of the proposed tower are 3.950m). Putting aside the issues of sustainability, no meaningful justification has been provided in the application documentation to explain why it is not viable to retrofit the existing building. Impact of the Planning Application Proposal on townscape views and the setting of nearby heritage assets.

Policy DM 10.1 of the City of London Local Plan requires all developments to be of a high standard of design and to avoid harm to the townscape and public realm by ensuring that: "the bulk and massing of schemes are appropriate in relation to their surroundings and have due regards 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, lanes, alleys and passage ways."

There is very limited reference to the justification for the proposed massing, form and scale of the proposal in either the Design and Access or the Statement or the Heritage Townscape View Impact Assessment (HTVIA).

Furthermore, I do not agree with the findings of HTVIA Built Heritage Assessment on the designated Heritage Receptors - Pages 36 to 112. For example, in respect of the St Helen's Place conservation area the magnitude of impact of the completed development is assessed by the applicant to be Minor Adverse and Not Significant, whereas from my assessment of townscape view 50 on page 360, the conservation area will be overwhelmed and overshadowed by the scale and visual impact of the tower. (Please note this is a partial computer-generated view and shows approximately 32 storeys of the 63 storey tower, (about half of its overall height). However, the view clearly shows the profile of the roof forms and silhouette of Grade II listed 50-68 Bishopsgate will be very significantly harmed by the scale and massing of a tower and the impact on the conservation will be Significant, Harmful and Adverse.

From a review of the photo-montage views available in the Environmental Statement Volume 2: Heritage, Townscape and Visual Impact Assessment (HTVIA), the effect of a tower of this scale on important City of London townscape and other views will be both significant and harmful. I highlight the following views identified in the HTVIA will be significantly harmed and impacted by the proposal:

1. HTVIA: View 33/ Page 292, London Wall, corner of Fore Street Avenue.
2. HTVIA: View 34/ Page 296, Finsbury Circus, adjacent to Britannic House.
3. HTVIA: View 43/ Page 332, Bartholomew Lane looking along Throgmorton Avenue.
4. HTVIA: View 44/ Page 336, Copthall Avenue looking along Austin Friars.
5. HTVIA: View 46/ Page 344, London Wall corner with Old Broad Street (please note the CGI does not show the full impact of the tower on the view).
6. HTVIA: View 47/ Page 348, Bishopsgate, corner with Middlesex Street
7. HTVIA: View 49/ Page 356, Bishopsgate, junction with Cornhill, Leadenhall street (Please note the townscape view of Bishopsgate as a City Street because of the impact of the tower.
8. HTVIA: View 50/ Page 360, View from St Helen's Place.
9. HTVIA: View C01, View from St James's Park

For the reasons set out above, I object to the planning application and would request that these concerns are brought to the attention of your Planning Committee in the event you decide to recommend this application for approval.

	<p>Response to comments: Addressed in the Design and Heritage and Sustainability sections of the report.</p>
<p>Max Skjoldebrand</p>	<p>I was a senior member of the project team working with John Robertson at Fitzroy Robinson Partnership during the design and construction of the current building at 55 Bishopsgate. I was also the lead project architect (also at Fitzroy Robinson Partnership) for the reconstruction of 55 Bishopsgate 1993-1994 after it was severely damaged in the IRA Terrorist Bishopsgate bomb blast in 1993.</p> <p>I am writing to object to the planning application for 55 Bishopsgate for the following reasons:</p> <ol style="list-style-type: none"> 1. The existing building designed by Fitzroy Robinson Partnership should not be demolished because it is an integral part the townscape of Bishopsgate and is of a scale and proportion which is respectful of Mewes and Davis's 52-68 Bishopsgate (1928) opposite. Please see my comments under 7 below. 2. The design carefully respects and responds to Mewes and Davis' Grade II listed Hudson Bay House (Nos 52-68 Bishopsgate) opposite. In accordance with the City's plot ratio restrictions at the time, 55 was kept to 5 principal storeys above ground and its two upper storey's step back in loggias and balconies so that the design does not overshadow its neighbours. It incorporates a subtle curve into its plan to mirror the slight bow in the elevation of Hudson Bay House, across the street. This subtle bow also strengthens this narrow point in Bishopsgate and minimize the visual impact of the building on the St Helens place conservation area opposite. Please see, also, my comment under I below. 3. The existing building was designed as a flexible loose fit, long life structure which can be easily refurbished. No justification has been provided to explain why it is not viable to retrofit the existing building. 4. The existing building received favourable reviews when it was featured in Architecture Today (February 1992) in which the writer and critic John Worthington notes "55 Bishopsgate is an asset to the City of London. It brings dignity back to Bishopsgate, provides a continuity of streetscape and offers both framed vistas and enjoyable fragmentary details. It succeeds as cityscape and has a quality of detailing and robustness that should outlast fashion". 5. The existing building is also recognized in Pevsner The Buildings of England, London 1: The City of London. "No 55 also

by Fitzroy Robinson partnership was originally built between in 1988-91. Very long, gently curved stone-faced front, horizontally divided into dark stone podium, four upper storeys of square recessed windows in two sizes, then set backs. Big inset bow, set off-centre. The paraphrased classical detail echoes Otto Wagner here and there.,,

6. 55 Bishopsgate is an important City of London building and is very much part of the architectural history of real estate development in the City from 1986 to 1992.

7. The site, whilst not within a conservation area, is surrounded by Conservation Areas on nearly all sides (Volume 2: Built Heritage, Townscape and Visual Impact Assessment Part 1: The Heritage Asset Plan, page 37). The application must be considered in this overall context.

Two buildings directly opposite 55 Bishopsgate are within the St. Helen's place Conservation Area: 46 Bishopsgate (listed grade II) (#45 on The Heritage plan) and 52-68 Bishopsgate (listed grade U) (#46 on The Heritage Asset plan). The Heritage Value of 52-68 Bishopsgate provided on page 50 is described as follows: "The building derives historic interest as a well-preserved example of an early 20th century commercial building, built in the Neo-Classical style. It articulated the period of commercial development in this area of the City, which was defined by the design and use of buildings for banking and associated commercial activities. The building derives architectural interest owing to the survival of its grand, extensive principal facade and entranceway which is a high quality example of Neo-Classical Commercial architecture." Please note that this description, with some amendments, can also be applied to the existing building at 55 Bishopsgate:

Very much contrary to the description of 55 Bishopsgate in its current form under "Contribution of Setting to Heritage Value" for both 52-68 Bishopsgate and 46 Bishopsgate as "an uninteresting, mediocre piece of architecture" (pages 49 and 50), 55 Bishopsgate derives historic interest as a well-preserved example of a late 20th century commercial building, built in the 'contextual civic modernism' style, enhancing the period of commercial development in this area of the City, which was defined by the design and use of buildings for banking and associated commercial activities. The building derives architectural interest because it brings dignity ... to Bishopsgate, provides a continuity of streetscape and offers both framed vistas and enjoyable fragmentary details' and because it succeeds as cityscape and has a quality of detailing and robustness that should outlast fashion.' (John Worthington, Architecture Today, February 1992).

Therefore, it is simply not true to contend that the site of 55 Bishopsgate currently is "an undistinguished element in the

setting of this listed building"(referring to both 52-68 Bishopsgate and 46 Bishopsgate) as stated under "Full Assessment of the Proposed Development on the Heritage Receptor" (pages 49 and 50).

8. 'The scale of the proposed building and its low level treatment will', indeed, (to quote from Full Assessment of the Proposed Development on the Heritage Receptor, pages 49 and 50) 'cause a change to the character of the urban realm immediately opposite the site' but NOT for the better. The contextual relationship between architecturally significant buildings on either side of Bishopsgate at this location will be destroyed by the new development at 55 Bishopsgate.

9. The bulk and massing of the proposed 63 storey tower will have a serious impact on the important townscape views from the nearby Bank, St Helens Place, Finsbury Square and Bunhill Fields conservation areas.

10. It is clear, from a review of the photo-montage views available in the Heritage, Townscape and Visual Impact Assessment (HTVIA), that the following townscape views will be significantly harmed by this application:

1. HWIA: View 13/ Page 208, Waterloo Bridge: Downstream close to the Westminster Bank

2. HWIA: Views 14 & 14.1/ Pages 212 & 216, Waterloo Bridge: Downstream - at the centre of the Bridge

3. HTVIA: View 15/ Page 220, the South Bank, Gabriel's Wharf viewing platform - centre of North-east rail In views 13,14 & 15, the gradual massing of the existing tall buildings in which the tallest are in the centre of the group and the lower buildings are on the periphery will be destroyed by the proposed development. The proposed development will also impinge on the views of St. Paul's from these locations.

4. HTVIA: View 33/ Page 292, London Wall, corner of Fore Street Avenue.

5. HTVIA: View 341 Page 296, Finsbury Circus, adjacent to Britannic House.

6. HTVIA: View 42/ Page 328, Bank Junction

7. HWIA: View 43/ Page 332, Bartholomew Lane looking along Throgmorton Avenue.

8. HTVIA: View 44/ Page 336, Copthall Avenue looking along Austin Friars.

q. HTVIA: View 45/ Page 340, Liverpool Street, looking South along Old Broad Street

10. HTVIA: View 46/ Page 344, London Wall corner with Old Broad Street (please note the CGI does not show the full impact of the tower on the view).

11. HTVIA: View 47 / Page 348, Bishopsgate, corner with Middlesex Street

	<p>12. HTVIA: View 49/ Page 356, Bishopsgate, junction with Cornhill, Leadenhall street (Please note the townscape view of Bishopsgate as a City Street as a result of the impact of the tower.</p> <p>13. HTVIA: View S0IPage 360, View from 5t Helen's Place. The conservation will be completely overwhelmed and overshadowed by the visual impact of the tower. The view included the HTVIA only shows about 32 storeys of the tower, about half of its overall height. The important view of the silhouette of Mewes and Davis's Grade II listed 50-68 Bishopsgate will be very significantly harmed in this view.</p> <p>The 20th Century Society has also objected to the demolition of the existing building and has made an application to Historic England for the building to be listed. (Refer to their objection letter dated 14th November 2022).</p> <p>Response to comments: Addressed in the Design and Heritage and Sustainability sections of the report.</p>
<p>Judy Robertson</p>	<p>I am a Blue Badge guide and I have an interest in the quality of contemporary City of London architecture. I object to the planning application for 55 Bishopsgate for the following reasons:</p> <p>1. The existing building is a good contextual modern civic building. 55 Bishopsgate sits opposite the important St Helen's Place Conservation Area on the eastern side of Bishopsgate and is near four Grade 1 listed places of worship. The building is mentioned in Pevsner's "The Buildings of England". The building was designed to be of human scale and to be reflective of its older neighbour opposite, the Mewes and Davis building designed for the Hudson Bay Company in 1926 (52-68 Bishopsgate). The architect of 55 Bishopsgate intended the building to provide a "breathing space" between the Tower 42 and 99 Bishopsgate and to be respectful and in keeping with the St Helen's Place conservation area opposite the site. Much care was taken to use contextual materials, with limestone and granite to complement the older buildings opposite and the upper four of the nine floors set back in deference. The building was also designed for long life, with generous floor to floor heights and could be easily retrofitted, saving the loss of embodied carbon because of its demolition.</p> <p>55 Bishopsgate received complimentary reviews in the architectural press when first constructed in 1993. The retention of 55 Bishopsgate is strongly supported by the 20th Century Society and their opinion should be appreciated as evidence of its architectural value, particularly in respect to detailing and its positive contribution to the townscape of Bishopsgate.</p> <p>Furthermore, the building is structurally sound and could be easily repurposed and the sustainability aspect should not be underestimated.</p>

2. I have studied the assessment of impact of the tower on the townscape views in the Heritage, Townscape and Heritage Impact Assessment (HTVIA) submitted as part of the application and it is clear the proposed tower will cause significant and substantial harm to the local townscape and to the St Helen's Place conservation area. (Please note HTVIA View 50 fails to show the full impact and scale of a 63 storey tower in relation to the St Helen's Place conservation area because only half the height of the tower is shown in the view.) The preservation of any conservation area should be at the forefront of the City's future planning policy. If 55 Bishopsgate is demolished and the proposed skyscraper built in its place, it will not only cause the loss of a much respected building but cause very substantial harm to the setting of both 52-68 Bishopsgate and to the interesting enclave at St Helen's Place, home of The Leathersellers' Company.

As the St Helen's Place Conservation Area character summary states: "These imposing early twentieth century buildings are a dignified group of consistent scale, architectural character and materials, and provide a pleasing harmony and a human scale in a place which has such a strong commercial character. The richness of the frontages, some 100m in length, provides the backdrop, which defines and encloses St. Helen's Place - a space of distinction." These qualities of harmony and human scale will be damaged by the scale of this proposal.

The Victorian and Edwardian commercial buildings along Bishopsgate are also important in so far as they provide a visual balance between the traditional and emerging City of London and need to be preserved. The loss of buildings such as 55 Bishopsgate will contribute to making the City of London indistinguishable from other modern financial centres because its replacement with a glass tower will erode the very characteristics which make the City of London an attractive place to visit and do business.

3. The site of the proposed development is within the City of London's Eastern Cluster policy area, which allows for tall buildings, where their architecture is of very high calibre, - provided they would not harm the City's historic environment or the wider London skyline. The evidence presented in the HTVIA clearly shows the proposed tower on the site of 55 Bishopsgate will overpower its neighbours and its effect on many City townscape views will be very harmful. The height of the tower extends the northeast shoulder of the Eastern Cluster and encroaches into the important gap between the Eastern Cluster and St Paul's Cathedral view. This gradual erosion of the gap between the northeast will set the precedent for the further erosion and extension of the Eastern Cluster towards St Paul's Cathedral. The photomontage images show the high visibility of

	<p>the proposed tower on the skyline; it will have a changing effect on the relationship between St Paul's and the City of London, it will also affect the historic view from St James's Park, causing a negative impact on cultural and architectural heritage.</p> <p>4. The public benefits provided in this application comprise public access to a high-level viewing gallery at the top of the tower and open (but covered) public realm at the base of the tower. These benefits are insubstantial compared to the significant and substantial harm this proposal will cause to City of London townscape views and to the St Helen's Place conservation area.</p> <p>Response to comments: Addressed in the Design and Heritage, Sustainability and Planning balance sections of the report.</p>
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27. Second consultation

Letters of representation – 1 letter of objection received	
<p>Resident of, City Wall House, 10 Wormwood Street</p>	<p>In the past year 2 new skyscrapers have been completed just on Bishopsgate.</p> <p>8 Bishopsgate & One Bishopsgate Plaza.</p> <p>Construction is also going on for a new skyscraper right next to 8 Bishopsgate.</p> <p>How many of these skyscrapers do we actually need. The new proposal for 55 Bishopsgate is unworthy of being granted.</p> <p>Firstly the building will be too tall at 284m, this it would completely destroy the look of the skyline. It would be the 2nd tallest building by far and look completely out of place. Not to mention how the view from St. Paul's would get affected.</p> <p>After reading some of the comments I have to completely agree with the previous architects that the building already standing at 55 Bishopsgate is unique and adds a certain depth to the City. Not just another tall glass skyscraper. It would be very disappointing to see a unique and completely adequate building get demolished because of greed.</p> <p>Finally, living in the city, this skyscraper will affect not only the view from my flat but it will also cause a lot of shade. I barely get any sunlight through because of the skyscrapers, this building will remove the last bit of sunlight I get in my home. Along with the noise pollution & disturbance it will have on a street level.</p>

	<p>It would be really harmful not only to the city skyline & it's residents but it would also destroy a perfectly good building that actually adds character to the city. This alongside the fact it will affect the overall feel of some grade listed buildings is a no brainer. This project should be objected.</p> <p>Response to comments: Addressed in the Design and Heritage and Daylight and Sunlight sections of the report.</p>
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Support

First consultation:

	Letters of Representation – 6 letters of support
James Smith	This is stunning architecture and really unique. It's exactly what London needs to focus on building as a global city and will balance out the city skyline. NY and Sydney are building really beautiful modern architecture and London often focuses on dull design to appease complainers which makes the city look ugly. This is world class design! And i love that roof garden and open air viewing platform, will be a hit with online social media when it opens for sure
Amar T	This is absolutely wonderful, What a stunning piece of architecture and exactly what London needs. It makes the skyline looks more dynamic and vibrant, and having public access at the very top is a major bonus
Ivan Arenas Martinez	Really high quality design, more projects should be done like this. The height is also perfect for the area.
Otis Reed	I would like to offer my support for this high quality proposal. Although at street level the impact is neutral from afar, especially from the north and south this will provide a very useful and attractive counter balance to the bulk of 22 Bishopsgate which is currently disproportionately large (in terms of mass) compared to the rest of the city cluster.
Fabien S.	This is a great design and the shape and height really compliments the skyline, especially seen from Waterloo/ Charing cross bridges.
Steven Jacobs	<p>This is an excellent proposal, and I urge the planning authorities to approve it. The building would be an ideal addition to the Eastern Cluster for the following reasons:</p> <p>1) Design. The proposed building's use of structural steel to form an organic, leaf-like pattern is distinct from the monolithic glass cladding used on nearby tall buildings. The proposal would therefore add significant variety to the designs of tall buildings seen around the Eastern Cluster.</p> <p>2) Height.</p>

	<p>The tall buildings forming the northern elements of the Eastern Cluster, namely Tower 42, 30 St Mary Axe, 100 Bishopsgate and 110 Bishopsgate, create a visual plateau of around 170-200m AGL when the cluster is viewed from many angles. This plateau contrasts notably with the much taller height of 22 Bishopsgate at 278m AGL. With a height of 269m AGL, the proposed building at 55 Bishopsgate would add an intermediary element that breaks the lower plateau, and helps to integrate the roof heights of the aforementioned buildings together.</p> <p>3) Location.</p> <p>Currently, a disproportionate gap is present in the Eastern Cluster when seen from certain vantage points to the south east and north west of the City. (For example, views from the Thames Path between Rotherhithe and Bermondsey.) The empty space between 30 St Mary Axe and 100 Bishopsgate is greater than that of any other two buildings in the cluster. Due to being situated immediately to the north of Tower 42, the proposed building at 55 Bishopsgate would close this gap, forming a more coherent and substantial skyline for the City.</p>
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28. Not all the representations above are material planning considerations. Those that are, have been dealt with in this report.

Policy Context

29. 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.
30. The City of London (CoL) has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. An amended draft Plan is being prepared for consultation in early 2024, but the draft 2036 Plan 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.
31. 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.
32. 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

33. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
34. Paragraph 10 of the NPPF states that “at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:
 - a) approving development proposals that accord with an up-to-date development plan without delay; or
 - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
 - i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
35. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
 - a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
 - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
 - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
36. 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.
37. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.
38. 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.
39. Paragraph 93 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.

40. 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”.
41. 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.
42. 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”.
43. 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.”
44. 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.
45. 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...’

46. 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.
47. 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.
48. 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.
49. 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.
50. Paragraph 197 of the NPPF advises, “In determining applications, local planning authorities should take account of:
 - a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness.”
51. 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.

52. Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
 - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
53. 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”.
54. 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”.
55. 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

56. 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, to local finance considerations and to any other material considerations. (Section 70(2) Town & Country Planning Act 1990);
 - To determine the application in accordance with the development plan unless material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
57. 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).

58. 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.
59. 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.
60. The principal issues in considering this application are:
 - a) The economic benefits of the proposal.
 - b) The appropriateness of the proposed uses.
 - c) The appropriateness of a tall building
 - d) The appropriateness of the architecture and urban design of the proposals.
 - e) The impact of the proposal on the Tower of London World Heritage Site.
 - f) The impact on strategic views in the London Views Management Framework and on other strategic local views.
 - g) The impacts of the proposal on the setting and significance of heritage assets
 - h) The potential impacts of the development on buried archaeology
 - i) The proposed public realm benefits and cultural offer
 - j) Transport, servicing, cycle parking provision and impact on highways.
 - k) The impact of the proposed development on the amenity of nearby residential and other occupiers, including noise, overlooking, daylight, sunlight and light pollution.
 - l) The environmental impacts of the proposal including wind microclimate, flood risk, air quality, building resource efficiency, energy consumption and sustainability.
 - m) The outcome of the Health Impact Assessment
 - n) The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.
 - o) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010)
 - p) The requirement for financial contributions and other planning obligations

Economic Issues and the Principle of Development

61. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
62. 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.

63. 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.
64. 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.
65. 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.
66. 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.
67. 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.

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

73. 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;
74. The draft City Plan (2036) policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 2,000,000sqm during the period 2016-2036. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.
75. 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.
76. 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.
77. 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.
78. 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.

79. 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.
80. 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.
81. 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

82. The proposed building has been designed to provide a flexible workplace-led mix of uses. The part 63 storey and part 22 storeys above ground predominantly provides office use (Class E) with a viewing platform and rooftop amenity space (Sui Generis), a multi-purpose publicly accessible space part level 02 and level 03 (Sui Generis) and commercial floorspace (Class E).

Provision of Office Accommodation

83. Strategic Policy CS1 of the City of London Local Plan 2015 and policy 4.2 of the London Plan seek to ensure that there is sufficient office space to meet

demand and encourage 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 2040 and policy E1 of the London Plan.

84. The proposed development is predominantly an office building, comprising of 103,073 sq.m (GIA) of Commercial/Office Floorspace (including lobby) Class E (a net gain of 81,789 sq.m of office floorspace on this site). The total (GIA) is 125,089 sq.m, resulting in 22,016 sq.m of other uses. The office space is classified as Grade A office space. 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 103,073 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.
85. At 31st March 2022, 835,000 sq.m net increase in office floorspace had been delivered since 2016 and a further 576,000 sqm net was under construction or was permitted in the City. A further 589,000 sq.m net is required to meet the draft City Plan target of a minimum of 2 million sq.m net by 2036. The proposed development would deliver nearly 14% of this remaining floorspace target. The projected figure of office space need comes from an up-to-date evidence base which was written/secured for the Draft Local Plan.
86. The proposed development is 63 storeys. The office use is accessed from Bishopsgate with escalators to the office lobby on Levels 1 and 2. The lobby provides access to the office floors above at Levels 4 – 61 with retail space located at ground level. Emerging City Plan Policy OF1 promotes commercial uses as part of office-led development at ground levels to activate streetscapes.
87. The office spaces are designed to support a range of tenants, with flexibility to accommodate a variety of tenant requirements and the demands of business growth, with the options for single, dual, triple and quadruple tenant floor divisions which offer a range of interior environment amenity, floor area and choice of outlook which also 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.

88. 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. Levels 2 and 3 are dedicated to public benefit, including double height auditorium space and flexible floorspace which is designed to be appropriate for a range of potential workspace.
89. The S106 agreement would include an obligation to make specific and identified provision within the development for such occupiers. The proposed affordable workspace offer is for 25% of the floorspace in Level 4 to be affordable workspace at 50% discount to market rent, which would equate to circa 50 desks. This equates to 407 sqm (being 25% of the total Level 4 area of 1,628 sqm).
90. 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 81,789 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

91. The existing retail floorspace on the site is provided at ground floor level and is 774sq.m (GIA).
92. The proposed retail floorspace retains active frontages with a fully accessible and external public realm and comprises 58sq.m (GIA) of pop-up retail units and more permanent food and beverage units located under the tower. The design of the open public realm at the ground floor would provide space for people to dwell and create a more diverse mix of smaller retail type uses, including food, beverage, stalls, bars as well as conventional retail kiosks. The space has been designed to be adaptable to changing retail demand including the desire for more experiential retail, recognising the character of the public realm will evolve over time.
93. While the proposed development would result in a net reduction of 716sq.m (GIA) of traditional retail floorspace, it provides considerable flexible space in the public realm and at level 02 and 03.
94. There is a loss of retail floorspace, 716sq.m (GIA), contrary to policy. Under policy DM20.1 and emerging policy RE1, the amount of active retail frontage

remains largely the same due to the new pedestrian route through the building. The policy is to resist the loss of retail frontage and floorspace.

95. The new spaces proposed would be fit for purpose in the context of the changing retail market, being flexible and adaptable in layout and support of the long-term vitality and vibrancy within the City. Furthermore, the flexible space in the public realm and at level 02 and 03 would be consistent with the aspirations of the City as a modern retail environment and the reduction in net retail floorspace is acceptable.
96. In weighing the planning balance, it is necessary to take into account the fact that the current Local Plan and the emerging City Plan places emphasis on the primary business function of the City and on strengthening the cluster of activities that contribute to London's role as the world's leading international financial and professional services centre. The scheme would provide significant additional office floorspace, within the Eastern Cluster contributing to meeting the City's targets for increasing office floorspace. Other Local Plan objectives include provision of a new publicly accessible viewing gallery and conservatory providing higher level views and public areas, in line with emerging City Plan policy.
97. Although there is a loss of retail floor space, the amount of active retail frontage at ground floor level becomes more accessible. The proposed retail component of the scheme and creation of active frontages would enhance the public interest and vitality of the street frontage on Bishopsgate and increase the permeability into the building through the creation of permeable routes. The space can be used to provide pop up retail and contributing a further 58sq.m (GIA) of retail space.
98. The proposed retail would be fit for purpose in the context of a changing retail market, being flexible and adaptable in layout, in support of long-term vitality and viability of Bishopsgate. It is considered that the proposed use would complement retail uses at the neighbouring Leadenhall Market, particularly with the introduction of the proposed passageway providing increased access. During the day, there is potential for a pop-up retail space within the new permeable, accessible open space. This offer would provide a flexible and adaptable space which has the potential to address rapidly changing retail patterns and demand from the largely office-based employment in the Cluster. This space is flexible and would utilise the same space as the service entrance and so is considered on a flexible basis and is not permanent retail.
99. On balance it is considered that the loss of retail floorspace is acceptable, the mix of uses would provide a complementary use to the offices on the upper floors in accordance with Policy DM1.5, as well as provision for other workers, visitors and residents of the City in accordance with Emerging City Plan Policy OF1. However, the development proposed, would be contrary to adopted Local Plan Policy CS20, DM20.1 and Emerging City Plan policy RE1, however the site is not located within a Principal Shopping Centre or Retail

link. A condition is recommended to secure retail uses falling within Class E and Sui Generis as proposed, and to prevent the change to any other use within Class E.

Proposed Public Viewing Gallery ('Conservatory') & Viewing Platform

100. 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. Public access to tall buildings within the City is important in creating an inclusive City.
101. A new free to access public viewing gallery is proposed at level 62, the space would provide a 360-degree panoramic view and would be triple height, there would be a viewing platform at the rooftop which would be open to the air. The space would have a predominantly glazed roof and sides and there would be a mix of spaces for a range of activities.
102. The space would accommodate a maximum of 300 people at any one time, and this number would be managed to ensure evacuation and safety of all those visiting. The space would be accessed via dedicated lifts at lower ground level where a security check would take place.
103. The public viewing gallery and platform access would be via the public realm space at ground floor, via a pair of lifts and stair access to a lower ground level reception.
104. The combination of the public viewing gallery and platform would result in an elevated public space of the highest quality, providing dynamic 360-degree views across this part of London, providing a valuable space for culture as well as expansive views over London for all to enjoy.
105. The space would contribute to the network of free to enter viewing galleries across the City and internally would incorporate a cultural element.
106. The public viewing gallery would be free to access and would involve successful management of the space. The public viewing gallery and viewing platform would be open all year round (except Christmas Day, Boxing Day, New Year's Day) 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 would not be closed for private events during those hours. The Cultural Implementation Strategy would cover potential use for events outside the public access hours which would be secured via a Section 106 agreement. It would be accessed from the ground floor with dedicated lifts and security checks.
107. A Public Conservatory and Viewing Platform Management Plan would be secured through a Section 106 agreement with the finer details of the operation to be negotiated.

Design and Heritage

Principle of a Tall Building:

108. 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>) and London Plan D9 (A).
109. The proposal is in the Eastern/City Cluster of tall buildings, in accordance with the adopted Local Plan (Policy CS7, fig. G Policy and CS14 (1)) and the revised 'City Cluster' (Policy S21, fig. 33) in the emerging City Plan 2036. For the purpose of S21(B, Figure 33), the proposal would be located on a 'renewal opportunity site', where new tall buildings are sought on appropriate sites subject to their skyline impacts (S12). 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.
110. The site is in the Central Activities Zone, and the proposal would complement the unique international, national and London-wide role of the CAZ, as an agglomeration and rich mix of strategic functions, including nationally and internationally significant office functions, in line with London Plan Policy D4. It would be in a highly accessible and sustainable location, with the highest PTAL Level of 6B, with excellent access to transport infrastructure including active travel.. The site is central to the City's growth modelling, the significant majority of which will be accommodated in a consolidating City Cluster of tall buildings and would deliver 14% of the required commercial space to meet projected economic and employment growth demand until 2036. This quantity of floorspace would contribute to maintaining the City's position as the world's leading international financial and business centre.
111. Officers consider the principle of a tall building on this site is appropriate. The proposal draws strong support from adopted Policy CS1 and CS7, which seek to ensure the Cluster can accommodate the Plans significant growth in office and employment floorspace, whilst drawing support from CS14(1) (Tall Buildings), which seeks to consolidate tall buildings where they are least impactful on the strategic heritage and character of the CoL and London. This overarching balance is at the heart of the design-led optimisation of site capacity when assessing this against wider heritage and design policies.
112. The GLA Stage 1 Letter states that because the draft Local Plan does not explicitly identify locations where it may be appropriate for tall buildings, including maximum or appropriate heights, the proposals would not comply with D9 (B). Officers take a contrary view for the purposes of D9(B), and suggest the GLA fails to acknowledge the site is in the City Cluster and CS7

and S21 which identified the area for expansion and appropriate for tall buildings.

113. In any case, even if the GLA view were to be accepted, satisfying D9B is not a gateway to the application of the criteria in D9C. The GLA recognises this and states in Stage1 letter that the development may still be acceptable subject to it satisfactorily meeting the requirements of D9C.
114. An assessment against London Plan Policy D9 (C) and (D) is made below, with reference where relevant to other sections of this report for more detail. It is found that the proposal would largely satisfy the criteria in (C) and (D), but there would be some conflict with Part C (1) in terms of visual impacts to consider in the policy balance.
115. As a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9 A, B and D, Local Plan Policy CS 14(1,2, 4), CS7 (1,2 4-7) Emerging City Plan S12 (1,3-6) S21 (1,3-8). There is some conflict with London Plan D9 C (1) (a and d), Local Plan CS 14 (3), CS 7(3) and Emerging City Plan S12 (2) and S21 (2) due to adverse impacts on designated heritage assets and protected views. These impacts are identified below and addressed through the report. These conflicts with Development Plan policy are 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:

116. 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. Further assessment of the architectural approach and design details follow on below.

Visual Impacts:

The site is located in the northwest side of the City Cluster and, which is a carefully curated collection of tall buildings which serves as the heart of the City and London's financial and insurance industry. The City Cluster is growing into a significant group of tall buildings and its distinct collection of forms is, by definition, the contemporary expression of the evolution of the historic City skyline. The relationship of the proposal to the composition of the City Cluster has to be carefully considered in a range of long, mid and short range views.

In comparison with existing towers the proposal comprises a very tall building of 63 storeys (284.68m AOD) and a lower connected tall building of 22 storeys (112.30m AOD). The development would be the third tallest building in the City Cluster. In comparison, other existing and consented tall

buildings in the Cluster are 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

117. Officers and the GLA support the overall form/massing strategy, with development distributed across two buildings of different heights. The impact of the proposals upon the City and wider London skyline has fundamentally informed the optimisation of the site as expressed in and the architectural form. This represents an efficient use of the site, reducing overall the bulk and mass in an appropriate manner. The proposal would form part of a dense, consolidating cluster of tall buildings and would be opposite to Tower 42, 100 Bishopsgate and 22 Bishopsgate.
118. In relation to long range views, (Policy D9(C; 1 a; i) these have been tested in the HTVIA Views 1-15 and 19-22 which incorporate LVMF views 1-6 and 15, 16, 17, 19 and 26 and neighbouring Boroughs local views from Camden, Westminster, Southwark, Islington and Lambeth are included in the Environmental Statement Addendum HTVIA June 2023. Objections from statutory consultees and third party representations largely focus on these views and the impacts are discussed through the report and in detail in the Strategic View and Heritage sections of the report.
119. In baseline and cumulative panoramic views from the north, east and south the proposed tower would be compactly integrated within the spatial composition of the City Cluster as a more singular skyline form. In experiences from the west the development would be more detached from the apex of the emerging City Cluster due to the visual gap created in part by the St Helens Place Conservation Area. In these experiences the elegantly tapered form would be more boldly revealed as a distinct and well-conceived addition of a secondary summit, but the established hierarchy would prevail of stepping down from the taller 1 Undershaft, 22 Bishopsgate and to the lower height of the Tower 42. It is anticipated that as the Cluster consolidates, the

sky gap between 22 and 55 will be closed, assimilating the overall shape and form of the Cluster.

120. In long views from, Waterloo Bridge, Golden Jubilee/Hungerford Bridge and from St James's Park there are adverse impacts to the compositions, characteristics, landmarks and to designated heritage assets in the views. Objections from statutory consultees and third-party representations largely focus on these views and the impacts are acknowledged by officers and discussed in detail in the Strategic View and Heritage sections of the report. In relation to long range views, the development would draw some conflict with Policy D9(C; 1 a; i)
121. In relation to mid-range views, the consideration of London Plan D9(C; 1 a; ii): the impacts are largely demonstrated in HTVIA views 23-41. The GLA and third party representations identify harm to a number of these townscapes views due to the height of the building (reference consultation responses) and these are addressed through the report largely within the Heritage Section. In both baseline and cumulative approaches from City Road, Commercial Road, St Katherines Docks, Wentworth Street, Borough High Street, Queens Walk, Tower Bridge and Bank Junction the development would be read as part of the emerging Cluster, consolidating its distinctive form and below the datum of 22 Bishopsgate, stepping down from it.
122. In mid-range views from the west, from Fleet Street, London Wall, and from St Pauls Churchyard the development would stand alone from the main cluster due to the orientation. This sense of isolation will reduce over time due to anticipated consolidation within the Cluster. Equally the development is often experienced filling the sky gap between 100 Bishopsgate and 22 Bishopsgate with Tower 42 within the foreground and reinforces the spatial hierarchy of the City. However, it is anticipated that as the Cluster consolidates, the sky gap between 22 Bishopsgate and the proposal would enclose somewhat, to create a more coherent whole and less distracting gap, creating a more singular urban skyline form.
123. From Finsbury Circus the development would be appreciated in closer proximity. The mid to upper elements of the building are glimpsed through interposing vegetation in the proposed scenario. The lower elements of the proposals remain occluded from view by a combination of the lower scale development which already exists around Finsbury Circus as well as some of the buildings that form the City Cluster. The existing skyline gap would be infilled and again the scale between 100 Bishopsgate and 22 Bishopsgate would be better transitioned as part of a consolidating Cluster form.
124. From these mid-range distances, the observer would begin to experience the slender, elegant form of the proposals accentuated by the lattice work geometry of its upper elements and the upwards tapering effect. Its sparing, simple material palette would reinforce the simplicity of form, giving the form a

more elegant verticality. The buildings sculptural quality, combined with its glazed and transparent material will be highly legible and as part of the City Cluster composition in these experiences.

125. In relation to mid-range views, the development is considered to comply with London Plan D9(C; 1 a; ii).
126. In relation to immediate surrounding streets (London Plan D9(C; 1 a; iii)), HTVIA Views 42 to 50 illustrate the closer range views of the building and how the building is experienced at street level from Bishopsgate, St Helens Place, Copthall and Liverpool Street. The GLA and third-party representations identify harm to a number of immediate townscape views particularly to 52-68 Bishopsgate and St Helens Place Conservation Area where officers acknowledge harm and these are addressed through the report but specifically within the Heritage Section.
127. The split form of the two linked buildings mediates and integrates the changes in scale to the more local context of lower tall buildings such as the Tower 42 and reduces the overall massing and bulk particularly in views from the south. The development has been designed to activate the ground floor and to optimise inclusive public realm through a triple height raised open space under both main tower and the satellite building. The building will provide a new and dramatic but pedestrian scale frontage onto Bishopsgate which will contrast with the historic context of the City's medieval street network, aligning with the 99 Bishopsgate building line as part of a coherent street edge. Active frontages, shops, urban greenery and the attractive architecture will be visible from as far as the junction with Cornhill, and the main thoroughfare and will draw people towards 55 Bishopsgate and beyond. In relation to immediate surrounding streets the development is not considered to comply with London Plan D9(C; 1 a; iii) due to impacts on St Helens Place and 52-68 Bishopsgate and this is considered in more detail in the Heritage section.
128. In relation to D9 (C 1a) there is some conflict with parts i) long range views and iii) immediate views although in many views the development would read as a successful addition to the existing City Cluster of tall buildings.
129. In relation to D9 (C;1b) the proposal has been designed to assist the future evolution and consolidation of the City Cluster. It would assist in assimilating with and developing the Cluster's discreet conical skyline form with a secondary summit stepping up to 22 Bishopsgate / 1 Undershaft in the local and wider context. It would accentuate the important place of the City Cluster in the mental 'mind map' of the City and London, assisting wayfinding and London-wide legibility. The skyline impact is commensurate with a recognition of the importance of the City and the Cluster in the wider historical and socio-economic topographical reading of the Nation's Capital, where the Cluster is symbolic of the original commercial heart of London since Roman times. As assessed elsewhere in this report, at a macro character and identity level, the consolidation of the Cluster which would be achieved will

allow the observer of strategic views to better orientate themselves, assisting in a recognition and appreciation of other strategic London landmarks as part of a more coherent whole. In local views the proposal will assist in consolidating the Cluster form and stepping down from the apex so that its form can be read. As such, it is considered the proposal would reinforce the existing and emerging Cluster of tall buildings, reinforcing the local and wider spatial hierarchy, aiding legibility and wayfinding.

130. The site is located on the northwest side of the City Cluster, a growing and significant group of tall buildings which is an evolution of the historic City skyline. The relationship of the proposal to the composition of the Eastern Cluster has to be carefully considered in long views, intermediate views closer to, and also within the City core. The development is considered to comply with D9 (C 1b) and would reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding.
131. In relation to D9 (C 1c) the architectural quality and materials are exemplary and would be maintained through its life span. This is central to the proposals. The main tower building is inspired by a biometric organic structure – the Fibonacci sequence resulting in a reduced carbon and structurally efficient design. The form is a slender building with a base, middle and tapering crown with a defined convex building shape. Overall, the architecture is clearly well-considered in the round and of a high quality, would be visually distinctive and an attractive addition to the skyline in of itself. The subtle variation in the design between the main and lower satellite buildings is supported and the towers complement each other.
132. In long views the tapered silhouette would be an elegant addition to the skyline. In mid range and closer views the elevational treatment of intersecting curved lines which form an attractive lattice exoskeleton would be readily appreciated which would bring visual interest to the façades. The steel structure and glazing would integrate and complement the language of materials which define the City Cluster of tall buildings. The satellite building is designed as a companion building to the tower. The building shares the same elegant design philosophy and is driven by achieving structural efficiency and carbon reductions. Materials and detailed design would be the subject of conditions to ensure quality is maintained to deliverability on site. The open ground floor undercroft would introduce a human scale at pedestrian level providing a new sheltered public space which will be welcome respite and breathing space within the bustling and dense townscape of Bishopsgate as well as encouraging permeability and pedestrian movement and activity. A complete description and assessment of the development and the public spaces is addressed in the architecture and urban design. The development is considered to comply with D9C 1c)
133. In relation to D9 (C 1 d) a full assessment of impact with regards to heritage assets is detailed in the Heritage section of the report. Officers have identified the following adverse impacts:

- Low levels of less than substantial harm have been found to the significance of Whitehall Court (grade II*), War Office/Ministry of Defence (grade II*), and Horse Guards (Grade I);
 - Low levels of less than substantial harm have been identified to the significance of St Pauls Cathedral (grade I)
 - Low level of less than substantial harm has been found to the significance of 52-68 Bishopsgate (Grade II);
 - Slight levels of less than substantial harm (at the low end of the spectrum) have been found to the significance of St Helen's Place Conservation Area and St James's Park (Grade I Registered Historic Park and Garden);
 - Otherwise, the significance and contribution of setting of a broad range of designated heritage assets would be preserved.
134. The GLA comment that as the proposal would be taller than the surrounding buildings, it would represent a departure from the strategy to reduce building heights at the edge of the tall building cluster. The GLA suggest the applicant should have regard to the comments made by the London Review Panel, to reduce in height, which may assist in reducing harm to heritage assets and improve the development's relationship with the wider Cluster. Historic England also identify a reduction in height might remove harm to heritage assets and would improve the built form of the Cluster when viewed from Waterloo Bridge by stepping more gradually.
135. For the reasons set out in detail in this report, it is considered there is clear and convincing justification for the proposed development. The development optimises the capacity of the site and not least would deliver an important site in the long-term consolidation of the City Cluster and an essential contribution to the provision of required office space. At 31st March 2022, 835,000 sq.m net increase in office floorspace had been delivered since 2016 and a further 576,000 sqm net was under construction or was permitted in the City. A further 589,000 sq.m net is required to meet the draft City Plan target of a minimum of 2 million sq.m net by 2036. The proposed development would deliver nearly 14% of this remaining floorspace target.
136. Since the design inception alternative proposals have been explored and dismissed and the development has been remodelled in form and reduced in height and appearance responding to officer and GLA DRP feedback. These reductions and the gently arcing pinnacle-like form have softened the massing and profile which now integrates more successfully to the City Cluster, whilst seeking to optimise the delivery potential of a strategic site. However, the adverse heritage impacts are not entirely mitigated. To outweigh this harm clear public benefits flow from the development and this is detailed in the planning balance section of the report.
137. In relation to D9 (C 1 d) there is some conflict with this aspect of the policy due to the adverse heritage impacts.

138. In respect of D9 (C 1 e) there will be some, limited, visibility from in and around the Tower of London WHS as demonstrated by HTVIA views 21 (LVMF10A.1) 25 and 26 (Representative of Local Setting Study views). 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, or the ability to appreciate it. This is by reason of its strategic siting within the long-established and consolidating Cluster backdrop, the intervening distance and height when viewed from in and around the Tower of London. The development would comply with D9 (C 1 e)
139. In respect of 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 from 22 Bishopsgate and would not impinge on the stepping down to 20 Fenchurch Street which forms the “prow” of the Cluster and 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 ‘canyon effect’ when seen in association with the London Bridge Cluster, in accordance with D9 (C; 1; f).
140. In respect of D9 (C; 1; g), the proposal would not cause adverse reflected glare, addressed elsewhere in this report, in particular GLA raised issues regarding the potential for glare from flat surfaces that could impact longer range views, including from protected LVMF views. Detailed solar glare assessments were carried out in parallel with the design to ensure the proposals do not generate solar glare effects that pose danger to users of the transport network. Potential for localised glare has been identified to a section of the southern façade of the south building (consistent with schemes on Bishopsgate and Leadenhall with a glazed southern elevation), mitigation of which is through the proposed coating to the glass. Further details are therefore required through a condition to address potential glare issues to ensure compliance with D9 (C; 1; g)
141. 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. The potential light spillage impacts from the proposed development on surrounding existing residential buildings have been assessed and are addressed elsewhere in the report. The development has been designed in accordance with details and technical requirements of the draft Lighting SPD, will be in accordance with the Corporate Lighting Strategy and an informative will be added in terms of following the Considerate Lighting Charter. Further details are required through a condition to address potential glare issues to ensure compliance with D9 (C; 1; h)

Functional Impact:

142. Through the pre-app process and consultation, the internal and external design, including construction detailing, materials and emergency exits have been designed to ensure the safety of all occupants, these issues have been covered in more detail in the architecture and public access and inclusivity section of the report, and are considered to be in accordance with London Plan Policy D9;C;2;a.
143. The proposed servicing strategy would use service vehicle lifts underneath “the satellite building” to minimise the amount of floor space required to create vehicle access to the basement. A vehicle ramp would inevitably require more space and thus was dismissed as an option. The proposed strategy allows for the public realm to perform a variety of functions at different times, creating flexible public realm during the day whilst accommodating vehicle servicing during servicing hours. The “roof” of the service vehicle lift will be finished in Yorkstone paving, and would sit flush with the adjacent floor surface, allowing the space to be used as public realm outside of servicing hours. During servicing hours, when the lift will be in a raised position, external walls would close off the lift itself to avoid conflict between vehicles, pedestrians and cyclists, ensuring safety. The surface treatments, Yorkstone Paving for pedestrian areas and granite setts for the vehicle access route to the vehicle lift, are considered to be high quality. A servicing management strategy will ensure that safety is managed appropriately during servicing hours. The proposals have been assessed 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 in accordance with D9;C;2;b).
144. The open and permeable ground floor of the building, results in an increase in the amount of usable public realm, most of which is positioned along the pedestrian desire line towards the building entrances. The space around the central lift core allows for entrances and access routes to comfortably accommodate peak time use, avoiding unacceptable overcrowding or isolation in the surroundings. Although not part of this application, the ground floor layout allows for future pedestrian connections through adjacent potential development sites. The site has an excellent public transport accessibility rating of 6B, with underground and rail stations in close proximity, as well as numerous bus routes and cycle superhighways nearby in accordance with D9;C;2;c .
145. As discussed in the transport section of the report, there will be an uplift in pedestrian and cyclist activity on the wider transport network, but particularly Bishopsgate, as a result of the development. The impact on the transport network will result in a requirement for the highway to be adapted, which will be assessed and delivered by TfL as part of a section 278 agreement. The needs of all users will need to be considered in detail to inform a revised design for Bishopsgate and other neighbouring streets which accommodates the impact of the proposals. The s106 agreement would require the developer

to enter into a s278 agreement with TfL, and financial contributions will be secured through the s106 by TfL to undertake any necessary works to deliver any highway works to mitigate the impact of the development in accordance with in accordance with D9;C;2;c and London Plan Policy T4 Part C to E

146. In particular, the provision of affordable workspace, cultural space, office floor space and the roof top terrace will promote the creation of jobs, services, facilities and economic activity which will act as a catalyst for future growth and change within the locale in accordance with (D9;C;2;e.)
147. 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).
148. Overall, it is considered the proposal would meet the functional considerations of Policy D9 (C; 2).

Environmental Impact

149. In regard to (D9 3a) the proposals have been found to provide safe and satisfactory levels of wind, daylight and sunlight and temperature conditions will not compromise the comfort and enjoyment of the public realm.
150. The Conservatory in the proposed development at 55 Bishopsgate provides 1,307m² of new green amenity space at the top floor. Assessments demonstrate that a comfortable and managed thermal and moisture environment in the proposed Conservatory can be achieved passively. Assessments included solar and dynamic computer simulations that analysed internal temperatures and humidity under various conditions, including historic and future climate (Climate Change), different occupancy levels and fabric design measures.
151. In regard to (D9 3b-c), the design has given consideration for how the proposals can assist with the dispersal of air pollutants and which 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. Thermal comfort, pollutants dispersal and solar glare are analysed in detail elsewhere in the report.

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

Public Access:

152. The proposal would deliver a new covered public space at ground floor (2344 sqm), further sui generis public spaces at 2nd and 3rd floor level (2545 sqm) and a high-level conservatory and viewing platform (combined 1773 sqm). These would comprise free to enter, publicly accessible areas and their locations would (i) provide a pedestrian experience and amenity at ground floor level designed to connect with future development sites and related public routes and spaces and (ii) 360 degree optimal views over London and the City Cluster with an internal biophilic filled conservatory and additional external viewing platform and (iii) internal spaces for flexible learning/educational and events uses. It is considered that the provision of publicly accessible areas has been optimised in respect of the site's particulars and that the proposal would meet the considerations of Policy D9 (D) as well as Local Plan S19; DM10.3(2) and Emerging City Plan S12(4). The GLA concurs that the proposed conservatory and viewing platform would meet the London Plan policy requirements.

Tall Building, Conclusion:

153. Overall, it is the view of your Officers that the site is considered to be appropriate for a tall building and is a strategic delivery site supporting the consolidation of the City Cluster. As a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9 A, B and D, Local Plan Policy CS 14(1,2, 4), CS7 (1,2 4-7) Emerging City Plan S12 (1,3-6) S21 (1,3-8). There is some conflict with London Plan D9 C (1) (a and d), Local Plan CS 14 (3), CS 7(3) and emerging City Plan S12 (2) and S21 (2) due to adverse impacts on designated heritage assets and protected views. Given the nature of these adverse impacts, it is not considered that the proposal would accord with D9 when read as a whole. This conflict is considered as part of the overall planning balance in the conclusion of the report.

Architecture, Urban Design and Public Realm

Architecture:

154. The proposal would represent an efficient use of land within the City Cluster, following a design-led approach that optimises the site capacity, accommodating significant growth in the core CAZ, providing employment and complementary commercial, cultural and educational uses, supported by additional public space at ground level, the lower floors of the building and the rooftop. On balance, 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.
155. The proposal is at the heart of the strategic function of the City Cluster, to accommodate substantial growth in accordance with Policies CS7 and London Plan Policies SD 4, SD5 and E1. The design response for the new building has been carefully considered with multiple contexts, including at

street level, close up views, relationships with nearby buildings, greater distance views from outside the City, and in relation to the Conservation Areas and existing historic assets surrounding the site.

156. The proposed development would provide 14% of the projected demand for office floor space in the City, and the proposals sought to optimise this delivery in a Plan-led approach which seeks to consolidate the City Cluster, to reduce pressure on more sensitive environments elsewhere. This long-term approach has created an evolving character and context of tall buildings, to which the proposal has been designed to respond. The GLA acknowledge the site would be an appropriate site for high-density, despite some conflict with impacts on heritage and view, 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 City Plan Policy S8.
157. The site lies within the core of the City of London, on the main pedestrian and vehicular north-south route through the Eastern Cluster, occupying a large plot on the western side of Bishopsgate. Immediately to the north is 99 Bishopsgate a lower-rise commercial podium tower. Tower 42 is located immediately to the southwest. There are several other tall buildings in close proximity. These include the Leadenhall Building (No. 122 Leadenhall Street), TwentyTwo (No. 22 Bishopsgate), the Heron Tower (No. 110 Bishopsgate) and 8 Bishopsgate.. These large and tall modern commercial buildings are contrasted with more fragmented surviving remnants of the historic townscape of the City's commercial core: the defining 'genius loci' ('spirit of the place') of the Cluster. The proposal would add to that rich mix of striking juxtapositions.
158. The surrounding area is undergoing considerable redevelopment, with a number of new developments currently under construction, with planning permission, or are within the planning system and under consideration by the City of London. The site is part of a dynamic townscape which is fundamentally shaped by its proximity to other tall buildings, as well as being a pivotal site central to several pedestrian routes connecting key landmarks and destinations across the Square Mile.
159. Fundamentally shaped by the local distinctiveness of the City Cluster, the proposal would comprise architecture of a high quality, mitigated somewhat by the heritage and views conflicts, with outstanding sustainability credentials for a tall building. It would be attractive from different viewpoints and from varied distances and would integrate unique experiential offerings in the form of the proposed public spaces at ground floor, lower ground floor, 2nd and 3rd floor and a roof top conservatory in support of the City's wider 'Destination City' initiative, providing a rich mix of public uses which will enliven the City Cluster as a vibrant, 27/7 destination.

160. The architectural design approach has been amended through the planning process to consider options and strike a balance of meeting the demand for growth and conserving heritage assets. Environmental considerations, specifically wind microclimate, have shaped the architectural response. As a consequence, the main building has been remodelled introducing a softer profile, whilst the height was reduced through pre-application discussions from 309m AOD to 284.68m AOD. The legibility, experience and character of the public offering have been refined and made more adaptable and attractive in response to City and GLA Design Review feedback.
161. The development comprises two connected blocks. A main tall building (63 storeys, 284.68m AOD) and the lower building (22 storeys, 112.30m AOD). These would positively contribute to the emerging City Cluster composition, stepping down in height from 22 Bishopsgate and 1 Undershaft. In long distance views, the faceted upper levels and elegantly tapered profile of the taller building would be distinctive and attractive. The GLA consider the architecture is well considered and of high quality in their Stage 1 letter.
162. The structure, form and articulation of the main tower has been developed around the 'Fibonacci Sequence', which is a "biometric design". The design and character of this proposal was based on the expression of architectural and structural concepts, rooted in the numbering sequences, and the efficient geometry found in nature and natural forms. This dictates the form of the building around the frame and defines the appearance of the building. The structural philosophy of the building is based on maximising structural efficiency, reducing building embodied carbon through efficiently minimising the amount of structure required, whilst expressing the structure externally to enhance the architectural aesthetic.
163. In optimising the site potential, there is some conflict with the setting of St Paul's Cathedral and other designated heritage assets including the Whitehall Buildings in Westminster and this is addressed in the Strategic View and Heritage section. Design refinements have sought to reduce this harm. The building's form and profile has been evolved to provide a softer edge towards St. Paul's compared to the harder geometric forms of existing towers. In the view from Waterloo Bridge and Golden Jubilee/Hungerford Bridge the mid to upper outline of 55 Bishopsgate would appear to arc gently away from the Cathedral's profile. In avoiding sharp, straight-lined contrast, 55 Bishopsgate seeks to soften hard edges and seeks to assimilate more comfortably with the Cathedral. The view of 55 Bishopsgate from St. James Park the tapering crown is a softer form which is inspired by the spires of Whitehall Court.
164. The two built forms complement each other with a shared form and architectural language, including generous ground floor under crofts which provide covered public space, striking angled structural columns which anchor the buildings mass and square floor plates with faceted corners and a narrow palette of glass and metal which reveal defined floor plates. The base is

raised 7m, appearing to be elevated by eight raked bronze finished structural columns which anchor the building, which would be creatively designed to be a feature in the public realm, framing the Bishopsgate entry to the generous open public spaces below the building with the height of the tower and its distinctive rotational symmetry soaring above.

165. The buildings are conjoined on all floors and from 4th- 22nd floor a biophilic wall screens the connection. From the east this reads as a recessed green seam knitting the two parts together and from the west the shared lift core projects from the seam, cloaked in the same modular green wall.
166. The taller block from the 22nd floor to the roof summit has a more complex geometry and independent form, with a diminishing floor plate. The overall building profile expands above the base and tapers towards a 'crown' at the top.
167. The proposed tower uses a hybrid structural system, with a central reinforced concrete core working in tandem with an external mega-frame system to both withstand the lateral wind loads on the building and support the gravity load from the individual floor plates. The design of the structure is an expression of the Fibonacci Sequence, a mathematical concept that underpins several theories of mathematics and computer science, applied to the exoskeleton of the building through a striking arcing structural latticework, creating sculpted and faceted façades which would be appreciated in both short and long distance views. The architectural form would introduce a refreshingly elegant design which would enrich the 'hypermodern' architectural language of the existing and emerging city cluster with its distinctive large, glazed elevations acting as backdrops or foils against which the more historic architecture of the area is perceived.
168. The satellite building is a subtle variation of the main building, the height and form are supported by the GLA. The design is in part a response to microclimatic conditions, the building's form is optimised for wind mitigation and is connected with the main tower on all levels. This is achieved through key design moves, such as, the addition of an integrated canopy element, and a radius applied to the building's corners. The building is also raised up above the ground on eight circular columns to facilitate movement and permeability through the site. Constructed using a steel frame, the gravity support system consists of predominantly vertical columns supporting steel and composite floor plates. At the base of the satellite building, a belt truss is used to transfer the vertical column system into a triangulated column system to distribute the load to four points. This transfer system allows the satellite building to land on the ground floor with minimal structure, so as to not adversely affect the wind flows around the base of the site.
169. Both buildings offer flexible commercial floor space, cultural uses, a public roof top conservatory and curated ground floor public realm with a secluded

garden. This mix of uses would create an enhanced and more socially and economically inclusive place. The public and private functions are prominent, well defined and legible, comfortable for users and would provide much needed respite within the dense high intensity environment of Bishopsgate where public spaces for relaxation and leisure are at present limited.

170. Circulation and public access points to lifts and staircase are prominently positioned and are designed to be fully inclusive. The double height fully open undercroft to both buildings would be central to the public perception that this is a place for people. The public realm has been designed as a simple plane that follows the CoL palette of materials, to make it feel as part of an extension of the street. Subtle changes of paving patterns will define the different spaces. A variety of seating areas with greenery will be placed around the building to create different characters around the core of the building and to reinforce the sense of place. The ground floor public space would serve as an orientation hub for the cultural elements of the scheme connecting a series of publicly accessible areas across the development through dedicated lifts and staircases.
171. The double grand escalators flanking the core clearly denote access to the commercial office spaces and the entry reception point at level 1. Future office trends and work patterns for the post-Covid 19 period, suggests that it will be the amenity and experience of the workplace, as well as the public setting and environment of the urban context, which will be key to attracting people to re-energise the City's economy. This is central to the design at 55 Bishopsgate. Floor plates and circulation have also been space planned around flexibility with the ability to support range of tenancy splits and requirements.
172. The building includes publicly accessible spaces at Level 02 and 03 that could cater for a range of uses. Clear entrances, wayfinding and signage would make this uses legible and accessible to all. The cultural non-commercial offer would be outwardly expressed within the architecture and evident from the public realm with a simpler glazing system providing good visibility into the potential theatre space to entice users and add visual interest to the active lower levels of the building.
173. The zenith, or top, of the building takes form in the conservatory and public viewing platform spaces, which would command the tower apex, and be a public marker in wider London views. With planted garden spaces and exceptional views of London, the tower's crown would provide a platform for rich experiences of nature culture. This would be a new London destination offering panoramic views, organizing events, in a new horticultural experience for the city. The conservatory has been designed to welcome all generations, to create a sense of surprise, a 'wow' factor, and to encourage engagement throughout the year, drawing people back to visit repeatedly. Planting will transform the space throughout the seasons, and flexible spaces will allow for programmed events to occur. The conservatory has a main paved route

around the space to allow the visitor to take in an impressive overall first impression. This will be coupled with smaller routes through the planting, which will lead the visitor to discover richer fauna and planting arrangements, and a more intimate series of spaces. The conservatory is surmounted by an external viewing platform which would be the grand finale for the experience.

174. The façades are an integrated element of both buildings, designed to respond to the high sustainability requirements comprising an efficient steel structure and triple glazed closed cavity system. Materials on the main facades are a narrow palette of metal and glazing and the GLA notes the steel structure and glazing complements the City skyline and assist assimilation in the overall Cluster form. At ground level materials would appropriately be more diverse, softer, richer, textured and decorative, providing visual interest for pedestrians and users: comprising a timber lattice soffit, porcelain and brick core, bronze clad steel, perforated panels and plentiful urban greening.
175. The architectural finishes, materials and design detail at ground would be expressive, enticing and interactive, and would include a dynamic slatted soffit with flexible lighting and the core which would act as a canvas for wayfinding, public art and kiosks. The columns would be striking architectural anchors whilst also incorporating seating and urban greening. The public space is designed with flexibility in mind and the acoustic quality, microclimate and proposed infrastructure could support a range of activities from a tranquil sculpture garden to an events space.
176. The elegance of the tower and companion satellite building, coupled with the people focussed ground floor and cultural offer through the building would create a rich and humane tall building, all in accordance with London Plan policy D3, Local Plan policies CS 10, DM10.1, DM10.3 and emerging City Plan 2040 S8.
177. The conservatory is constituted by a single-skin façade system, topped by a glazed rooflight on a steel structure inclined towards the centre, characterised by localised openings for natural ventilation. Double glazed insulating glass is used on the curtain walling and rooflight, to reduce condensation during the winter months. The double glazing allows a coating for solar control and is compatible with the tree planting in the inner space. The satellite building would follow a similar design approach addressing solar gain, the mechanical plant is located at roof level contained within the envelope of the building to reduce prominence. The external roof top/ terrace is effectively the fifth elevation, there is a considered and integrated design approach to both building's roofscape, in accordance with Local Plan policy DM 10.1 and draft City Plan 2040 policy S8.
178. Facade maintenance and cleaning have been considered. There are three tracked Building Maintenance Units (BMUs) with an approximate outreach of 20 meters integrated within the top portion of the high-rise to allow external

access to the curtain wall system that clad the Tower from level 61 downwards. An independent tracked BMU is located at the top of the Satellite Building, would be able to provide full external access to the façades in this area. To reduce visibility from the ground level and the surrounding buildings, a lifting table is introduced to move the machine vertically and hide it when parked. When not in use, all BMUs would not be visible. Cleaning and maintenance of the façades that clad the Conservatory are carried out via one of the three BMUs on level 61 which can reach the above single-skin curtain wall system up to the edge of the glazed skylight at roof level. The access operations to the glazed skylight are provided by a fall restraint system. The systems are designed to be visually integrated into the architectural form when non- operational.

179. The form of the building has been inspired by a biometric design informed by highly efficient natural structures tapering upwards and reducing structural mass and carbon through the building from the ground to the pinnacle. Limiting solar gain has been key to the low energy approach of the façade design. A smart active system has been used on the main extent of the cladding, consisting of a double-skin façade with automated blinds controlled via external sensors, integrated in the cavity between the inner double-glazed insulating glass and the outer single-glazed skin. The blinds play a key role in relation to solar control of the overall façade system. A blind deployment strategy has been developed to efficiently reduce solar gains into the office spaces, resulting in substantial improvements in energy consumption, hence considerable reduction in operational carbon emissions.
180. In addition to solar control, the façade has been designed to bring benefit in relation to glare whilst maximising daylight and the views out of the building. Optimisation of views and daylight have been considered fundamental factors to the façade design approach, to ensure human comfort and wellness of the occupants.
181. Air slots with weather louvres have been incorporated into the thermally insulated spandrel zone of the vertical double-skin curtain wall system on each floor, designed to comply with the façade's requirement related to water tightness as well as to ensure adequate air intake and a degree of and discharge for the correct operation of the Mechanical Ventilation and Heat Recovery (MHVR) units.
182. The development is considered to be an exemplary architectural response to a complicated site that has been designed with sustainably, microclimate, streets, people and spaces in mind and presents an innovative design solution which makes an effective use of limited resources. In the majority of visual experiences, the bulk, height, massing and quality of materials and detailed design approach are appropriate to the character of the City and will deliver a unique and distinctive addition to the City Cluster. Notwithstanding the exceptional architectural response to the site the proposal would draw

some conflict with aspects of Local Plan design policies CS10(1), DM10.1, emerging City Plan Policy S8 (9), DE2 and London Plan Policy D3 (D;11) and this balance is considered in paragraph 209.

Urban Design and Public Realm

183. The proposal would create a destination for a broad demographic, with a mix of uses and activities. It would be accessible and welcoming to all, reachable from numerous public transport interchanges with prominent and legible entrances for pedestrians and cyclists. The proposal would have excellent public transport connectivity, with many public bus, tube and train stations in close proximity and over 1500 cycle parking spaces, thereby making it possible for a majority of visitors to walk, cycle or use public transport to access the site, 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.
184. The layout of the ground plane, with its arrangement of routes, spaces and uses will generate activity on an island site which currently has no public realm at ground floor level. Two pedestrian routes, either side of the main lift core, would take pedestrians to an enclosed and tranquil garden at the western boundary of the application site. The siting and design of the dwell space to the rear, enclosed by greening and a water feature, would create a high quality amenity space for both the public and the occupants of the building. The site has also been designed to allow for future connections to additional public realm as the Cluster consolidates. The edges of the building is open at ground floor level with double and triple height openings creating a generous volume, which would enable views into and through to surrounding public spaces. The design and appearance of the proposals have been developed as a welcoming public space in approaches along Bishopsgate. The cantilever alleviates some of the microclimatic impacts of a tall building and would generally create spaces that are comfortable for standing and sitting. Furthermore, the landscaping has been designed to be flexible and adaptable to accommodate the creation of future routes and spaces towards the periphery of the site.
185. The routes through the site respond to pedestrian desire lines and sightlines which would facilitate pedestrian movement to the entrances and around the site. The provision of cycle storage in the public realm and a cycle lift to the parking in the basement would prioritise the needs of active travellers and provide high quality facilities to support and encourage active travel. The attractive routes and public spaces have paid particular attention to meet the needs of pedestrians and cyclists.
186. Bishopsgate would be opened up to new public-facing, permeable, visually interesting and well-lit public space, which would provide a good level of

interest and passive surveillance to the street. The large amount of lifts and circulation space required puts a limit on the available space for active ground floor uses facing Bishopsgate, though the proposals are considered to make adequate provision of publicly accessible uses on the lower floors of the building to animate the lower levels.

187. In terms of active frontage there would be retail, alongside entrances to the publicly accessible spaces, with wayfinding and signposting to other publicly accessible areas. The proposed digital wall would create an interesting and vibrant atmosphere in the public realm which would support the cultural uses, creating a 'welcome mat', or marker, defining the arrival experience for visitors. The curation, programming and mixed use nature of the proposals would result in a public realm which functions at different times of day and on different days of the week, appealing to a range of audiences and attracting a diverse range of users to the site. The provision of shaded dwell space, with drinking fountains and a retail offer would create an environment where people can meet, dwell and rest.
188. The entrances to publicly accessible spaces would be prominent and visible to passers by, access and circulation to the viewing gallery, event spaces, co-working space, cycle storage and retail kiosks, have been thoughtfully positioned to be obvious and legible to users, with appropriate signage and wayfinding measures to ensure entrances are clearly legible, the details of which are reserved for condition.
189. As discussed in the 'functional impact of a tall building' section, building servicing has been optimised with consideration of the site constraints, specifically the enclosed nature of the site, the building could only be accessed by vehicles from Bishopsgate.
190. The proposed servicing strategy would use service vehicle lifts underneath "the satellite building", allowing the public realm to perform a variety of functions, to accommodate pedestrian movement outside of servicing hours and provide service vehicle access during servicing hours. When not in operation, the vehicle lift would be finished in the same materials as the adjacent public realm and would appear as an extension of the walking surface. The proposed servicing vehicle lift avoids the need for a large and enclosed service vehicle yard at ground floor level. The service vehicle lifts allow the public realm to perform a variety of functions at different times of the day.
191. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality, without disturbance or inconvenience of the surrounding public realm. The service vehicle lifts would have an internal 'cage', which sits inside the lift itself and would be suppressed below ground when the lift is not in operation, this would minimise any potential conflict between pedestrians and vehicles when the lift

is in use, in addition, a banksman would be used to manage vehicle movements and ensure safety.

192. Hostile Vehicle Mitigation (HVM) has been sensitively incorporated to the base of the northern tower, through the use of HVM compliant planters which incorporate seating. The provision of seating would improve comfort for pedestrians travelling along Bishopsgate and would provide a rare opportunity to rest.
193. The opening up of the base of the building would improve PCL ratings along the site frontage from a range of C to B-, up to B- to A-. Beyond the site frontage, pedestrian and cycle movement would increase, it is likely that the increase in pedestrian footfall generated by the development would require mitigation works to take place to Bishopsgate, a TfL road, as part of a s278 agreement with TfL, any required mitigation measures would be assessed in greater detail to inform necessary works required to potentially widen footways, provide cycle lanes, revise pedestrian crossing arrangements and enhance the quality of the public realm in addition to the highway works to alter existing crossings, provide a dropped kerb for the service vehicle access and reposition the bus stop on Bishopsgate.
194. The overall form, massing, openness of the base of the building, disposition of public realm, detailed design and landscaping approach have been designed to optimise microclimatic conditions, including delivering optimal wind and thermal comfort conditions, whilst canopies and oversailing is creatively used for dramatic effect, whilst providing shading and protection from inclement weather, enhancing open spaces and views in accordance with London Plan Policy D3 and City Plan Policy S8.
195. The use of Yorkstone paving in the public realm would read as a continuation of the surface treatment on the adjacent pedestrian route around Tower 42. As part of the s278 agreement with TfL, the west side of Bishopsgate in the vicinity of the site would be resurfaced in Yorkstone, creating a consistency in the design and appearance of the adjacent streets and the public spaces. This would suggest to pedestrians that the space is publicly accessible, encouraging pedestrian movement around the base of the building. Vehicular access to the vehicle lift would be denoted by granite setts which sit level with the adjacent surface, this would clearly mark where vehicles are supposed to go when the service lift is in operation. The new public realm would be a seamless extension of the City's continuous public realm, utilising the material palette and detail established in the City Public Realm SPD and the associated Technical Guide, with final detail reserved for condition.
196. The soffit, columns, elevations and hard landscaping have been carefully designed to create a coordinated and harmonised look and feel for the space, with attractive bronze columns, a decorative timber soffit and brick piers infilled with decorative ceramic panels to dress the exterior of the lift core. The columns are an integral part of the HVM strategy, and would have perforated

infill panels to the columns to make them attractive and less utilitarian in appearance. The 3 dimensional wood lattice work on the soffit would have low level back lit LED lighting throughout to emit a broad spectrum of light, a mixture of blue, green and red wavelengths that the ground level planting requires for photosynthesis. The planters and seating would be made of concrete and finished in timber, with final details reserved for condition.

197. The retail kiosks have been designed to be flexible and adaptable, made from a lightweight timber structure it they could be altered and adapted easily to support the needs of a range of potential occupiers, the kiosks would also have access to infrastructure for utilities. By maximising the adaptability of the kiosks, an increased number of diverse vendors can be catered for which will enhance the overall vibrancy and appeal of the urban realm. Furthermore, the kiosks could be moved and altered as the public space evolves. The flexibility of the kiosks is considered to be positive.
198. The elevations of the lift core would be finished with brick piers and embossed decorative panels, and lined with the retail kiosks, animating what would otherwise be an inactive elevation. The overall materiality of the public realm and lower floors of the building would have a coordinated design aesthetic and overall the proposals are considered to be acceptable.
199. The publicly accessible 'interiors' at basement, ground and upper levels would complement the public realm, which would include cultural curation and programming secured via the Cultural Implementation Strategy, building on the City's range of inclusive and accessible buildings. Altogether, the proposals would provide more pedestrian-focused space which promote active travel and are comfortable, convenient and attractive, in accordance with London Plan Policy D3 and City Plan Policy S8.
200. An appropriate management, curation and programming of the public realm, both internal and external, would be ensured via section 106. A Public Realm Management Plan and Cultural Implementation Strategy, will ensure the spaces achieve the highest standard of inclusive design for a diverse range of users, whilst ensuring that appropriate management arrangements are in place which maximise public access and minimise rules governing the space in accordance with London Plan Policy D8(H) and guidance in the (draft) Public London Charter.
201. An outline architectural lighting strategy has been submitted which shows that lighting would be subtly integrated into the facades at various locations, chiefly focused on the public areas at ground floor, internally at 2nd and 3rd floor and internally within the building's crown. The proposals include opportunities to use lighting creatively for special effects, events, installations and art pieces focussed on the ground floor and other public spaces. 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 in the

Corporate Lighting Strategy. Full details of the building's lighting would be secured via condition.

202. DM 10.2 of the Local Plan and S8(7) of the emerging City Plan and London Plan Policy G5 requires major development proposals to contribute to the greening of by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage. The delivery of urban greening can be challenging for a tall building. The site is identified as an area deficient in in public open space within the London Green infrastructure map. Currently proposals include trees and planters to Bishopsgate, planters and soft landscaping within the public realm at ground floor, an extensive green wall covering the linking section between the main tower and the satellite building and an internal 500sqm conservatory. Urban greening is detailed further in the Urban Greening section of the report. The proposed urban greening is well designed and contributes to the overall quality and character of the proposed building, and is considered to be compliant with London Plan policies D3 and D8
203. The development would provide free publicly step free from ground accessible toilets at lower ground level (4 unisex ambulant superloos, 2 unisex fully accessible rooms), and on level 61 (2 unisex ambulant superloos 4 unisex superloos 1 unisex fully accessible room). Additional facilities are located on level 3. Collectively these would be suitable for a range of users including disabled users, families with young children and people of all gender identities. The final details to secure a suitable level of choice and range of toilet facilities, 24 hour access, signage and strategy for management and cleaning would be required within a S106. The intentions of the proposals would comply with Local Plan, DM22.2, Emerging City Plan HL6, S1 and London Plan Policy S6
204. A drinking fountaining would be located within the public realm. This is considered an appropriate location due to the high levels of pedestrian activity and would support and improve public health, reduce waste from single-use plastic bottles and supports the circular economy through the use of reusable water bottles. This aspect would be secured within the final landscape and public realm proposals and the management would be secured through a S106. This would comply with Emerging Policy S1 Health and Inclusive City, London Plan D8 (O) all support the provision and future management of free drinking water at appropriate locations in the new or redeveloped public.
205. A signage and wayfinding strategy would be required as a condition responsive to the various zones and activities across the development including private and public functions including the ground floor public space, circulation and public functions including 2nd and 3rd floor and to the roof top conservatory. A wrap around digital screen is proposed at ground floor as a dynamic and prominent feature wall providing a striking physical presence.

Proposals would be required to comply with CS 10(7), DM 10.5 of the Local Plan and S8 (12) of the emerging City Plan 2040.

Design Conclusion:

206. The proposal amounts to a complex and high-quality piece of design in 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.
207. It is recognised that there is some conflict with heritage aspects of design policies Local Plan CS10, DM10.1, emerging City Plan Policy S8 (9), DE2 and London Plan Policy D3 (11) and these impacts are detailed more thoroughly in the Heritage section of the report. It is considered the design policy pulls two ways, with some conflict and a significant amount of positive, in broad design terms. It is a balance when coming to optimise strategic sites.
208. Overall, on balance, it is considered the proposal would optimise the use of land, delivering high quality office space, and a multi-layered series of flexible cultural opportunities externally and through the buildings. 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. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies CS10 and DM 10.1, emerging City Plan Policy S8 and DE2, London Plan D3 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-6.

Strategic Views

209. 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:

210. The impact of the proposal 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); and to a lesser extent v.) concentric defences vi.) surviving medieval remains and vii.) physical (historical) associative evidence.

211. 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.
212. The WHS Management Plan establishes a 'local setting areas', 'immediate settings' 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 wider setting. The Local Setting Study identifies 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.
213. Historic Royal Palaces, Historic England and the LB of Tower Hamlets have been consulted and have not identified harm to the ToL and its OUV.
214. The GLA refer to THVIA views 20, 23 25, 26 which show the impact of the proposed development to the setting of the Tower of London World Heritage Site and the associated group of listed buildings. The GLA comments "the proposed development appears as part of a cluster of modern taller buildings in these views and the harm caused to the setting is considered to be at the low end of the less than substantial scale." The GLA response would suggest that visibility of the development in itself generates harm, and the GLA Stage 1 report contains no assessment of the impact on the seven attributes, and their components, of OUV.
215. 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 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.

216. The intervisibility between the ToL WHS and the commercial core of the City, over which it was intended to command and defend from the River approach, is an integral part of, in particular, the attributes I.) landmark siting (and the component: the Tower's relationship with the City) ii.) symbol of Norman power iii.) the physical dominance (of the White Tower) and iv.) the concentric defences (including the component: visual linkage with the surrounding cityscape, demonstrating use and function). Officers are strongly of the view that, *per se*, intervisibility, or the evolution of the relationship between the City and the Tower through the consolidation of the plan-led Cluster, is not inherently harmful, and could even be a positive facet, requiring case-by-case consideration.
217. 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:

218. The proposal would have an indirect impact, via change in the wider setting of the WHS.

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

219. 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.
220. 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). The GLA have not identified harm in this view to the OUV of the ToL.
221. 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.

222. 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).
223. 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. In baseline views a very small part of the upper storeys of the proposed development would be glimpsed immersed into the existing tapering Cluster profile, to the right 22 Bishopsgate. In the cumulative scenario, it would be all but occluded by the consent at 1 Undershaft, which will form the (higher) apex of the Cluster.
224. Situated at a distance from the orientation 'pivot' of the view on the Monument, it would leave undiminished the Monument as an important landmark element and would not affect the skyline presence or pre-eminence of those other landmark elements: City Hall, HMS Belfast or a recognition and appreciation of St Paul's as a Strategically Important Landmark (SIL). It would preserve their strong group value with other elements allow for an appreciation of the scale and geography of London, in accordance with para 185 of the LVMF SPG.
225. The proposal, in accordance with para 187, would continue the consolidation of the City Cluster, adding considerably to the character and stature of the view, relating well to the City Cluster as an emerging singular skyline form. In relation to the ToL WHS, the proposal would continue the long-term consolidation of that relationship, recognised at para 186. Strategically-sited in the Cluster, it would preserve the skyline of the White Tower, whilst still allowing for some visual separation of the White Tower from the Cluster, in accordance with para 186.
226. 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).
227. The consolidation of the Cluster into a more coherent, clear and discreet form, contrasting with the preeminent tower in the foreground setting of the River

will, in principle, reinforce and make more legible the relationship between two related skyline identities. This is important to an understanding and appreciation of OUV. The tower, and its concentric defences, will still read as a powerful defensive structure strategically sited presiding over the River, controlling access to and defending the commercial core of the City, which was its core function, while the openness of the Liberties, reenforcing a sense of being set apart, and not lost in, the City will continue to be reinforced, in particular via development stepping down to the scale of the Liberties and a large open expanse of sky around the tower.

228. In the sequential kinetic approach across Tower Bridge (LSS View 9 and Approach 14), the LSS (pg 101), also recognises the value of these views of the City and the ToL, here seen in juxtaposition. It acknowledges of particular importance the landmark siting on the Thames “in relation to the City beyond”, and that the view is of great diversity and character. At no point would the proposal in the kinetic experience erode silhouette or significant sky space around or behind the tower, and for most of the bridge experience would be set at a significant distance from the ToL, ensuring it still reads as a riverside gateway to the City beyond and is on the edge of, and not lost in, the City, in which it still reads as more prominent than the buildings surrounding it and its military architecture can be appreciated, in accordance with the core guidance in the LSS.
229. Overall, in baseline and cumulative the proposal would preserve the characteristics and composition and landmark elements of the view as a whole as well as the 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 any visual impacts would be negligible.
230. Thus, it is considered that the proposal would preserve those core attributes of OUV (and their relevant components), which have been identified in accordance with Local Plan Policy CS12, CS13 (3) Emerging City Plan Policy S11, HE1, HE3 London Plan Policy HC2 HC4 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG.
231. LVMF 25A.1-3 – Townscape View, Queen’s Walk:
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 focuses on axis with the White Tower, which also benefits from a dynamically protected sky 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 a core 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, reflects 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.

232. The GLA have identified harm to the setting of ToL at the low end of less than substantial harm from this LVMF view point 25A.1 reference THVIA View 20. In the baseline and cumulative scenarios, the proposal would be almost entirely obscured behind 22 Bishopsgate, to which the GLA did not raise objections and existing buildings within the City Cluster. Only a very small part of the upper storeys would be partially discernible to the right of the Cluster above 1 Undershaft within the kinetic viewing experience. This would be a very limited part of the building and would not alter the composition of the view in any material way the visual change to composition of the cluster would be negligible.
233. 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 not result in any harm to the setting of the WHS or its OUV.
234. 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).
235. The consolidation of the Cluster into a more coherent, clear and discreet form, contrasting with the preeminent tower in the foreground setting of the River will, in principle, reinforce and make more legible the relationship between two related skyline identities. 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 preserving the relationship with the River, the City, and the iconic form, silhouette and 'dominance' of the White Tower.

236. 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).
237. Overall, in baseline and cumulative views the proposal would preserve characteristics and composition of the view as a whole, as well as the landmark elements, and the 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 considered that the proposal would preserve those core attributes of OUV (and their relevant components), which have been identified in accordance with Local Plan Policy CS12, CS13 (3) Emerging City Plan Policy S11, HE1, HE3 London Plan Policy HC2 HC4 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG.

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

238. 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 and provides views to the rising ground of Greenwich and the cluster of towers at Canary Wharf.
239. The proposal would appear at the western extremity of these views. In the baseline and cumulative views the development would be seen beyond the body of No. 22 Bishopsgate in this view from Tower Bridge. The upper half of the tower is visible, with its western side obscured by the neighbouring building. The tower sits below the ridgeline of the tallest building in the centre of the cluster and creates a transition down to Tower 42 and the buildings lining the river bank. The articulation of the buildings envelope with its gradually tapering form and visual detail provided by the glazed frame accentuates its profile and slenderness. The proposal visually integrates with the cluster and consolidates its form on the skyline.
240. 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 well as Tower Bridge and HMS Belfast within the LVMF SPG.
241. 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).

242. The consolidation of the Cluster into a more coherent, clear and discreet form, contrasting with the preeminent tower in the foreground setting of the River will, in principle, reinforce and make more legible the relationship between two related skyline identities. Given its siting, the proposal would not affect the clear sky backdrop of the White Tower's four turrets and castellations, having a neutral impact on and thus preserving all those relevant attributes of OUV and those associated components including 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.
243. Overall, in baseline and cumulative views the proposal would preserve characteristics and composition of the view as a whole, and landmark elements, as well as the 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 considered that the proposal would preserve those core attributes of OUV (and their relevant components), which have been identified in accordance with Local Plan Policy CS12, CS13 (3) Emerging City Plan Policy S11, HE1, HE3 London Plan Policy HC2 HC4 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG.

Other World Heritage Site Views:

244. 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 (South) and (North) ; these impacts are found in the submitted THVIA views 23, 25 , C31 in addition to view 26 from Tower Bridge Approach.

Inner Ward:

245. 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.

246. The LSS states that there is a range of views from within the Inner Ward; these have been assessed in a three-dimensional model, in addition to the submitted HTVIA views. View 23 in the THVIA is not one of the identified viewing's locations but is located within close proximity to View 1 of the Local Setting Study which is View 24 in the THVIA where the development would not be visible.
247. The GLA have identified harm to the setting of the ToL when viewed from here at the low end of less than substantial harm. In the baseline scenario the proposal would, from a significant part of Tower Green and the Scaffold Site, be concealed by ToL perimeter buildings or intervening buildings within the City Cluster having no visual impact. In View 24 the proposal would be very marginally visible, appearing in the gap between the 52 Lime Street and the pollarded tree which is situated on Tower Green. The majority of the proposal remains occluded from view by interposing development comprising St Peter ad Vincula and the buildings of the Eastern Cluster. Subsequently, only a minor element of its upper storeys are visible. In this context, the proposal is seen as a barely discernible addition to the existing tall building context which would be peripheral to the viewing experience. In cumulative scenario 1 Undershaft would entirely occlude the development in the view.
248. It would assist in the consolidation of the Cluster of a singular backdrop form, set away from the unique sense of place in the tower foreground. The consolidation of the Cluster into a more coherent, clear and discreet form, contrasting with the preeminent tower in the foreground setting of the River will, in principle, reinforce and make more legible the relationship between two related skyline identities.
249. Given its siting, the proposal would not affect the clear sky backdrop of the White Tower's four turrets and castellations, having a neutral impact on and thus preserving all those relevant attributes of OUV and those associated components including the relationship with the River, the City, and the iconic form, silhouette and 'dominance' of the White Tower.
250. 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. 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 (South):

251. 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, 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.
252. The GLA have identified harm to the setting of ToL in HTVIA View 25 at the low end of less than substantial harm. In the baseline scenario the proposed development appears, very marginally visible above 52 Lime Street and distinctly lower than 22 Bishopsgate and in baseline scenarios would be a negligible addition to the existing cluster of tall buildings which mark the proximity of the City beyond. The transparent glazing and sculptural form would integrate seamlessly with the modern City Cluster. From this location, the cumulative scheme at 1 Undershaft would appear in front of the proposal and completely occlude it from view.
253. It would assist in the consolidation of the Cluster of a singular backdrop form, set away from the unique sense of place in the tower foreground. 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.
254. 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):

255. 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.

256. In HTVIA View 31 the proposal would appear in the background centre of the emerging City Cluster. In the baseline scenario it would consolidate its distinct form, positioned between 22 Bishopsgate and 40 Leadenhall, in cumulative scenarios the development would be screened by 1 Undershaft. The development would preserve the existing relationship of the City Cluster with the ToL and preserve the pre-eminence of concentric defences in these views, all in accordance with the guidance.

Other Views of the ToL:

257. 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 northern pavement of Tower Bridge Approach is within Tower Bridge Conservation Area and demonstrates the relationship between the emerging City Cluster in the background and the ToL which towers over the immediate foreground.
258. The GLA have identified harm to the setting of ToL in this HTVIA View 26 at the low end of less than substantial harm. In this view, the proposal would reinforce the relationship between the two distinct urban forms – the Cluster in the background and the ToL ensemble controlling the foreground, causing no harm. The proposed development would be visible within the backdrop of the view and would introduce a new built form to the City Cluster. The proposals would be seen over some distance and would be tightly emmeshed in the cluster stepping down to the right of 22 Bishopsgate appearing at similar scale to the 1 Leadenhall Building. In baseline scenarios the development would consolidate the composition of the existing Cluster. In cumulative scenarios the development would be entirely concealed by 1 Undershaft. The development would preserve the existing relationship of the City Cluster with the ToL, and preserve the pre-eminence of the White Tower, the iconic sky-etched silhouette and concentric defences in these views, all in accordance with the guidance.

Conclusion – Impact on the Tower of London World Heritage Site

259. 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.
260. It is acknowledged that GLA found a low level of less than substantial harm to the WHS, attribute considerable importance and substantial weight to the views of the Mayor and the GLA, 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 neutral 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.

261. Officers conclude 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 Local Plan Policy CS12, CS13 (3) Emerging City Plan Policy S11, HE1, HE3 London Plan Policy HC2 and HC4 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG. Historic Royal Palaces (HRP) raise no objections to impacts.

Other London View Management Framework Impacts:

262. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the Capital's identity and character at a strategic level.
263. 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.
264. 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.

The development would not be visible from., LVMF 12A Southwark Bridge; LVMF 18 Westminster Bridge; LVMF 20 Victoria Embankment between Waterloo and Westminster Bridges; LVMF 21 Jubilee Gardens and Thames side in front of County Hall, LVMF 22; Albert Embankment between

Westminster and Lambeth Bridges along Thames Path near St Thomas's Hospital. These views are not assessed.

London Panoramas

265. Due to the height the proposal would be visible, from all the London Panorama Assessment Points.
266. 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.

1A.1-2, Alexandra Palace Viewing Terrace London Panorama:

267. This 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 proposed development appears in the background of the view, sited on the northern side of the City cluster, appearing partially in front of 22 Bishopsgate and just to the east of Tower 42. Given its position on the northern side of the Cluster, the building would be legible as a distinct element, silhouette. The tower's pinnacle-like, tapering form would provide an attractive contrast to the geometric steps of 22 Bishopsgate beyond and presents a softer edge which reduces the sheer effect of 22 Bishopsgate, stepping down and giving the Cluster form a greater three-dimensional quality. The light materiality of the building's envelope aids its integration into the Cluster to the south albeit the contrasting frame helps to accentuate the development.
268. In the cumulative scenario, the City cluster would expand quite considerably to the east and west of the Proposed Development, with 1 Undershaft becoming the new centre point at 73 storeys. New tall buildings to the east and west of the site would reinforce the symmetry and compositional quality of the Cluster. The proposed development would retain its central and largely unobscured position within the cluster.
269. In baseline and cumulative scenarios the proposal 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 lower density residential of the mid-ground and the 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 Kentish and Surrey 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.

270. The proposal would preserve the characteristics and composition of the identified landmark elements: the London Eye, BT Tower and The Shard. It would also leave unaffected views of other identified features: the Caledonian Market Tower, Canary Wharf, Broadgate Tower, the London Bridge Cluster, St Pancras Station and the Euston Tower. It would create a new feature of interest in its own right.

271. The proposal would result in a minor enhancement to the view overall.

2A.1-2 and 2B, Parliament Hill London Panorama:

272. 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.

273. In baseline scenarios the development would be visible within the view, sited immediately to the west of 22 Bishopsgate and within the body of the lower towers forming the City Cluster. The building would be legible as a distinct element within the view. The gently tapering form contributes to the building's slender and elegant profile, its upper half is experienced against a clear sky background. This effect is enhanced by its visual separation from 22 Bishopsgate to the east by virtue of a narrow sky corridor. The scale of the building steps down from 22 Bishopsgate as the focal point of the cluster.

274. In the cumulative scenario the proposal would assist in cementing further the consolidation of a clear, attractive conical form of the Cluster. It would continue to step down from the intended summit at 1 Undershaft, which would contain London's highest public viewing gallery. The distinct public realm in the 'crown' of 55 Bishopsgate would remain visible, as would its distinct silhouette, whilst the architectural expression and appearance would allow it to harmonise visually into a familial, singular cluster form. It would reinforce the central axis of the Cluster, from which it would fall away on all sides, creating a legible and attractive skyline form.

275. In baseline and cumulative scenarios, the siting of the proposal in the City Cluster means there would be no impact on the 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. 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 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.

276. The proposal would preserve the characteristics and composition of the identified landmark elements: the BT Tower and the Shard. It would also leave unaffected views of other identified features: the Caledonian Market Tower, Canary Wharf, Broadgate Tower, the London Bridge Cluster, St Pancras Station, 30 St Mary Axe, Heron Tower, Tower 42 and the Euston Tower. It would create a new feature of interest in its own right.

277. The proposal would result in a modest enhancement to the view overall.

3A.1, Kenwood at the viewing gazebo London Panorama:

278. This is another Hampstead Heath view from one 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 an eye-catching 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.

279. In baseline experiences the proposed development would be a noticeable addition to the visual experience from the location of the former viewing gazebo, the slender form of the tall building sited immediately to the west of 22 Bishopsgate and defined to the east by the Gherkin. As in other long-distance views towards the site, the proposed development would be legible as a distinct element within the view. The elegant taper of the building's form and unobscured visibility of the upper half of the tower would be experienced against a clear sky background. The narrow sky corridor separating the development from 22 Bishopsgate to the west, would increase or decrease dependent on the viewpoint although the individual forms of each building would remain clearly legible as part of an overarching whole.

280. There would be no impact would be no impact on the protected vistas towards the two SILs, St Paul's and the Palace of Westminster. It is again 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. Like the view from Parliament Hill in cumulative scenarios the development would be back-dropped by the consented taller 1 Undershaft. The presence of this building, the tallest within the City cluster, beyond 55 Bishopsgate would enclose the sky corridor with the neighbouring 22 Bishopsgate and the development would no longer be seen against a clear sky background. However the proposed development would remain legible in the view as it is located on the northern side of the cluster and the upper part of the building's northern elevation would remain unobscured.
281. 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). 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).
282. In the cumulative scenario the proposal would assist in cementing further the consolidation of a clear, attractive conical form of the Cluster. It would continue to step down from the intended summit at 1 Undershaft, which would contain London's highest public viewing gallery. The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG.
283. The proposal would preserve the characteristics and composition of the identified landmark elements: the London Eye, BT Tower and the Shard. It would also leave unaffected views of other identified features: the Broadgate Tower, 30 St Mary Axe, Guy's Hospital, Centre Point and Euston Tower. It would create a new feature of interest in its own right.
284. The proposal would result in a minor enhancement to the view overall.

4A.1-2, Primrose Hill summit, London Panorama:

285. This 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.

286. The proposed development would be a noticeable addition to the view, sited just to the north of No. 22 Bishopsgate. The upper half of the building would be seen against a clear sky background which in time is likely to narrow with future development. The elegant proportions and slenderness of the proposed tower would be clearly appreciated in this view. The gradual tapering form of the building, the sweeping curves of its external frame and the lightness of its architectural materiality would provide an attractive contrast to the more geometric 22 Bishopsgate. The proposed development would provide a gentle step down from the tallest element creating a tapering effect to the northern side of the Cluster which would consolidate the conical compositional quality of the Cluster on skyline. In the cumulative scenarios the development would be experienced alongside further consented tall building schemes including the tallest consent at 1 Undershaft. The development would contribute to the evolving form the cluster as part of a wider family of taller buildings.
287. 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 scale of the development would be compatible with the composition of the view and would consolidate the City Cluster of tall buildings as an existing landscape feature in accordance with para 130 of the SPG. This would assist in differentiating it from the consolidating Ise of Dogs Cluster in the background, assisting in an appreciation of the scale and depth of London. Due to the location within the cluster would not change or affect an appreciation of St Paul's in the view from Primrose Hill.
288. In the cumulative scenario the proposal would assist in cementing further the consolidation of a clear, attractive conical form of the Cluster. It would continue to step down from the intended summit at 1 Undershaft, which would contain London's highest public viewing gallery. The distinct public realm in the 'crown' of 55 Bishopsgate would remain visible, as would its distinct silhouette, whilst the architectural expression and appearance would allow it to harmonise visually into a familial, singular cluster form. The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG.
289. The proposal would preserve the characteristics and composition of the identified landmark elements: the BT Tower and the Shard. It would also leave unaffected views of other identified features: Canary Wharf, University College Hospital, Centre Point, Westminster Cathedral and the Euston Tower. It would create a new feature of interest in its own right.

290. The proposal would result in a minor enhancement to the view overall.

5A.1-2, Greenwich Park General Wolfe Statue London Panorama:

291. This 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).
292. The proposed development would be a noticeable addition to the view from Greenwich Park, the upper half of the building appearing against a clear sky background within the central part of the City Cluster. The new building would provide a clear and legible transition stepping up to 22 Bishopsgate at the centre of the Cluster. The Gherkin and lower towers to the east of the site create a transition in scale down from the proposed development, creating a more legible conical composition of buildings viewed against the skyline. The development would be clearly defined from other towers within the Cluster, whilst assisting in consolidating the Cluster as a distinct, singular skyline form. The lightweight materiality of the proposed development would soften its appearance within the view contrasting with other more robust and solid constructions in the cluster. The articulation of the building with distinctive glazed frame creates visual interest in the view and reflects the architectural quality of the tower.
293. In the cumulative scenarios, 1 Undershaft would bridge the sky gap between 55 and 22 Bishopsgate, and marginally overlap with the western part of the proposed development within the view. This would temper the prominence of the proposed development in the view, although its form would be integrated more subtly into the cluster. As a tall building the development would remain legible in the view, its southern elevation fully unobscured. The proposal would assist in cementing further the consolidation of a clear, attractive conical form of the Cluster. It would continue to step down from the intended summit at 1 Undershaft, which would contain London's highest public viewing gallery. The distinct public realm in the 'crown' of 55 Bishopsgate would remain visible, as would its distinct silhouette, whilst the architectural expression and appearance would allow it to harmonise visually into a familial, singular cluster form. It would reinforce the central axis of the Cluster, from which it would fall away on all sides.
294. 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, whilst preserving the ability to appreciate St Paul's, Tower Bridge and the Monument, experienced in part against the distant Highgate/Hampstead ridgeline. In the cumulative scenario the proposal would assist in cementing further the consolidation of a clear, attractive conical form of the Cluster. It would continue to step down from the intended summit at 1 Undershaft, which would contain London's highest public viewing gallery. The distinct public realm in the 'crown' of 55 Bishopsgate would remain visible, as would its distinct silhouette, whilst the architectural expression and appearance would allow it to harmonise visually into a familial, singular cluster form.

295. 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.
296. The proposal would preserve the characteristics and composition of the identified landmark elements: the Monument, Tower Bridge, Millennium Dome and the Greenwich Observatory. It would also leave unaffected views of other identified features: Canary Wharf. It would create a new feature of interest in its own right.
297. The proposal would result in a minor/modest enhancement to the view overall.

6A.1 Blackheath Point, London Panorama:

298. This panoramic viewpoint is on high ground of historic strategic importance on a historic route from the Kent coast and the continent and would have been the first sighting 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. Tower Bridge and The Old Bailey (6A.1).
299. The proposed development would be a noticeable addition to the view from Blackheath Point, the building appearing against a clear sky background within the central part of the City Cluster. The building would be clearly distinguished from 22 Bishopsgate. The new building would provide a clear and legible transition in scale stepping up to 22 Bishopsgate at the centre of the cluster. The Gherkin and lower towers to the east of the site would create a transition in scale stepping down from the proposed development, creating a more consolidated and coherent composition of buildings. The elegant and slender skyline profile could be appreciated as part of a more coherent Cluster form. The lightweight materiality of the proposed development would soften its appearance within the view and provides a contrast to more robust and solid constructions in the Cluster, with which it will have a familial relationship.

300. In the cumulative scenarios the proposed development would be almost wholly obscured by 1 Undershaft and 100 Leadenhall Street. A slither of the building's roof form may appear above the ridgeline of 100 Leadenhall Street but across this distance the proposed development would not be readily discernible. The proposal would assist in cementing further the consolidation of a clear, attractive conical form of the Cluster. It would continue to step down from the intended summit at 1 Undershaft, which would contain London's highest public viewing gallery. The distinct public realm in the 'crown' of 55 Bishopsgate would remain visible, as would its distinct silhouette, whilst the architectural expression and appearance would allow it to harmonise visually into a familial, singular cluster form.
301. As at Greenwich, the development would assist in the consolidation of the City Cluster as a coherent skyline form assisting the composition and characteristics of the view overall and would contribute positively to the conical form and family of very tall buildings. The proposal would be 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.
302. The proposal would preserve the characteristics and composition of the identified landmark elements: Tower Bridge, the Old Bailey and the Shard. It would also leave unaffected views of other identified features: St Paul's Church (Deptford), Guy's Hospital and Canary Wharf. It would create a new feature of interest in its own right.
303. The proposal would result in a minor/modest enhancement to the view overall.

LVMF River Prospects:

LVMF 13 A- B.1 River Prospect - Millennium Bridge:

304. This stretch of the river has a distinct character being directly opposite St Paul's Cathedral as the Strategically Important Landmark and is one of best places to appreciate the Cathedral at close quarters. The Cathedral dominates the middle ground of the view where the architectural details and embellishment and cornice line can be enjoyed. The monumental silhouette rises above a low horizontal skyline relieved by the wider 'Wrenscape' skyline of steeples and spires. The City cluster is peripheral to the right of the view where Tower 42 is just visible.

305. In baseline scenarios the proposal would be on the right periphery of the views and would complement and contribute to the development of the existing and emerging Cluster of tall buildings due to the elegant and distinctively tapered silhouette. The development appears on the periphery the view within the western part of the City cluster and would not crowd in too close. The upper third of the tower appears above the roofline of Tower 42. Its lower levels are wholly obscured. The proposal would be clearly within the City Cluster and detached from the context of the Cathedral. There would be no impact on the skyline character, elements within the view and the Cathedrals dominance and details would be preserved.
306. In the cumulative context, the City cluster expands and new tall buildings on the eastern and southern sides of the cluster serve to bridge the visual gap between the main body of the cluster and the 52 Lime Street and 20 Fenchurch Street. The emerging new tall buildings would not change the extent of visibility of the development, of which the upper levels remain unobscured and the distinction between the low scale of old historic City and the modern city cluster would be maintained.
307. The proposal would preserve the characteristics and composition of the identified landmark elements, St Pauls' Cathedral and Millennium Bridge and would leave preserved an appreciation of those other features Unilever House Faraday House, 200 Aldersgate Barbican Towers Church of St Benet Paul's Wharf, Church of St Mary Somerset, St Nicholas Cole Abbey, Church of St Mary le Bow Church of St Mary Aldermanbury, Church of St James Garlickhithe, Church of St Michael Paternoster Royal : It would still allow for the juxtaposition between important elements, such as the Cathedral and the historic riverside setting and those key landmarks so that they could still be appreciated in their London context.
308. The proposal would preserve 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 228-237 and 57 of the SPG.

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

309. LVMF 15B comprises two assessment points, 15B.1 and 15B.2 and encompasses the kinetic experience in-between. It is an iconic London view with important views east towards St Paul's Cathedral and the City of London. St Paul's Cathedral is identified as the SIL. There is a clear, long-established relationship between the Cathedral and the City Cluster as two distinct forms with space between them which is integral to the composition as a whole. The Cathedral the pre-eminent monument with clear sky around it, rising above, atop Ludgate Hill, a lower riparian setting of historic buildings and landscapes. The modern tall buildings of the City Cluster form the background to the right, demarcating the central financial district. An important characteristic of the City Cluster in these views is it rises gradually in height from its left edge in deference to the Cathedral.

310. From 15B.1, in baseline and cumulative scenarios, the proposal would be somewhat visually separated from the Cluster and the tallest building, 22 Bishopsgate, which accentuate the prominence of the two. However, Tower 42,100 Bishopsgate and Heron Tower would assist in mitigating the apparent scale of the proposal, and creating a finer grain edge as is intended of the consolidating Cluster. The proposal would have the visual effect of drawing the Cluster closer to the Cathedral, eroding further space of the integral sky gap between it and the Cluster, creating a secondary summit, which will challenge and compete with the pre-eminence of the Cathedral. The slight stepping down from the apex at 22 Bishopsgate would mitigate the impact, starting a deferential fall towards the Cathedral, as would the orientation and form of the proposal. The northern 'threshold' moment on the bridge, at 15B.1, is where the proposal is most harmful.
311. As the viewer transitions south and towards 15B.2 (and beyond), the Cluster moves away from the Cathedral, opening up the strategic skyline gap between the City Cluster and a clustering of taller buildings to the north, and the impact becomes lesser, but not insignificant.
312. The LVMF guidance states that new development should not dominate the Cathedral or compromise its relationship with the clear sky backdrop. The guidance also states that development in the Cluster should be of an appropriate height and of high architectural merit (para 263). Officers consider, in of itself, the proposed tower is an attractive skyline feature of good design, and that the slight stepping down in height from the apex makes a response to the overall form of the Cluster.
313. The proposal would not affect St Pauls clear sky silhouette, but would draw tall buildings closer to the Cathedral, impinging on its clear sky backdrop, causing somewhat of a 'canyon effect' around the Cathedral, in particular from the northern end of the Bridge and 15B.1. This would in part close the strategic sky gap, beginning to dominate the Cathedral. This would be contrary to para 264/66/67 of the LVMF SPG.
314. This closing of the integral strategic sky gap and relative scale relationship would cause some erosion of the characteristics and composition of the view, as a whole, and would diminish the ability to appreciate, more than recognise, the Cathedral as the SIL.
315. The essential character of LVMF 15B.1- 2 would be retained at night-time, with the contrast between the modern towers within the City cluster and the illuminated dome and peristyle of St Paul's Cathedral. The river itself provides a layer of darkness animated with pockets of light which contrast with the geometric forms of the buildings as they rise above the riverbank. The proposal has been designed to minimise light pollution from internal and

external lighting including the roof top conservatory, which is inherent in the façade, and will be secured in detail via condition, including aviation lights. There will be no other form of external lighting that will be visible in these views. The development has been designed in accordance with the details and technical requirements of the draft Lighting SPD and the Corporate Lighting Strategy. Overall, lighting will be managed to ensure the development would not command the focus in the City Cluster or distract unduly from other elements of the composition.

316. Otherwise, the proposal would preserve the characteristics and composition of the identified landmark elements, Somerset House and the Shard, and would preserve an appreciation of those other features: Temple Gardens, St Bride's Church, the Barbican Towers, The Old Bailey, Tower 42, St Mary Axe, Heron Tower, the Tate Modern, IPC Tower, ITV Tower and the Royal National Theatre. It would still allow for the juxtaposition between important elements, such as the Cathedral and the historic riverside setting (Temples, Victoria Embankment, the Monument and Wren Churches), and those other key landmarks so that they could still be appreciated in their London context.
317. However, the proposals would depart from the guidance in paras 264-267 of the LVMF SPG. This inconsistency with LVMF guidance has also been identified by Historic England, the GLA, the Surveyor to St Pauls Cathedral, Westminster City Council, and other objectors.

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

318. The view comprises two Assessment Points located close together on the viewing platform both orientated towards St Pauls Cathedral. The Cathedral is identified as the Strategically Important Landmark (SIL) and the guidance identifies the City Cluster as a group of tall buildings in the east of the composition. The Oxo Tower is a landmark in the view and Unilever House, St Brides Church, Tower 42, 30 St Mary Axe and Heron Tower are also in the view. There has been a third-party objection to the proposed height and bulk and the impact on this view.
319. The viewing platform provides a distinct view position from which to appreciate St Paul's Cathedral and its wider setting. The Cathedral is particularly dominant in the view and is appreciated at close quarters, its principal features and detail appreciable. The immediate setting is safeguarded by St Paul's Height limitations. Tower 42 and the City Cluster forms the skyline in the east. The river dominates the foreground, while the middle ground consists of mature trees leading from Temple towards the buildings on the Embankment near Blackfriars Bridge. Buildings between these provide a rich and intricate skyline and there is a transition in scale from the Westminster section to the City section further east.
320. In baseline scenarios the proposal would contribute to the City Cluster, introducing a distinctive and elegant new tall building assisting in the long-

term consolidation of the Cluster composition as a more singular skyline set piece. Although the proposal would bring the taller elements of the Cluster closer to the Cathedral and would reduce the existing sky gap, it is considered that the proposal would retain primacy of the Cathedral, and the proposals would accord with para 280 of the LVMF, preserving the townscape setting of the Cathedral.

321. In cumulative scenarios, the City Cluster would consolidate further into a singular, separate form from the Cathedral. The emerging new tall buildings would not change the extent of visibility of the development, of which the upper levels would remain unobscured and the distinction between the low scale of old historic City and the modern city cluster would be maintained.
322. In baseline and cumulative scenarios the proposal would not affect the primacy of the Cathedral's clear sky silhouette or impact on ability to appreciate the three-dimensional qualities and architectural details of the SIL. The development would assist in the consolidation of the City Cluster as a coherent skyline form assisting the composition and characteristics of the view overall and would contribute positively to the conical form familial, singular character of the Cluster. The proposal would be consistent with the general want to consolidate tall buildings at para 57 of the LVMF SPG, avoiding more sensitive aspects of the wider view and allowing for greater understanding of the wider landscape setting of London.
323. The proposal would also preserve the characteristics and composition of the identified landmark elements, and those key landmarks so that they could still be appreciated in their London context St Paul's Cathedral and The Oxo Tower. It would leave preserved an appreciation of those other features: Temple Gardens, St Bride's Church, Unilever House, Tower 42, 30 St Mary Axe, Heron Tower and IPC Tower. It would still allow for the juxtaposition between important elements, such as the Cathedral and the historic riverside setting so that they could be appreciated in their London context. It would create a new feature in its own right.
324. The proposal would preserve 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.

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

325. LVMF view 17B.1 and 17 B.2 is a kinetic viewing experience between the two Assessment Points from the Golden Jubilee / Hungerford Footbridges looking downstream with St Paul's the Strategically Important Landmark the centrepiece of the view. The footbridge provides enhanced viewing experiences to the east owing to the elevated viewing location. The LVMF guidance identifies the setting of St Paul's Cathedral within the view as the

singular most important structure which should be preserved or enhanced. Para 300 of the LVMF SPG identifies clusters of tall buildings either side of the Cathedral including the City Cluster and para 302 states new development should strengthen the composition of the existing Clusters.

326. Westminster City Council (WCC) and third-party representations raise objections to the impact on this view. WCC have identified that the height and location of the proposal result in an abrupt transition and consider neither the setting of the Cathedral preserved, or the City Cluster composition strengthened and contend that the current proposal does not achieve the LVMF objectives.
327. As in the views from the LVMF15B.1-2, the siting and orientation of the proposed development, in baseline and cumulative scenarios, means that there would be a gap between 22 Bishopsgate which would accentuate the prominence of both, albeit this would be lesser as the Cluster consolidated. The proposal would be prominent in the view, eroding the sky gap between the Cathedral and the Cluster and creating a more assertive edge, mitigated by the stepping down from 22 Bishopsgate. The proposal would also introduce a distinctive and elegant new tall building to the City Cluster composition and reinforce the presence of the Cluster on the skyline. As above at Waterloo, the siting, form and appearance relative to the Cluster would mitigate the harmful impact but would not remove it.
328. It is recognised that the proposal would bring the City Cluster closer to the Cathedral and would slightly diminish the existing strategic sky gap which is integral to the composition as a whole. In this case the diminishment in the sky gap and relative scale relationship would not be as significant or such a direct challenge on the primacy of the Cathedral as in LVMF 15 B.1-2. due to distance and orientation. However, there would be some slight diminishment overall to the composition, the result of a diminishment of an appreciation, more so than a recognition, of the Cathedral as the SIL. To this end, it would conflict with para 301 of the LVMF SPG, which seeks to preserve the setting of St Paul's as the singular most important structure.
329. Otherwise, the proposal would preserve the characteristics and composition of the identified landmark elements: Somerset House, Cleopatras Needle, Waterloo Bridge, St Bride's Church, Royal National Theatre, Royal Festival Hall and the Shard. It would preserve an appreciation of those other features: the Shell Mex House, Brettenham House, the Fleche of the Royal Courts of Justice, Barbican Towers, Dome of the Old Bailey, Tower 42, 30 St Mary Axe, Heron Tower and IPC Tower. It would still allow for the juxtaposition between important elements, such as the Cathedral and the historic riverside setting and those key landmarks so that they could still be appreciated in their London context.

330. However, the proposals would depart from the guidance in para 301. This inconsistency with LVMF guidance has also been identified by Westminster City Council, and other objectors.

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

331. This is a kinetic sequence between the two Assessment Points, with the focus of the view 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 in 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.
332. The proposed development in baseline and cumulative scenarios is a noticeable feature in the view, appearing against a clear sky background above the roofline of Tower 42 and No.100 Bishopsgate within the City Cluster. The upper third of the proposed building is visible, with a small sliver of the tower's body visible in the gap between the two towers the Site sits beyond. The proposal would assist in the consolidation of the City Cluster into a coherent skyline form with a stronger identity, in accordance with the aim to consolidate existing clusters in the visual guidance (para 57).
333. The proposal would preserve the characteristics and composition of the identified landmark elements, The Palace of Westminster, Towers of Westminster Abbey Whitehall Court, The London Eye, Westminster Bridge and Victoria Tower Gardens and would leave preserved an appreciation of those other features: the BT Tower, Centre Point Embankment Place Shell Mex House, County Hall, St Thomas's Hospital, Tower 42, 30 St Mary Axe, Heron Tower and IPC Tower. It would still allow for the juxtaposition between important elements, such as the Cathedral and the historic riverside setting and those key landmarks so that they could still be appreciated in their London context.
334. The proposal would preserve the townscape setting of The Palace of Westminster whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 334-338 and 57 of the SPG..

Townscape views

LVMF 26A.1 Townscape St James Park Bridge:

335. LVMF View 26A.1 is a single Assessment Point from just south of the centre point of the 'Blue Bridge', orientated towards Horse Guards Parade and the

central foreground fountain and the Foreign and Commonwealth Office between the 'pivot' of the central 'Duck Island'.

336. This view is quintessentially picturesque and derives its character from the high-quality landscaped setting of St James's Park relative to the groups of buildings. The foreground and middle ground are dominated by the lake and surrounding parkland. The densely foliated Duck Island is in the centre of the view with two groups of buildings with distinct architectural characters either side experienced between trees. To the left is the skyline of spires and pinnacles of Horse Guards and Whitehall Court (grade I and II*), identified as landmarks in the view, as well as the Old War Office (grade II*, although not identified in the view). The Foreign and Commonwealth Office (grade I) and the Shell Centre are also landmarks, alongside the London Eye, and have a more geometric form and a larger scale. This juxtaposition of these elements characterises this historic parkland in an important city location where no single building dominates.
337. Beyond the tree line of Duck Island to the east, the forms of modern tall buildings are discernible, including 22 Bishopsgate and the Leadenhall Building in the City Cluster, and One Blackfriars, and Southbank Tower and One Blackfriars (LB Southwark). The latter two buildings are heavily filtered by the mature trees and are not a prominent or noticeable feature of the view. 22 Bishopsgate is more prominent, appearing beyond the tree canopy and above the roofline of the Old War Office, albeit obscured by the pre-eminent foreground landscape setting. The presence of the tall buildings has the effect of bringing the wider urban context closer to the view, and a greater sense of awareness of the wider London context.
338. The proposed new development in baseline and cumulative scenarios would rise prominently to the left of 22 Bishopsgate in the background behind, but to the right of the aforementioned Victorian skyline of spires and pinnacles and to the left of the trees of Duck Island. The new building backdrops, in part, one of the secondary southern roof pitches of Whitehall Court. The impacts have been tested through summer, in winter and at night (HTVIA 8,9.1,9.2 and 9.3), as well as from different locations across the Bridge.
339. The visual management guidance anticipated background development, which is now a clear part of the view and the principal groups of Victorian buildings either side of the Duck Island are read in juxtaposition with backdrop clusters of taller buildings: the City Cluster, the Blackfriars Cluster (LB Southwark) and the Waterloo Cluster (LB Lambeth). At the core of managing the Townscape Views, London Plan Policy HC4, seeks development which allows buildings or groups of buildings of architectural/cultural significance, to be seen in conjunction with the surrounding environment, including distant buildings, as is the case here. New development should be of a high standard of execution (LVMF SPG, para 75), and should preserve or enhance the characteristics and composition of the view. Indeed, the guidance is explicit that development should not breach the tree canopy profile of the Duck

Island, which the proposal would not, and that new buildings should appear as part of the existing groups.

340. The proposal has been designed as a complementary pinnacle architectural form – one pleasingly curvilinear in subtle contrast to the more geometric forms of the historic ensemble. It is strategically sited, as part of a distinct consolidating City Cluster skyline form, set aside from, and still subservient to, the pre-eminent Whitehall composition. It would bookend the City Cluster, its complementary pinnacle architectural form no higher than, and set at a regular distance between, the principal turrets, whose intricate silhouettes would still hold the middle ground. The ‘softer’, more reflective material character of the distant tower, in contrast to the more solid, weighty material character of the historic group, offers further subservience. In bookending the Cluster, the principal sky-etched silhouette of Whitehall Court would be, on the whole, preserved. It would have an architectural dialogue with the Horse Guards ensemble having regard for the picturesque qualities of these landmark elements, with particular regard for roofline, materials, shape and silhouette, in accordance with para 431 of the LVMF SPG.
341. However, the height and scale of the proposal, would cause some tension, and compete with, the Whitehall Court / Horse Guards / War Office group, whilst remaining subservient to the strong landscape setting, causing some conflict with the visual management guidance, para 431.
342. The views are equally enjoyed in daytime and night-time. The essential character of LVMF 26A is retained at night-time, with the historic buildings at Horse Guards Parade, Whitehall Court and the Foreign and Commonwealth Office experienced in the verdant water setting. Mature trees filter the elevations of the buildings, creating pockets of light and dark across the water. The distinct built forms within the view are identified by different lighting schemes. The most prominent is the London Eye, identified by the bright lighting against the background of the view. The listed buildings within the view are largely in darkness although the illuminated clock face of Horse Guards is a bright feature. Tall buildings in the wider urban context are visible in the background of the view, noticeable beyond the mature trees on Duck Island which have a screening effect. Their lit-up forms reinforce awareness of the central London location, although these do not form a focal point of the view, and neither would the proposal.
343. The proposal has been designed to minimise light pollution from internal and external lighting including the roof top conservatory, which is inherent in the façade, and will be secured in detail via condition including aviation lights. There will be no other form of external lighting visible from here. The development has been designed in accordance with details and technical requirements of the draft Lighting SPD and will be in accordance with the

Corporate Lighting Strategy. Overall, lighting will be managed to ensure the development would not command the focus in the view or distract unduly from other elements of the composition.

344. The proposal would preserve the characteristics and composition of the identified landmark elements, The London Eye, the Foreign Office and the Shell Centre tower, whilst also allowing for the juxtaposition between picturesque landscape and historic features, by day and night, so that they could still be appreciated in their London context.
345. However, the proposals would depart from the guidance in paras 431. This inconsistency with LVMF guidance has also been identified by the Historic England, the GLA, Westminster City Council, and other objectors.
346. Historic England conclude the proposals challenge the LVMF guidance for this view as the proposed tower would breach the skyline to the Duck Island adding cumulatively to harm caused by previously built towers. WCC note the development would rise prominently in the background and erode the skyline and picturesque qualities of the view and contend that the impact of the proposal would not adhere to the LVMF guidance.
347. GLA Officers (para 47 Stage 1 letter) did not object to the impact on this view or identify a noncompliance with the SPG considering “the development is likely to meet the requirements of buildings appearing in the background of this view”. It was considered that the tapered form references the spires of Whitehall Court and therefore relates well to the existing group of buildings, whilst the architecture was considered of high quality. However, it considered that the building is still taller than most buildings and therefore relatively prominent within this view despite the fact it sits slightly apart from them. Therefore, it identified a risk that it begins to compete with the adjacent buildings. This was considered a particular concern when considering the impact on this view at night-time given the extent of glazing proposed.
348. Officers conclude the architectural quality of the tall building would be exceptional, having regard to roofline, materials, shape and silhouette, while responding to the spires and pinnacles of the listed buildings and in part complies with paragraph 75 and 431. However, the location and height of the tall building within the view would be inconsistent with other objectives in paragraph 431. The development would appear prominently relative to the viewer’s experience of the historic group of buildings on Whitehall, competing with them.
349. Officers conclude that the development would to a degree distract from the architectural and cultural significance of this townscape view as a set piece and the development would not, on the whole, enhance the characteristics or

composition of the view. The development would be inconsistent with the LVMF SPG guidance paragraphs 77,78 and 431.

Summary of LVMF Impacts

350. On balance, whilst there would be some minor to modest enhancement to certain views, the proposals would fail to enhance the characteristics and composition of views 15B, 17B and 26A, in the case of 26A, failing to preserve the composition of landmark elements, while at 15B and 17B failing to preserve an ability to recognise and appreciate St Paul's Cathedral, as the Strategically Important Landmark. As a background element in these views, the proposal would be prominent to their detriment. In terms of those River Prospects, it would diminish the juxtaposition between St Paul's and the City Cluster, whilst otherwise preserving the relationship between the river frontages and key landmarks. Lighting will be managed to ensure the development would not command the focus within these views or distract unduly from other elements of the composition and after dark the development would be overall less impactful and prominent. The proposal would fail London Plan Policy HC4, Local Plan Policy CS13 and emerging City Plan 2040 Policy S13.

City of London Strategic Views:

Monument Views

351. 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:

352. 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.
353. 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.
354. The proposal would allow an unbroken view north along Gracechurch Street/Bishopsgate towards Gibson Hall and would clearly step down from the main apex of the Cluster but be largely screened by 22 Bishopsgate. 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

355. 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'.
356. 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 northeast 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.
357. In views from Tower Bridge (along Monument Street axis, the proposal would be viewed as part of the consolidating Cluster and largely screened by existing and emerging tall buildings. 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 and the proposal would be peripheral to that experience. 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.
358. 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.
359. 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 largely screened by 22 Bishopsgate. 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:

360. 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:

361. The proposal would not be visible and would be out of scope of many 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 Tower Bridge to Hungerford Bridge in particular in those orientated towards the Cathedral between Hungerford and Millennium Bridges.
362. 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.
363. From the Processional Route the envelope and been designed to avoid any erosion of sky silhouette and space afforded to the Cathedral, thus ensuring pre-eminence in this viewing experience of state and royal significance.
364. From the Thames Bridges, Tower Bridge to London Bridge and along the South Bank (Butlers Wharf) the development is largely concealed by 22 Bishopsgate. Further west from Blackfriars Bridge and along the South Bank the Cathedral is seen in relation to the City's eastern cluster of tall buildings. The cluster appears to the right of the Cathedral and does not intrude into its backdrop. There is a clear gap on the skyline between the Cathedral and the cluster. The height and massing of buildings in the cluster step upwards from this gap in baseline and cumulative scenarios. This is important to the visual relationship between the Cathedral and the cluster, and so should be maintained. In these visual experiences the proposal has been designed to preserve this approach and contributes to the stepping down from the summit of the Cluster at 22 Bishopsgate/1 Undershaft. Moving further west towards Hungerford Bridge the separation between the proposed development and 22 Bishopsgate becomes more apparent and a sub cluster is formed pulling the centre of gravity of taller buildings closer to the Cathedral. This encroachment of a taller building towards the Cathedral is most visually apparent from the mid points spanning across the river particularly from Waterloo Bridge and this impact would challenge the primacy of St Paul's Cathedral and to a lesser extent there would be a slight diminishment from Golden Jubilee/ Hungerford Bridge. In other views along the South Bank the Cathedral would remain prominent and distinct due to the south bank orientation and how the skyline composition is experienced.

365. 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.
366. Overall, the proposal has been designed to protect and enhance local views of St Paul's Cathedral, its setting and backdrop. From Waterloo Bridge and Hungerford Bridge there would be a more apparent change in the relationship between the Cluster and the Cathedral. This would result in an erosion in the setting of the Cathedral. In these experiences there would be a degree of inconsistency 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 "The 'Sky Garden' at 20 and 22 Bishopsgate, New Change, Tate Gallery

367. 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.
368. 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 this view point the building would sit tightly in the cluster and be almost entirely screened by 22 Bishopsgate. The cumulative scenario would show the cascading steeping from 1 Undershaft and would remain screened. The proposals are therefore considered to preserve the public enjoyment in views from the Garden.
369. From 1 New Change southwest of the site. St Paul's Cathedral is the primary viewing experience, and the city cluster is more peripheral. The proposed development would be prominent as an elegant silhouette and expand the city cluster to the north. In baseline and cumulative scenarios, the development represents a further addition to an already established tall building context and remains secondary in the view. There would be no impact on the spire of St Mary le Bow. The overall viewing experience would be preserved.
370. From the emerging 120 Fleet Street, the proposal would appear prominently inserted in the cluster and sit alongside 22 Bishopsgate with Tower 42 and lower mid height buildings stepping down in the foreground. Its tapered

silhouette, glass and latticed architecture would clearly position the building as part of the cluster but its form offers a distinct and elegant addition. The buildings would preserve views of St Paul's Cathedral and the processional route and would allow the two to be read together as a dynamic City skyline experience.

371. From the viewing gallery at the Blavatnik Building within the Tate Modern the proposals will appear within the City Cluster, situated to the left of 22 Bishopsgate and behind Tower 42. In baseline and cumulative scenarios, the proposed development creates a transition down from 22 Bishopsgate as the tallest building in the collection of towers, mirroring the transitional role of 1 Leadenhall in this particular experience. The proposal would not affect an appreciation of other key aspects of the skyline from here, including St Paul's. The visual amenity of the viewing gallery is therefore considered to be preserved.
372. From the emerging internal public terrace at 6-8 Bishopsgate, there would be a different visually close up perspective of the building. This terrace is in the heart of a forest of tall buildings in the city cluster. In views north 22 Bishopsgate is immediately adjacent to the terrace and the proposed development would peep behind revealing its tapered form, glazed and abstract lattice framework. The development would preserve a 180 degree experience taking in Broadgate, views towards Alexandra Palace and the Hampstead/Highgate Ridge and across the City to the west and south. This would offer the viewer an immersive experience within the City Cluster and a thrilling sensation of almost being able to touch surrounding tall buildings. The viewing experience would be preserved.

Other Borough Strategic Views:

London Borough of Lambeth Local Views

373. 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: C.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 viii.) View N and E from Royal National Theatre terraces to the North Bank of the Thames including St Paul's Cathedral and D xvi.) View NE from the Queen's Walk to St Paul's Cathedral between Waterloo Bridge and borough boundary with Southwark.

374. In the distant panorama views (Ci-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) is the striking juxtaposition of the Church tower of St Luke's and the distant City Cluster beyond, which 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, adding to the richness of the cityscape and its visual juxtaposition in these views and would be a minor enhancement.
375. In terms of viii.) View N and E from Royal National Theatre terraces to the North Bank of the Thames including St Paul's Cathedral the South Bank towards St Paul's Cathedral and View xvi.) is towards the NE from the Queen's Walk to St Paul's Cathedral between Waterloo Bridge and borough boundary with Southwark. The Proposed Development would be visually separated from the tallest building in the cluster, No.22 Bishopsgate. This visual separation enables the stepping down from the tallest element to the lower towers within the western edge of the cluster. The curved form of the proposed tower would provide visual interest and variety on the city skyline. The development would assist in consolidating the overall Cluster form and would reinforce its compositional contrast to the Cathedral, which would retain its prominence. The proposal would thus preserve and be a minor enhancement to these views.
376. Panorama View ix) from Queen Elizabeth Hall Roof Garden the proposal would be visible but peripheral to the visual experience and from x) Level 4 Royal Festival Hall Terrace the development would not be visible.
377. Overall, it is considered the proposal would protect (and enhance) the general composition and character of these Local Views.
378. There has been no response from the London Borough of Lambeth.

London Borough of Southwark:

379. 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). The development would; be behind the viewer in View 5 (the townscape view south from the centre of Millennium Bridge). These would be preserved.
380. 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 being the tall buildings at Blackfriars Road, the Elephant, the City of London and at London Bridge, where it finds the Shard assists 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 is 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 tower trio silhouetted in composition against those backdrop hills, demarcating one of Europe's premier cultural centres. In baseline and cumulative scenarios, the development would largely be screened by other buildings in the Cluster, but would assist in consolidating its form as an important landmark, a very minor benefit.
381. View 2 (Nunhead Cemetery) The linear view from Nunhead Cemetery provides a tight, focussed view of St Paul's Cathedral from one of Southwark's most historic locations that is fully-framed by mature trees. St Paul's Cathedral is set prominently in the centre of the view. The lantern, dome, drum and peristyle are all clearly visible, alongside the Western front and towers. Guy's Cancer Centre sits adjacent to the Drum of the Cathedral in the mid ground. The development would not be visible in this view.
382. View 3 (Camberwell Road) The linear view from Camberwell Road provides a northward view along Camberwell Road with St Paul's Cathedral as focal point at the centre of the view. The Cathedral's dome and peristyle are clearly visible above the existing middle ground townscape and create a distinctive silhouette with clear sky on both sides. The development would not be visible in this view.

383. 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 stepping down to the right of 22 Bishopsgate 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 be a minor enhancement to 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.

384. 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.

385. There has been no response from the London Borough of Southwark

London Borough of Islington:

386. 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, 7 or 8, which would be preserved.

387. 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 foliate 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. Where visible, (more prominently in Winter) the Proposed Development is seen as a subtle addition to the existing buildings which comprise the Eastern Cluster, to the right hand side of the frame. It integrates into the existing townscape given its similarity of form and architectural style, remaining

subservient to the datum height established by 22 Bishopsgate and 1 Undershaft.

388. Overall, the proposal would protect Views 1, 2, 3, 4, 6, 7 and 8, while protecting and enhancing View 4 and 5 in accordance with Policy DM 2.4.
389. There from the London Brough of Islington have responded and no objections are raised in relation to Local Views.

City of Westminster:

390. 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 V42(A) (Waterloo Bridge, downstream) and V43 (A)(Hungerford Bridge, downstream), 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).
391. Westminster City Council objects to this proposal and believe the proposal will be harmful to WCC historic townscape views which includes V42 (A), V 43 (A), V34 and V22.
392. View V21 from Victoria Embankment looking east along the embankment is an unusual view of the dome of St Paul's, un-encumbered by other structures, which are screened out by the tree canopies. The draft SPD notes the background of this view is sensitive to the impact from high buildings in the Bishopsgate, Shoreditch and Spitalfields areas. To the right of the dome is the City Cluster which has expanded and is now part of the composition postdating the draft WCC SPD. The proposed development would be prominent with Tower 42 stepping down in the foreground and the Heron Tower to the left cascading down to the dome. The development would not harm the clear backdrop of the Cathedral which could remain distinctive and detached from the City cluster continuing to rise above the tree canopy in the local view.
393. View 22 from Somerset House Terrace is an historic view rediscovered by the re-opening of the River Terrace, which was a popular venue for promenading during the mid-19th century. The fact that it is now directly accessible from Waterloo Bridge is an added attraction. The elevated terrace is on a level with the canopies of the Embankment plain trees and these, together with Chamber's façade, lead the eye towards the dome of St Paul's, which is the

focal point. This draft guidance identifies the whole of the terrace of Somerset house as the viewing area and these have been tested in HTVIA C11 and C12 and Additional City of London Views March 2023.

394. The original clear sky setting of the Cathedral identified in the draft guidance has evolved. Although the dome remains visible and the focal point from places within the viewing area, Heron Tower appears behind the peristyle and lower part of the dome. The proposals for 55 Bishopsgate are set to the right of this and would bring a very tall building closer to the dome. The proposed development would appear in the background of the view within the western part of the City cluster. The upper third of the tower appears above the roofline of Tower 42. Its lower levels are wholly obscured by the surrounding building forms of the cluster. The new building is seen in conjunction with the existing buildings of the City Cluster and is legible as part of this tall building context. The height of the proposed development mitigates and forms a step up between St Pauls to the west and 22 Bishopsgate to the east, forming an evolving skyline composition. A significant skyline gap is retained between the proposal and St Paul's Cathedral, allowing it to remain as a prominent architectural feature within the view. On balance, it is considered this view is preserved.
395. The downstream views from Lambeth Bridge V25, Hungerford V43 (A) and Waterloo Bridges 42 (A) Horse Guards and Whitehall Court V34 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 However, officers concur with the views of WCC that there would be a diminishment in the primacy of the Cathedral in V42 (A) and V43 (A) due to the expansion of the City Cluster towards the north west pulling taller buildings closer to the Cathedral and slightly challenging its primacy of the Cathedral. In V34 officers also concur with WCC that the proposed development would erode the skyline and the picturesque qualities of this townscape view from St James's Park towards Horse Guards and Whitehall Court.
396. In summary, the proposal would preserve, and in relation to V21, V22 and V25, 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. In relation to V34, V42 (A) and V 43 (A) the development would be prominent and the composition of V34 would be eroded and the primacy of St Pauls Cathedral in V42(A) and V43 (A) would be challenged.

London Borough of Camden:

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

London Borough of Hackney:

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

London Borough of Tower Hamlets:

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

Conclusion on Neighbouring Borough Local Views:

400. The proposals would result in some diminishment in WCC local V34, V42 (A) and V 43 (A). Otherwise, the proposal would largely 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:

401. 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). These are addressed individually below:

St Pauls Cathedral:

402. The impact on St Pauls Cathedral and its setting is identified in the SPD Protected Views and assessed in detail in the LVMF above and also under Indirect Impacts to Listed Buildings.
403. St Pauls Cathedral has metropolitan presence in London riparian views from the Thames, its 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.
404. In 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.

405. In baseline and cumulative scenarios officers consider that while visible, the proposals will largely not diminish an appreciation of St Paul's Cathedral as a skyline landmark and there would be no encroachment on or erosion of the ability to appreciate its defining silhouette. There would however be some diminishment in its primacy on the skyline from Waterloo Bridge and to a lesser extent from Golden Jubilee/Hungerford Bridge. For the reasons set out elsewhere, it is considered the proposal would diminish views of the Cathedral from here.
406. The proposals would bring very tall buildings closer to the Cathedral when viewed from Waterloo Bridge, adding to the relative visual weight of the Cluster, eroding the integral strategic skyline gap between the Cluster and the Cathedral and impinging on its pre-eminence, as set out elsewhere in this report. This would result in a diminishment of the Cathedral as a Skyline Feature.

Cannon Street Station (Towers):

407. The proposals will be seen as part of the wider backdrop behind the Station Towers in views from Southwark Bridge, but distinctly forming part of the northwest grouping within the City Cluster with Tower 42 within the foreground. There would be no intervisibility with the towers and the development would not 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. As such it is considered views of the station towers would be preserved.

Former Port of London Authority HQ:

408. 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 from Tower Hill. 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 part of an evolving established cluster. Therefore, the former Port of London Authority HQ is considered to retain its prominence and visual strength. Thus, views of this City Landmark are considered preserved.

Royal Exchange:

409. The proposals would 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. Thus, views of this City Landmark are considered preserved.

St Botolph Bishopsgate

410. The proposals would be seen together with St Botolph Bishopsgate in views south along Bishopsgate. 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. Thus, views of this City Landmark are considered preserved.

The Guildhall:

The proposals would be visible above Guildhall Art Gallery from Guildhall Yard as part of the wider City Cluster. There would be no direct impact on the historic Guildhall. 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. Thus, views of this City Landmark are considered preserved.

St Mary Aldermanbury:

411. The proposals would be seen together in views east along Queen Victoria Street. 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 which is detached and contained from St Mary Aldermanbury. Thus, views of this Skyline Feature are considered preserved.

St Lawrence Jewry:

412. . The proposals will be visible within the backdrop in views east along Gresham Street. 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 distant and detached backdrop of tall buildings. Thus, views of this Skyline Feature are considered preserved.

St Augustine:

413. The proposals would be seen together in views east along St Pauls Churchyard. 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 distant and detached backdrop of tall buildings ancillary to a pre-eminent foreground. Thus, views of this Skyline Feature are considered preserved and impacts are further discussed in the Heritage section.

St Giles Cripplegate:

414. The proposals would be seen together in east from St Giles Terrace. 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 which is detached and

contained from St Giles Cripplegate. Thus, views of this Skyline Feature are considered preserved.

Tower Bridge

415. 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 be partially visible in the City cluster, appearing to the rear-right of the cluster in this view and there would be no intervisibility with Tower Bridge. In cumulative scenarios the development would be occluded by 1 Undershaft. Thus, views of this City Landmark are considered preserved and impacts are further discussed in the Heritage section.

Tower of London:

416. 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, but historically associated, 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. Within these views it has been found that the proposals have a limited visual impact and will not obscure, distract from or dominate the Tower of London due to the intervening distance, siting, scale, form and appearance of the proposals, which will assist in consolidating the Cluster form. Thus, views of this City Landmark are considered preserved and impacts are further discussed in the ToL section of the report.

Conclusion on City Landmarks and Skyline Features:

417. The proposal would largely preserve views of all relevant City Landmarks and Skyline Features with the exception of St Paul's Cathedral. This would result in some conflict with part of CS 13(2).

Conclusion on Strategic Views:

418. 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 Panoramic LVMF views 1A -2, 2A, 3A , 4A , 5A and 6A. It was also sited and designed to preserve strategic views of and from the Monument and largely of the setting and backdrop to St Paul's Cathedral, including from the Processional Route.

419. There would be some diminishment to the primacy of St Pauls Cathedral as the Strategically Important Landmark in LVMF River Prospects 15 B.1 and 15 B.2 and to a lesser extent LVMF 17 B.1 and 17B.2. The proposal would also harm the characteristics and composition of the Townscape View 26A.
420. The proposal would enhance the composition and characteristics of a number of neighbouring borough views which draw some benefit as a material consideration. Aside from WCC views V34, V42(A) and V43(A).
421. It would draw some more limited conflict with CS13(2) in that, whilst preserving views of most relevant City Landmarks and Skyline Features, it would harm views of St Paul's Cathedral from Waterloo Bridge and Hungerford Bridge.
422. Overall, the proposal satisfies CS13 (3), as it relates to the Tower of London World Heritage Site. The development draws conflict with Local Plan Policy CS13 (1 and 2) , Emerging City Plan Policy S13, London Plan Policy HC4 , GLA LVMF SPG and City of London Protected Views SPD.

Heritage

Designated Heritage Assets:

423. Objections have been received from the GLA, Government's advisor on the historic environment, Historic England, Surveyor to the Fabric of St Paul's Cathedral and the national amenity society, the Twentieth Society as well as other third parties. Officers have considered these representations carefully and have approached them on the basis that the views of statutory consultees on matters within the scope of their expertise should be given due deference. Where officers disagree with views expressed by statutory consultees, clear reasoning has been provided in this report.
424. Eversheds have objected to the HTVIA being insufficiently thorough. Officers consider that a rigorous assessment has been undertaken to understand the impact of the development in baseline and cumulative scenarios including the visual impacts at a local and strategic level using AVR and 3d modelling as well as assessing environmental, functional impacts The approach is proportional to the proposals and comparative to other tall building applications submitted to the City of London.

The HTVIA comprises:

- All heritage receptors up to 250m from the Site;
- All Grade I and II* listed buildings, conservation areas, Registered Parks and Gardens ('RPG') and Scheduled Monuments within 500m from the Site;
- Key heritage receptors, including Grade I and II* listed buildings, in key townscape views of the Proposed Development;
- Townscape character areas up to 500m from the Site; and

- Visual receptors in the local, medium and distant townscape.

Indirect Impacts

St Paul's Cathedral (Grade I):

Significance:

425. 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.

Setting:

426. 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.

- i) 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.
- ii) 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.

- iii) 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. These make a substantial contribution to significance and an appreciation of it.
- iv) 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:

- 427. The building has been strategically sited within the heart of the City Cluster, which has been a Plan-led approach to consolidating tall buildings and growth in a manner which would be the least impactful on strategic heritage assets, including St Paul's. Minimising impact on townscape and strategic views of the City has been generative of the design for 55 Bishopsgate. The height and gently arcing, pinnacle-like form of the proposal would largely preserve, but cause some harm to, the pre-eminent skyline setting of St Paul's Cathedral.
- 428. In terms of those strategic City-wide riparian views from the banks of the Thames and its bridges. Largely these are preserved with the Cathedral remaining as the pre-eminent landmark in the view and this represents an important element of significance both as a symbol of the Diocese of London and as an internationally famous symbol of London itself. Wren's great classical dome still dominates the townscape around and has been an enduring part of the London's character for centuries.
- 429. Historic England, GLA, Surveyor to St Pauls Cathedral and third party representations object to the impact on setting and significance from south western vantage positions and particularly from Waterloo Bridge. Officers also identify an impact on the character of the setting of Cathedral and also conclude there is a degree of harm from these vantage positions.
- 430. Experiences from Waterloo Bridge would be the most impacted and to a lesser extent there would be a negative affect on setting and significance from Golden Jubilee/Hungerford Bridge.

431. Due to its height, mass, and siting, the proposed development in baseline and cumulative scenarios would increase the prominence and visual weight of the Cluster of tall buildings, pulling the cluster closer to, and erode the strategic skyline gap between, it and the Cathedral. This would materially detract from the architectural, historic and communal significance of St Paul's, altering the balance of visual prominence between the Grade I listed building and the tall buildings cluster beyond.
432. From Blackfriars Bridge the setting of the Cathedral is less pristine and along the Southbank more oblique orientations provide a less balanced composition and in both cases impacts and the visual challenges are more tempered.
433. In terms of the processional approach along Fleet Street the overall height and form of the design has been altered in order to preserve the skyline setting of St Paul's. 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 the HTVIA views 11, 12, 13, 14, 14.1, 15, 30, CO7 and CO15. 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 panoramas and riparian views, assisting the consolidation of the City Cluster will in turn soften the backdrop impact on the Cathedral. At no point would the pristine, sky-etched silhouette of the Cathedral be obscured or shadowed by the proposal, which would be sited some distance from it on the whole. Thus, this significant contribution of setting to significance would be preserved.
434. In terms of those wider pan London views and approaches where the Dome offers a skyline presence in broad identity defining London panoramas in detail in the Strategic View and Local Views from other Boroughs. The development would not affect the primacy of the Cathedral's clear sky silhouette or impact on ability to appreciate the iconic presence. The development would assist in the consolidation of the City Cluster as a coherent skyline form assisting the composition and characteristics of the views overall and reinforcing the distinction between the modern City of London and the context of the Cathedral. Thus, this significant contribution of setting to significance would be preserved.
435. In terms of more immediate, often incidental experiences of the Cathedral the development would largely not be visible but where the development does appear for example St Paul's Churchyard due to the distance, typology of the building and context within the City Cluster there would be no adverse impact on the primacy of the Cathedral which at all times continues to dominate its immediate surrounding as the defining skyline presence. Thus, this moderate contribution of setting to significance would be preserved.

436. St Pauls Cathedral is an iconic building of international importance and its historic, architectural and evidential values are of the uppermost significance and therefore great weight must be attached to this significance in evaluating any impacts. Whilst the significance and setting of the Cathedral is largely preserved the development would be a distracting addition to its riparian settings from the south west. This impact is considered harmful, and the special architectural and historic interest and heritage significance of St Paul's Cathedral would not be preserved. Overall, the impact is considered significant, less than substantial in the parlance of the NPPF, towards the lower end of the spectrum. Considerable importance and great weight is afforded to this harm. This concurs with the position of Historic England.

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

Significance:

437. The Former Port of London Authority Building (Grade II*) was built 1912 – 22 by Sir Edwin Cooper. This monumental Portland stone landmark building is in the Beaux Arts classical style and features a richly embellished tower. Its significance lies in its architecture and historic Port of London civic function and to a lesser degree its setting. It is of a high level of architectural, historic and artistic significance.

Setting:

438. The setting of the listed building comprises open space to the foreground with Trinity Square Gardens and the Tower Hill War Memorial for Mercantile Marines. The adjacent buildings within its immediate setting are also constructed from Portland stone helping to form a small group of classical styled traditional buildings of a similar scale.
439. In the wider setting there is a broad range of buildings in terms of period, style, height and materiality. The building forms part of the setting of the Tower of London. The broad tower embellished with order of Corinthian pilasters, arched niche and colossal figure sculpture (Old Father Thames) is a clearly identifiable landmark feature in river prospect views. In longer north westerly views the building's back drop is dominated by the tall towers of the City Cluster.

Impact:

440. Views C21 and C31 of the HTVIA show the proposed development in views of 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.

441. 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.

Royal Exchange (Grade I):

Significance:

442. 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. It replaces three royal exchanges previously built on the site and is symbolic as symbolising the centre of commerce for the City of London.
443. It is of exceptional historic and architectural interest as “the greatest of the City’s 19th century exchanges” and remains as the only survivor. Its exceptional architectural composition, prominent site location and historical association all suggest a public role. It is historically symbolic as the centre of the commercial life of the City and the financial role of the surrounding development.

Setting:

444. 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 and contributes to an understanding of the former function in this financial district of the City. In AVR View 42 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 contrasting architectural languages of this view has come to symbolise the continued success and evolution of the City and contributes greatly to the listed building’s setting.

Impact:

445. The proposals will be seen in views east from Bank Junction taking in the Royal Exchange. AVR View 42, which is approximately 470m from the site, demonstrates the setting relationships of the existing buildings in the eastern cluster and the interaction between the historic townscape and the character

of the 21st century commercial centre. In the baseline scenario, the site will appear part of the City Cluster, with the building located to the north of 22 Bishopsgate. The upper levels of the proposed development will be seen as part of the established group of taller buildings with the lower to upper central portions of the building obscured by Tower 42. The intervisibility with the building in this way will not affect the value of the heritage asset and only serve to reinforce these positive juxtapositions between the significant assets and the commercial centre of the cluster. As such the proposals will appear consistent with the existing tall building backdrop setting and will reinforce this part of the townscape character.

446. Officers consider that while visible, the proposals will not diminish an appreciation of the listed building's silhouette or decorative detail. It is considered there would be no harm to the significance of this listed building or to its setting.

37-38 Threadneedle Street British Linen Bank (Grade II)

Significance:

447. The British Linen Bank (37-38 Threadneedle Street) was built in 1902 to the designs of J. Macvicar Anderson. It is constructed of Portland Stone, in a heavy Palladian style; rusticated and arched below, columns above, with pilastered end bays. It was the headquarters of the British Linen Bank which was later acquired by the Bank of Scotland in 1969.
448. The building derives its historic and architectural interest as a purpose built bank headquarters of the early 20th century, in the Palladian style. It also forms part of the early 20th century period of commercial development within this part of the City, in which a number of banks and financial institutions took up residence.

Setting:

449. The heritage asset is seen within the context of the tall buildings of the Eastern City Cluster, which articulate the extent of transformative change that this area of the city has undergone. There is some surrounding commercial development from the Victorian/Edwardian eras, including Westminster Bank directly to the east and Lloyds Bank opposite at 39 Threadneedle Street, which helps to contribute to an understanding of the historic functional setting and bridge the gap between the City's medieval and contemporary character.

Impact:

450. The GLA considers that within View 50 the proposed development would cause harm to the setting of 37-38 Bishopsgate. This appears to be an error

as there are no listed buildings at this address. It would appear that the building being referred to is nos. 37-38 Threadneedle Street which is the former British Linen Bank in this assessment. This building is not seen within View 50 as it is blocked from view by the buildings within St. Helens Place and the listed buildings at 52-68 Bishopsgate.

451. GLA concerns are raised under paragraph 70, of their Stage 1 Report, which states that: *The impact of the proposed development is similar in each case in terms of its effects. The proposed building appears in the view at an overwhelming scale in relation to the heritage assets; views along streets are visually stopped, often with the last remaining view of sky along the street blocked and heritage assets are backdropped by the proposed development. These effects are considered to cause harm at the low to medium end of the less than substantial scale to both the setting of listed buildings and the conservation areas.* This is addressed below.
452. The proposed development would be seen prominently in views towards the heritage asset from the northeast on the approach along Threadneedle Street and also from views looking north along Bishopsgate. The building will be seen as a prominent new element forming part of the eastern cluster. The proposed development will be appreciated as an addition to the existing and emerging tall building context along Bishopsgate and will not introduce a new form of development within the Bank's immediate setting.
453. Officers consider that while visible, the proposals will not detract from or change the experience of the listed building or an appreciation of its heritage value. Where the development is visible, it is largely peripheral to the experience of the heritage asset and reinforces the existing urban context. The development will not harm the setting or significance of the listed building.

46 Bishopsgate (Grade II)

Significance:

454. 46 Bishopsgate comprises a mid-18th century house that was refronted in the 19th century, with a modern shopfront at ground floor. It is of four-storeys with a recessed garret that is constructed of yellow London Stock Brick and a slate roof. It is designed in the Neo-Classical architectural style, articulated by the symmetrically placed sash windows, stucco detailing, restrained façade and flat roof.
455. The heritage asset derives historic interest as a well-preserved example of a mid-18th century house, which was later refronted in the 19th century. It also illustrates the early 20th century phenomenon of retail conversion of the ground floors of residential buildings. The building also has architectural

interest in that it retains a well-preserved example of 19th century Neo-Classical design along with the survival of its 18th century original interiors.

Setting:

456. The immediate setting of the listed building is much changed with modern office buildings opposite and further along Bishopsgate Road. These contrast significantly with the small scale, ornate character of 46 Bishopsgate.
457. Further along Bishopsgate the areas origins are more apparent, but these are intersected by the presence of modern, infill development that is prevalent throughout the City.

Impact:

458. The GLA considers in View 50 the development would cause harm to the setting of 46 Bishopsgate. This view appears to have been referenced in error as no. 46 would not be seen within View 50 as the building is obscured from view by the buildings within St. Helens Place and the listed buildings at 52-68 Bishopsgate.
459. GLA concerns are raised under paragraph 70 of their stage 1 Report, which states that: *The impact of the proposed development is similar in each case in terms of its effects. The proposed building appears in the view at an overwhelming scale in relation to the heritage assets; views along streets are visually stopped, often with the last remaining view of sky along the street blocked and heritage assets are backdropped by the proposed development. These effects are considered to cause harm at the low to medium end of the less than substantial scale to both the setting of listed buildings and the conservation areas.* This is addressed below.
460. The building which currently occupies 55 Bishopsgate has been carefully designed to respect Hudson Bay House (52-68 Bishopsgate) opposite being reflective of the scale, proportion and construction materials and sits relatively quietly within its context.
461. The proposed development will be a new, prominent feature immediately to the west of no. 46 which has its principal elevation to Bishopsgate.
462. The scale of the proposed building and its low-level treatment will result in change to the character of the urban realm immediately opposite the site. The new entrance, framed by the bronze frame will be prominent in views with the listed building, introducing a new setting but this will not detract from the overall elements of significance.

463. The overall impact is therefore considered to be neutral. It is considered there would be no harm to the significance of the listed building by way of impact on its setting.

48 Bishopsgate (Grade II)

Significance:

464. 48 Bishopsgate dates to the late 19th century and is a four-storey building, constructed of Portland Stone with richly designed architraves and pedimented windows and doorways. The windows also feature Juliet balconies, constructed of intricate, carefully crafted cast ironwork. The ground floor has a large round headed principal doorway entrance with intricate stonework detailing. The ground floor also features a large square headed opening, with a plate glass window.
465. The building derives historic interest as a well-preserved example of a late 19th century building in the Second Empire Style. The building derives further architectural interest for the flamboyancy of its design with ornate stonework that illustrates the quality of craftsmanship at the time.

Setting:

466. The immediate setting of the listed building is much changed with modern office buildings opposite and further along Bishopsgate Road. These contrast significantly with the small scale, ornate character of 48 Bishopsgate.
467. Further along Bishopsgate the areas origins are more apparent, but these are intersected by the presence of modern, infill development that is prevalent throughout the City.

Impact:

468. The GLA considers that in View 50 the development would cause harm to the setting of 48 Bishopsgate. This view appears to have been referenced in error as no. 48 would not be seen within View 50 as the buildings are obscured from view by the buildings within St. Helens Place and the listed buildings at 52-68 Bishopsgate.
469. GLA concerns are raised under paragraph 70 of their Stage 1 Report, which states that: *The impact of the proposed development is similar in each case in terms of its effects. The proposed building appears in the view at an overwhelming scale in relation to the heritage assets; views along streets are visually stopped, often with the last remaining view of sky along the street*

blocked and heritage assets are backdropped by the proposed development. These effects are considered to cause harm at the low to medium end of the less than substantial scale to both the setting of listed buildings and the conservation areas. This is addressed below.

470. The building which currently occupies 55 Bishopsgate has been carefully designed to respect Hudson Bay House (52-68 Bishopsgate) opposite being reflective of the scale, proportion and construction materials and sits relatively quietly within its context.
471. The proposed development will be a new, prominent feature immediately to the west of no. 48 which has its principal elevation to Bishopsgate.
472. The scale of the proposed building and its low-level treatment will result in change to the character of the urban realm immediately opposite the site. The new entrance, framed by the bronze frame will be prominent in views with the listed buildings, introducing a new setting but this will not detract from the overall elements of significance.
473. The overall impact is therefore considered to be neutral. It is considered there would be no harm to the significance of the listed building by way of impact on setting.

Hasilwood House 52-68 Bishopsgate (Grade II)

Significance:

474. 52-68 Bishopsgate was built in 1928 to the designs of Mewes and Davis. It comprises a five-storey building which 14 bays wide. It is constructed of Portland Stone in a North American Beaux Arts architectural style.
475. The building possesses a high architectural and artistic interest owing to the survival of its grand, extensive principal façade, cupola and entranceway which is a high-quality example of Beaux Art commercial architecture. This is articulated by symmetrically placed sash windows, the use of Doric columns, restrained façade, and detailing. The entrance to St Helen's Place penetrates the building in its central four bays and features the arms of Leathersellers Company on an entablature carried on fluted Doric columns and striking and prominent cupola which is equally experienced from within St Helen's Place and from Bishopsgate.
476. It articulated the period of commercial development in this area of the City, which was defined by the design and use of buildings for banking and associated commercial activities. The building also has architectural interest owing to the survival of its grand, extensive principal façade, cupola and entranceway which is a high-quality example of Beaux Art commercial architecture.

Setting:

477. The immediate setting of the buildings is much changed with modern office buildings opposite and further along the Bishopsgate Road. Many of these have been constructed in a contemporary Portland stone, referencing the historic materiality of the area. This includes 55 Bishopsgate opposite which has been carefully designed to respect 52-68 Bishopsgate being reflective of the scale, proportion and construction materials. In the wider vicinity, the contrast in contemporary development becomes greater with the presence of a number of tall buildings which form part of the Eastern Cluster. 56-68 Bishopsgate is already experienced in the context of the tall towers of 22 and 100 Bishopsgate, which appear against the backdrop of the building's principal elevation.
478. The gateway and its architectural interest is particularly appreciated within the tranquil setting of St Helen's Place a unique enclave and commercial context where there is a unblemished backdrop to the roofscape and cupola with Tower 42 on the periphery. This clear sky setting enables an appreciation of architectural and artistic values.
479. The historic setting of the listed building has been largely eroded, apart from the neighbouring Guild Church of St Ethelburga which survives as a small remnant of the late 14th century and the two neighbouring buildings to the southwest which survive as a remnant of the former 18th and 19th century development within the area.
480. Further south along Bishopsgate the areas origins are more apparent, but these are intersected by the presence of modern, infill development that is prevalent throughout the City.

Impact:

481. The GLA and other objectors identify harm to the designated heritage asset respect to AVR View 50 where the GLA state: *The impact is dramatic with full backdropping of the cupola and tower of 52-68 Bishopsgate, detracting from its silhouette against the sky, which is a key aspect of the significance of these buildings. This is considered to cause harm at the low to medium end of the less than substantial scale.* The harm identified is at the low to medium end of the less than substantial scale.
482. The Proposed Development would be a prominent feature immediately to the west of this listed building which has its principal elevation to Bishopsgate.
483. Viewpoint 50 is located from within St Helen's Place, a privately gated street, accessed from the adjoining Bishopsgate. St Helens is located within St

Helen's Place Conservation Area which forms the immediate setting of the Grade I listed Church of St Helen Bishopsgate.

484. The view has a clear foreground, midground and background. The foreground of the view comprises the cobbled paving stones of St Helen's Place, which form an attractive public realm with associated street lighting and shrubbery. The central focus of the view is the main street of St Helen's Place, which travels on a linear axis from the foreground to midground of the view, terminated by 52-68 Bishopsgate. The eye is drawn along the trajectory of the paved street, which forms a central viewing corridor, reinforced by the development either side of it of a neo classical design.
485. The central viewing corridor is terminated by the Grade II listed 52-68 Bishopsgate, comprising a covered access, supported by Doric Columns which create an opening to Bishopsgate and has through views to the current building on Site. The building also features an octagonal arcaded belfry and cupola with a weathervane. This prominent feature currently stands out against the skyline, emphasising the extent of high-quality architecture within the view.
486. The background of the view is currently dominated by Tower 42 which extends up behind nos. 3 and 5-7 St. Helen's Place to the left of the belfry. The tower is constructed of modern materials and its linear form contrasts strongly with the historic character of the traditional buildings in the foreground.
487. The proposed Development would appear directly behind and above the Grade II listed 52-68 Bishopsgate. It introduces a considerable new building form within the view and infills the remaining skyline gap adjacent to Tower 42. The proposed development would dwarf 52-68 Bishopsgate and would be seen against its backdrop resulting in the roof form including the cupola and belfry becoming less clearly defined against the skyline and would distract from these features.
488. Notwithstanding this the simplicity of the proposed building's façade allows the cupola to still be legible against this background and would not be completely lost from the view. The proposal is seen as adding to the existing contrast established by the presence of modern skyscrapers and low scale historic development within the view that is borne out of the evolution of this part of the City.
489. Due to the imposing presence and total loss of the current clear sky backdrop the development would reduce the primacy, ability to appreciate and clarity of the roof form of the listed building as experienced from St Helens Place. These features and contribution to overall composition are central to the

architectural values of the designated heritage asset. The proposed development will cause a low level of less than substantial harm to the significance of the listed building, by reasons of an impact on setting.

Leadenhall Market (grade II*)

Significance:

490. Leadenhall Market (Grade II*) is a covered market, dating to the 14th century and originally catered for meat, game and poultry. The current market buildings have external walls that are constructed of red brick and Portland Stone. The interior comprises giant painted Corinthian columns in cast iron with an ornate roof structure and cobbled floors that was designed in 1881 by Sir Horace Jones who was also the architect for Billingsgate and Smithfield Markets.
491. The heritage asset derives its historic interest as one of the oldest covered market sites in London, dating to the 14th century and is a remnant of the early phase of commercial development within this part of the city. It has further historic interest owing to its association with Sir Horace Jones, who was architect and surveyor to the City of London. He was also responsible for the design of Billingsgate and Smithfield Markets. The market derives architectural interest owing to its decorative roof structure, interior detailing and exterior facades, which together establish an ornate and impressive principal entrance way on Gracechurch Street.

Setting:

492. The immediate setting of Leadenhall Market comprises a rich mix of architectural styles and eras, which reflect the various stages of development within this part of the City. The tall buildings of the Eastern City Cluster are visible in views looking north along Gracechurch Street (View 48). They introduce a considerable new height element within the immediate setting of the market.

Impact:

493. The GLA has raised concerns with the impact of the new development on the setting of Leadenhall Market and other heritage assets. The concerns are raised under paragraph 70 of their Stage 1 Report which states that: *The impact of the proposed development is similar in each case in terms of its effects. The proposed building appears in the view at an overwhelming scale in relation to the heritage assets; views along streets are visually stopped, often with the last remaining view of sky along the street blocked and heritage*

assets are backdropped by the proposed development. These effects are considered to cause harm at the low to medium end of the less than substantial scale to both the setting of listed buildings and the conservation areas. This is addressed below.

494. The proposed development would be a visible addition within the setting of the listed building but would not change an appreciation of the value of the heritage asset which lies in its architectural detail and composition. The location and orientation of the proposed development means it would not distract from views into the market from Leadenhall St. or from within the market itself, which is very much a self-contained experience, where there would be no sense of the taller building as part of the Eastern cluster.
495. Officers consider that while the proposed development would be visible within the listed buildings setting, the proposals will not detract from or change the experience of the listed building or the appreciation of its heritage value. Where the Development is visible, it is largely peripheral to the experience of the heritage asset and no harm would be caused to its setting or significance.

National Bank Lothbury (Grade II*)

Significance:

496. The National Westminster Bank Including the Lothbury Gallery (grade II*) comprises the former headquarters of the Westminster Bank, constructed in 1923-31 by Mewes and Davis, in three phases. It is formed of a steel frame, with an exterior stone façade, of five storeys and two attics. It is designed in the Neo-Classical architectural style, articulated by its restrained façade and symmetrically placed sash windows.
497. The building's historic and architectural interest is derived from its existence as a well-preserved example of a purpose built bank, of the early 20th century and in the Neo-Classical architectural style. Further architectural interest is derived from its opulent and little altered interiors. The building also has historic interest owing to its reflection of early 20th century commercial development within this area of the city, in which the majority of buildings constructed in this period were defined by their use as banks and associated financial institutions.

Setting:

498. The immediate setting of the listed building comprises the narrow, historic street of Lothbury which continues into the narrower Throgmorton Street to the east. The historic character of the street is reflected by the building's surrounding development which is of a similar architectural style and era to

that of the listed building. The building's construction within this location positively contributes to an understanding of its historic location in this commercial hub of the City.

499. In views looking east along Throgmorton Street, glimpses of the tall buildings of the Eastern Cluster are seen within the immediate setting of the listed building. The contemporary form of the buildings establish a considerable new height element within the immediate area, their modern glazed architectural form creating a backdrop to the classical detailing of the buildings within Lothbury and Throgmorton Street.

Impact:

500. The GLA has raised concerns with the impact of the new development on the setting of the National Westminster Bank, Lothbury and other heritage assets. The concerns are raised under paragraph 70 of their Stage 1 Report, which states that: *The impact of the proposed development is similar in each case in terms of its effects. The proposed building appears in the view at an overwhelming scale in relation to the heritage assets; views along streets are visually stopped, often with the last remaining view of sky along the street blocked and heritage assets are backdropped by the proposed development. These effects are considered to cause harm at the low to medium end of the less than substantial scale to both the setting of listed buildings and the conservation areas.* This is addressed below.
501. AVR View 43 shows the setting relationships of the existing buildings of the eastern cluster and the historic townscape of the CA and the character of the 21st century commercial centre. The proposed development is seen in this view as part of the established group of taller buildings within the background reinforcing this part of the townscape character. The proposals infill a previous skyline gap within the listed buildings existing setting forming part of the already established tall building context in the wider setting of the listed building. The listed building can be seen in the left-hand portion of View 43 with the new building in the distance approximately 350m from the heritage asset.
502. Officers consider that while the proposed development would be highly visible within the listed buildings setting, the proposals would not detract from or change the experience of the listed building or the appreciation of its heritage value. Where the development is visible, it is largely peripheral to the experience of the heritage asset as it forms part of the Eastern Cluster backdrop and as such no adverse impacts on setting or significance would result from the proposed development.

Significance:

503. Built in 1919 by W Campbell-Jones as a bank, 7-9 Gracechurch Street is a steel framed building clad in Portland stone. The building derives its historic and architectural interest as a purpose-built bank and office block of the early 20th century, in the French/ Beaux Arts style. The building also retains historic interiors including a sumptuous banking hall filling the entire ground floor with marble, tile and mosaic work by Art Pavements. The bank forms part of the early 20th century period of commercial development within this part of the City, in which a number of banks and financial institutions took up residence.

Setting:

504. The heritage asset is located on the west side of Gracechurch Street approximately 300m south of the proposed development 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.
505. The tall buildings of the Eastern Cluster are visible in views looking north along Gracechurch Street (View 48). They introduce a considerable new height within the immediate setting of 7-9 Gracechurch Street.

Impact:

506. The GLA has raised concerns with the impact of the new development on the setting of 7-9 Gracechurch Street and other heritage assets. The concerns are raised under paragraph 70 of their Stage 1 Report, which states that: *The impact of the proposed development is similar in each case in terms of its effects. The proposed building appears in the view at an overwhelming scale in relation to the heritage assets; views along streets are visually stopped, often with the last remaining view of sky along the street blocked and heritage assets are backdropped by the proposed development. These effects are considered to cause harm at the low to medium end of the less than substantial scale to both the setting of listed buildings and the conservation areas.* This is addressed below.
507. The proposed new tower, in the View 48, would be seen looking north terminating the view along this section of Gracechurch Street directly behind Nos. 7-9 Gracechurch Street but would be seen at a distance forming part of its backdrop with other tall buildings.
508. 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 of the listed building looking north, this is not inconsistent with the existing character of the surroundings, which already takes in a number of structures seen over the roofline.

509. Officers consider that while the proposed development would be visible within the listed buildings setting, it would not detract from or change the experience of the listed building. Where the development is visible, it is largely peripheral to the experience of the heritage asset forming part of the Eastern Cluster backdrop and as such no adverse impacts on setting or significance would result from the proposed development.

12- 14 Austin Friars (Grade II)

Significance:

510. 12-14 Austin Friars are three separately listed buildings that sit adjacent to each other within the street forming a small group and as such will be assessed together.
511. 12 Austin Friars was constructed in 1883 by E Gurning, it is four-storeys and includes a garret and basement. It is constructed of red brick with stucco surrounds to the doorway and windows. It is designed in the Neo-Classical architectural style, which is articulated by the symmetrically placed sash windows, restrained façade, decorative neo-classical motifs in the brickwork and the pedimented doorway entrance. It is now in use as the Furniture Makers Hall.
512. The listed building has historic interest as a surviving remnant of the late 19th century phase of development of this part of the City, an area defined by the design and use of buildings for banking and associated commercial activities. It derives principal architectural interest from its main exterior façade which comprises features of interest including a mosaic tiled entranceway, decorative red brickwork and symmetrical sash windows.
513. 13 Austin Friars was also built in the late 19th century and is constructed of Portland Stone. It comprises four-storeys including a basement and a garret. It is Neo-Classical in style, articulated by the symmetrically placed sash windows, restrained façade and Neo-Classical motifs which feature on the building's principal façade. The building derives historic and architectural interest as a well-preserved example of late 19th century building in the Neo-Classical style.
514. 14 Austin Friars was built in 1882 and comprises five-storeys plus basement. It is constructed of red brick, however the ground floor features a stone render. It is also Neo-Classical in style, articulated by the restrained façade, symmetrically placed sash windows and flat roof. The building derives historic

and architectural interest as a well-preserved late 19th century building of the Neoclassical architectural style.

Setting:

515. The immediate setting of the listed buildings is the enclosed, narrow, historic street of Austin Friars which comprises architecture of a similar style and era. The buildings are bound by their consistent height, architectural uniformity and function, contributing to an understanding of their location within the commercial centre of the City.
516. Within the listed buildings wider setting, as depicted in AVR View 44, the presence of the tall buildings of the Eastern Cluster can be felt which introduce a considerable new height element. Their material palette of modern glazed panels contrast significantly with the decorative brickwork and intricate Neo classical features of the listed buildings. The listed buildings setting makes a positive contribution to an understanding of their heritage value by virtue of the presence of high quality architecture from a similar style and era.
517. Due to the enclosed nature of the listed buildings setting and extent of intervening development, the development site is not currently visible within their setting.

Impact

518. The GLA has raised concerns with the impact of the new development on the setting of 12-14 Austin Friars and other heritage assets. The concerns are raised under paragraph 70 of their Stage 1 Report, which states that: *The impact of the proposed development is similar in each case in terms of its effects. The proposed building appears in the view at an overwhelming scale in relation to the heritage assets; views along streets are visually stopped, often with the last remaining view of sky along the street blocked and heritage assets are backdropped by the proposed development. These effects are considered to cause harm at the low to medium end of the less than substantial scale to both the setting of listed buildings and the conservation areas.* This is addressed below.
519. As previously stated 12, 13, and 14 have been considered together as their location and orientation in relation to the application site are similar. The listed buildings are best appreciated looking northwards from within Austin Friars directly on to their principal façades. The proposed tower would be a prominent addition in the surrounding townscape, terminating the view eastwards along Austin Friars in which the heritage assets would be seen obliquely. The tower would therefore be seen in more peripheral views of the listed buildings rather than within the most significant views of the buildings that look northwards.

520. AVR View 44 shows the setting relationship and prominence of the proposed building in views looking east of the listed buildings. The type and scale of the proposed development is characteristic of the surrounding townscape and will be appreciated as an addition to the existing and emerging tall building context along Bishopsgate which is prominent in the wider setting of the listed buildings.
521. Officers consider that the development would be appreciated as forming part of the Eastern Cluster, with other large towers and would not be harmful to the significance or setting of the listed buildings.

23 Austin Friars (Grade II)

Significance:

522. 23 Austin Friars was constructed in 1888 by Sir Aston Webb and Ingress Bell. It comprises three-storeys plus a basement and dormers. It features a Portland stone frontage, in a derivation of the late gothic architectural style. The building derives architectural and historic interest as a well-preserved example of a late 19th century building in the late gothic architectural style. It also has historic interest owing to its association with a prominent 19th century architect, Aston Webb, who was also responsible for the design of the principal façade of Buckingham Palace.

Setting:

523. The immediate setting of 23 Austin Friars comprises an attractive courtyard featuring formal planting and mature trees. Beyond this the setting comprises the enclosed, narrow, historic street of Austin Friars which includes architecture of a similar style and era. The buildings are bound by their consistent height, architectural uniformity and function, contributing to an understanding of their location within the commercial centre of the City. Within the listed buildings wider setting, as depicted in AVR View 44, the presence of the tall buildings of the eastern cluster can be felt which introduce a considerable new height element. Their material palette of modern glazed panels contrasts significantly with the decorative stonework and intricate gothic features of the building.
524. It is considered that the listed buildings setting makes a positive contribution to an understanding of its heritage value by virtue of the presence of high quality architecture from a similar style and era.

525. Due to the enclosed nature of the listed buildings setting and extent of intervening development, the current development site is not visible within the heritage assets setting.

Impact:

526. The GLA has raised concerns with the impact of the new development on the setting of 23 Austin Friars and other heritage assets. The concerns are raised under paragraph 70 of their Stage 1 Report, which states that: *The impact of the proposed development is similar in each case in terms of its effects. The proposed building appears in the view at an overwhelming scale in relation to the heritage assets; views along streets are visually stopped, often with the last remaining view of sky along the street blocked and heritage assets are backdropped by the proposed development. These effects are considered to cause harm at the low to medium end of the less than substantial scale to both the setting of listed buildings and the conservation areas.* This is addressed below.
527. The listed building is appreciated best looking southwards from within Austin Friars directly onto the principal ornate façade. The proposed development, would be a prominent addition in the surrounding townscape, terminating the view eastwards along Austin Friars in which the heritage asset would be seen obliquely. The tower would therefore be seen in more peripheral views of the listed building rather than within the most significant views looking directly onto the heritage assets formal facades.
528. AVR View 44 shows the setting relationship and prominence of the proposed building in views looking east of the listed building. The type and scale of the proposed development is characteristic of the surrounding townscape and will be appreciated as an addition to the existing and emerging tall building context along Bishopsgate which is prominent in the wider setting of the listed building.
529. Officers consider that the development would be appreciated as forming part of the Eastern Cluster, with other large towers and would not be harmful to the significance or setting of the listed buildings.

13 Bishopsgate (Grade I)

Significance:

530. The Westminster Bank, 13 Bishopsgate, was built in 1865 by J Gibson. The building was constructed as the new head of office by the direction of the

National Provincial Bank of England. The Bank is constructed in Portland stone in a Neo-Classical style with arched windows and Corinthian columns.

531. The building derives historic interest as a mid-19th century purpose-built headquarters of a national bank. Commercial development of this period in this area of the City was defined by the design and use of buildings for banking and associated commercial activities. It also derives historic interest for its association with a prominent 19th century architect, John Gibson, who worked with Sir Charles Barry on the Houses of Parliament. The bank also draws architectural interest from its principal elevations that present a rich Neo-Classical façade with figures in high relief to the Bishopsgate Road.

Setting:

532. The immediate setting of Westminster Bank is the junction of Threadneedle Street and Bishopsgate. Bishopsgate is an ancient routeway and the surviving historic street pattern contributes to the historic heritage value of the Bank. The development which surrounds the heritage asset is mixed with Victorian, Edwardian and inter-war buildings as well as modern tall buildings that show the historic evolution of this area of the City.
533. Directly opposite the listed building and within its rear backdrop can be seen a number of tall buildings of the Eastern Cluster (see View 49). This includes 22 Bishopsgate directly opposite, which stands at 62 storeys (294.5m AOD in height) and Tower 42 and 99 Bishopsgate. Overall it is considered that the setting makes a neutral contribution to the understanding of the receptor's heritage value.
534. In views looking north along Bishopsgate, the exterior of the current building on site is partially visible with the listed building being largely seen within the silhouette of the adjacent building at 15 Bishopsgate. In the current context the existing building stands as an undistinguished element within the setting of the Grade I listed bank and has a neutral contribution to its setting.

Impact

535. The GLA has raised concerns with the impact of the new development on the setting of 13 Bishopsgate (Westminster Bank) and other heritage assets. The concerns are raised under paragraph 70 of their Stage 1 Report, which states that: *The impact of the proposed development is similar in each case in terms of its effects. The proposed building appears in the view at an overwhelming scale in relation to the heritage assets; views along streets are visually stopped, often with the last remaining view of sky along the street blocked and heritage assets are backdropped by the proposed development. These effects are considered to cause harm at the low to medium end of the less than*

substantial scale to both the setting of listed buildings and the conservation areas. This is addressed below.

536. The proposed development will be a new, prominent development immediately to the north of the listed building which has its principal elevation to Bishopsgate. The contemporary nature of the building's form and the highly glazed elevational treatment contrast strongly with the Portland stone facade of the historic building that its elevation would continue to stand out prominently within the street scape. The proposed development will add to the existing contrast established by the modern skyscrapers and the historic environment which is at a smaller scale. The scheme will be highly visible and a prominent addition within the setting of the listed building, adding to the backdrop of the listed building with other tall buildings within the Eastern Cluster.
537. The listed building derives its principal significance from its exterior façade which fronts Bishopsgate on a prominent corner location with Threadneedle Street. It is a building that is best appreciated in close views where the ornate detailing can be seen. The series of Neo-Classical figures on the roof of the building would not be affected by the proposed development and they could still be appreciated in their current skyline condition.
538. AVR 49 View shows the setting relationship and the prominence of the proposed building in views looking north along Bishopsgate within the backdrop of the listed building. Officers consider that the development would be seen in the backdrop to the listed building forming part of the Eastern Cluster along with other large towers. The development would not harm the significance, appreciation or setting of the heritage asset.

3-5 Bishopsgate (Royal Bank of Scotland) 7-9 Bishopsgate and 39 Threadneedle Street (Lloyds Bank) (Grade II)

Significance:

539. 3-5 Bishopsgate (Royal Bank of Scotland) 7-9 Bishopsgate and 39 Threadneedle Street (Lloyds Bank) are three separately listed buildings that sit adjacent to each other forming a small group that share the same setting and as such will be assessed together.
540. The Royal Bank of Scotland dates to the mid to late 19th century and is constructed of Portland Stone and has a long, Neo Classical frontage the ground floor of which is rusticated with mask keystones to the segmentally arched windows.

541. The building derives historic interest as articulating the latter part of the 19th century period of commercial development within this part of the City, in which a number of banks and financial institutions took up residence. It has further historic interest owing to its association with the Royal Bank of Scotland. The building also derives architectural interest from its principal elevation which is typical of the Neo-Classical architectural style.
542. 7 and 9 Bishopsgate is a 5-storey building that was constructed in the late 19th Century out of stone and pink marble. The building derives historic interest as a remnant of this commercial phase of development along Bishopsgate in the late 19th century a period in which this part of the City experienced the construction of purpose-built banks and commercial buildings. It also derives architectural interest as a well-preserved example of a late 19th Century building, constructed in the Classical style.
543. Lloyds Bank was built to the designs of T. Knolles Green in 1874-1876, originally for the Hampshire Banking Co., later Capital and Counties Bank and subsequently Lloyds Bank. Constructed in stone, it comprises a rusticated ground floor, with cabled pilasters over, turning to full columns at the corner and is distinctively Neo-Classical in architectural style.
544. The building derives historic interest as a mid-19th century purpose-built headquarters of a national bank. It further articulates this period of commercial development in this area of the City, which was defined by the design and use of buildings for banking and associated commercial activities. It derives architectural interest from its principal exterior elevation that affronts the Bishopsgate Road, a rich Neo-Classical façade with figures in high relief.

Setting:

545. The listed buildings form part of a coherent group of classically styled buildings on the western side of Bishopsgate that are finished in Portland Stone and are of a similar scale and height that is also reflective of buildings within Threadneedle Street. The immediate setting of these buildings is much changed comprising modern office buildings opposite and further along the Bishopsgate Road. Many of these have been constructed in a contemporary Portland stone, referencing the historic materiality of the area. In the wider vicinity, the contrast in contemporary development becomes greater with the presence of a number of tall buildings which form the Eastern Cluster.
546. The setting of the listed buildings comprises high quality architecture from a range of eras, which helps to articulate the area's historic evolution. It is considered that the listed buildings setting makes a positive contribution to its heritage value. The proposed development site is partially visible in views

looking north along Bishopsgate. In its current form it sits quietly within the backdrop of the listed building with its Portland stone façade and similar scale.

Impact:

547. The GLA has raised concerns with the impact of the new development on the setting of 3-5 Bishopsgate (Royal Bank of Scotland), 7-9 Bishopsgate and 39 Threadneedle Street (Lloyds Bank) listed Grade II. The concerns are raised under paragraph 70 of their Stage 1 Report, which states that: *The impact of the proposed development is similar in each case in terms of its effects. The proposed building appears in the view at an overwhelming scale in relation to the heritage assets; views along streets are visually stopped, often with the last remaining view of sky along the street blocked and heritage assets are backdropped by the proposed development. These effects are considered to cause harm at the low to medium end of the less than substantial scale to both the setting of listed buildings and the conservation areas.* This is addressed below.
548. As previously stated 3-5 Bishopsgate (Royal Bank of Scotland) 7-9 Bishopsgate and 39 Threadneedle Street (Lloyds Bank) have been considered together as their location and orientation in relation to the application site are similar. The listed buildings are best appreciated looking west wards from Bishopsgate / Threadneedle Street looking directly on to their principal façades.
549. AVR 49 shows that the proposed development will be seen in oblique views of the heritage asset to the north as part of the established townscape of the Eastern Cluster. Officers consider that the visibility of the proposed development in this way will not affect the value of the listed buildings which are seen within a wider terrace of similarly design buildings on the western side of Bishopsgate.
550. The proposed development will be appreciated as an addition to the existing and emerging tall building context along Bishopsgate and will not introduce a new form of development within the listed buildings immediate setting. The Proposed Development therefore does not detract from or change the experience of the listed buildings. Where the development is visible, it is largely peripheral to the experience of the listed building forming part of the Eastern Cluster backdrop.
551. The building's significance and setting will not be harmed by the proposals.

The Guildhall listed Grade I, Guildhall Library and Museum (Grade II*)

Significance:

552. The Guildhall and Guildhall Library and Museum are considered together as they form part of the Guildhall Complex which comprises a collection of designate and non-designated buildings. The Complex has been used as the City of London's Town Hall since the 15th century and is still the ceremonial and administrative centre of the City of London and its Corporation.
553. The Guildhall was originally the site of London's Roman amphitheatre the remains of which were uncovered in 1988 and have been preserved beneath the Guildhall Art Gallery.
554. The current Guildhall building dates from 1411 and stands above a crypt, the western part of which dates to the late 13th century. It was built on the instruction of the Lord Mayor of London, Thomas Knoles and was completed in 1440. At the time of its completion the Great Hall was the third largest hall in the country and second only to Westminster Hall in the capital.
555. The Guildhall is of high significance for its, archaeological, architectural, aesthetic and historical interest. The building contributes to the settings of a number of other listed buildings in the Guildhall Conservation Area.
556. The Former Guildhall Library and Museum was built in 1870-72 to designs by Sir Horace Jones, Architect and Surveyor to the Corporation of London from 1864 until his death in 1887. The building is in the Perpendicular Gothic Revival style in rough-faced Kentish Ragstone with Bath stone dressings and lead and slate roofs.
557. The Former Guildhall Library and Museum is of high significance for its, architectural, aesthetic and historical interest. The building contributes to the settings of a number of other listed buildings in the Guildhall Conservation Area.

Setting:

558. The Guildhall buildings sit around a courtyard which provides a brief sense of openness in contrast to the intensity of urban development which surrounds.
559. The buildings around the courtyard have a fairly consistent building line and height and give the sense that the courtyard is an area of formally planned public realm. View C18 is located approximately 660m west of the development site from within the western most part of the courtyard. Within this view the eye is drawn to the southern internal façade of the Guildhall which is constructed of squared rubble with ashlar dressing. The hall has an

open timber roof with transverse stone arches which are particularly perceptible from this viewpoint.

560. To the left-hand side of the view a glimpse of the Grade II* listed Former Guildhall and Museum set back behind the George Dance South Porch and to the right-hand side the Guild Hall Yard Irish Entrance (grade II) and The Mayor's And The City of London Court (grade II). Together, the buildings encircle the central courtyard along with the Guildhall West Wing (grade II) to the west and the Church of St. Lawrence Jewry (grade I) and the façade of the Guildhall Art Gallery to the east that read as one architectural ensemble of the Guildhall.
561. Beyond the buildings surrounding the courtyard, various phases of development appear, which are modern in character but of a similar scale, form and facing material to the historic buildings of the Guildhall. These buildings sit quietly within the background and allow the Guildhall buildings to remain the primary focus within the courtyard.
562. Prominent buildings within the setting of the heritage assets are 22 Bishopsgate, which establishes a datum height and forms the set piece of the Eastern Cluster. It steps down to the north to the Leadenhall Building and to the south Tower 42. The presence of the tall buildings of the Eastern Cluster can be felt within the setting of the heritage assets introducing a considerable new height element. Their material palette of modern glazed panels contrast strongly with the decorative stonework of the Guild Hall Buildings. Their presence is also indicative of a wider area of transformative urban change within this part of the City.

Impact

563. The GLA have identified harm to the setting of The Guildhall, listed Grade I, former Guildhall Library and Museum, listed Grade II*, Church of St Laurence Jewry, listed Grade I and the Guildhall Conservation Area. They state that: *View C18 shows the impact of the proposed development on The Guildhall, listed Grade I, former Guildhall Library and Museum, listed Grade II*, Church of St Laurence Jewry, listed Grade I and the Guildhall Conservation Area. The east wing of the Guildhall is backdropped by the proposed development, which appears as a visually incongruous element, breaching the roofline and parapet. This is considered to cause harm at the low to medium end of the less than substantial scale.* This is addressed below.
564. In View C18 the proposed development would appear in the background of the view within the western part of the City cluster, behind the southern façade of the Guildhall. The upper third of the tower appears above the

roofline of Tower 42. Its lower levels are wholly obscured by the Guildhall Art Gallery in the foreground of the view.

565. Users of Guildhall Yard will experience different kinetic views as they move around the area with the proposed tower and other buildings of the Eastern Cluster appearing in and out of view. The main focus, however, would be on the immediate foreground of the view, comprising the historic architectural ensemble of buildings and the courtyard, and the interaction between them.
566. The proposed tower would be understood as part of the existing Eastern Cluster due to the similarity in architectural design, materiality and form. The skyline gap between the new tower and 22 Bishopsgate allows the proposed development to be understood as a distinguished architectural form within the view with the upward tapering of the taller elements helping to minimise the perception of massing to appear as a more slender form.
567. It is considered that the development would have a neutral impact as it would be seen against the backdrop of the listed Guildhall Buildings within the foreground view. The experience of receptors would primarily consist of kinetic views where the proposed development would come into and out of view as one moves around the courtyard area. Where the building is visible it would be seen as forming part of the established Eastern Cluster and read as part of this established tall building context. The effect on the heritage assets is not therefore significant.
568. Officers consider that since the development would be seen in the backdrop of the listed building as part of the Eastern Cluster along with other large towers it would not be considered harmful to the significance or setting of the listed buildings.

St Lawrence Jewry (Grade I)

Significance:

569. The Church of St. Lawrence Jewry (Grade I) stands on the north side of Gresham Street, next to Guildhall and is located within one of London's most historically sensitive environs.
570. St Lawrence Jewry Church has been used as a place of worship since the 12th century and is believed to have been founded in 1136. The medieval church was destroyed in the Great Fire and was rebuilt by Sir Christopher Wren between 1670 and 1687. The Baroque church is entirely faced in Portland stone, with a grand east front, on which four attached Corinthian columns, raised on a basement, support a pediment placed against a high attic.

571. The Church is of high significance for its, architectural, artistic, and historical interest. The building contributes to the settings of a number of other listed buildings in the Guildhall Conservation Area.

Setting:

572. The Church of St. Lawrence Jewry is located to the southwest of the Guildhall enclosing the Central Courtyard with other Guildhall buildings and read as one architectural ensemble of the Guildhall.

573. The courtyard provides open and uninterrupted views of the Church which contrasts with the intensity of urban development which surrounds the wider site.

574. The presence of the church tower in the immediate setting and its skyline silhouette are of core importance in conveying the architectural and historic significance of the church and a landmark civic piece. There is also a strong axial relationship with Gresham Street here which is quite 'formal' for a City church.

575. Beyond the buildings surrounding the courtyard, various phases of development appear, which are modern in character but of a similar scale, form and facing material to the historic buildings of the Guildhall and Church.

576. Prominent buildings within the setting of these heritage assets are 22 Bishopsgate, which establishes a datum height within the frame and forms the set piece of the Eastern Cluster. It steps down to the north to the Leadenhall Building and to the south it steps down to Tower 42. The presence of the tall buildings of the Eastern Cluster can be felt within the setting of the Church introducing a considerable new height element. This can also be experienced from views of the Church looking east along Gresham Street where the Towers of the City cluster can be seen within the backdrop of the Church tower and spire. Their material palette of modern glazed panels contrasts with the decorative Portland stonework of Church of St Laurence Jewry and their presence is indicative of a wider area of transformative urban change within this part of the City.

Impact

577. The GLA have identified harm to the setting of the Church of St Laurence Jewry, listed Grade I and the Guildhall Conservation Area. They state that: *View C18 shows the impact of the proposed development on The Guildhall, listed Grade I, former Guildhall Library and Museum, listed Grade II*, Church*

of St Laurence Jewry, listed Grade I and the Guildhall Conservation Area. The east wing of the Guildhall is backdropped by the proposed development, which appears as a visually incongruous element, breaching the roofline and parapet. This is considered to cause harm at the low to medium end of the less than substantial scale. This is addressed below.

578. In View C18 the proposed development would appear in the background of the view within the western part of the City cluster, behind the southern façade of the Guildhall. The upper third of the tower appears above the roofline of Tower 42. Its lower levels are wholly obscured by the Guildhall Art Gallery in the foreground of the view.
579. Users of Guildhall Yard will experience different kinetic views as they move around the area with the proposed tower and other buildings of the Eastern Cluster appearing in and out of view. This similar experience would also be had from Gresham Street with kinetic views looking east towards the Church of St. Lawrence Jewry. The main focus in these views, however, would be on the immediate foreground of the view, comprising the historic architectural ensemble of buildings and the courtyard, and the interaction between them.
580. The proposed tower would be understood as part of the existing Eastern Cluster due to the similarity in architectural design, materiality and form.
581. It is considered that the development would have a neutral impact as it would be seen within the backdrop of the listed Church of St. Lawrence Jewry within the foreground view. The experience of receptors would primarily consist of kinetic views where the proposed development would come into and out of view as one moves around the immediate area. Where the building is visible it would be seen as forming part of the established Eastern Cluster and read as part of this established tall building context.
582. Officers consider that the development would not detract from the Church of St. Lawrence Jewry's facades given that the development would be seen in the backdrop to the listed building along with other large towers within the Eastern Cluster. It would not be harmful to the significance or setting of the listed building.

Guild Church of Ethelburga (Grade I) –

Significance:

583. The Guild Church Of Ethelburga (Grade I) dates from the late C14 to early C15 with later alterations from the C20 by Sir Ninian Comper. It was built on

the site of an older church and incorporates some of the material from this earlier structure. The church is built out of ragstone and brick with stone dressings and quoins to the tower. It has a four-bay nave with a southern aisle and a western tower.

584. The church derives historic interest as a remnant of the medieval city in this location, and one of only eight pre -Great Fire churches surviving in the City of London. The church derives further architectural interest owing to the survival of features dating from the C14, particularly on its principal exterior elevation which fronts Bishopsgate. It is also listed for its interesting interiors.

Setting:

585. The Guild Church has a strong relationship with Bishopsgate which forms a significant part of its immediate setting. Bishopsgate is an ancient routeway and the surviving historic street pattern contributes to the heritage value of the Church. Its setting is comprised of Victorian and Edwardian townscape interspersed with significant tall buildings including Heron Tower, 99 Bishopsgate, Tower 42 and 100 Bishopsgate adjacent to the north.
586. The Church is modest in size and is now dwarfed by modern tall buildings. This relationship now forms a significant part of Guild Church's setting with the sublime contrast between what at once was Bishopsgate's tallest building to the high finance towers that now occupy this part of the City.
587. At street level the historic character of the church with its C14 features and distinctive C18 bell turret stands out prominently within the street scene. The architectural value of the church is best appreciated on approach from the north and south, where the short western tower rises above the ragstone wall. The proposed development site is located almost directly opposite the church the current building of which sits quietly within its setting reflecting the scale, proportion and construction materials of nos. 52-68 Bishopsgate opposite.

Impact:

588. The proposed development will be a new, prominent feature immediately to the west of the listed building which has its principal elevation to Bishopsgate.
589. The scale of the proposed building and its low-level treatment will result in change to the character of the urban realm immediately opposite the site. The new entrance, framed by the bronze frame will be prominent in views with the listed buildings, introducing a new ground floor experience that would enliven the street scene. Ground floor views will be opened up providing more direct views onto the listed building which would be appreciated by more pedestrians. The linear and contemporary nature of the proposed building's

form and materials reinforce the contrast between the rag stone and facade of the historic building.

590. The proposed development will add to the Eastern Cluster of modern skyscrapers and would contrast strongly with the smaller scale of the historic environment. The scheme will, therefore, be highly visible and a prominent addition within the setting of the listed building. The church, however, derives its principal significance from its exterior façade which fronts Bishopsgate and is best appreciated in close up views when one is orientated away from the development site.
591. The absolute change in daylight and sunlight St. Ethelburga's Centre is insignificant from the 'Proposed Development' and in Cumulative scenarios. This is further assessed in detail in the relevant section of the report.
592. It is considered that the proposed development would have a neutral impact and would not harm the setting of the listed building or affect the ability to appreciate its significance as a heritage asset. It is also considered that there would be some benefits in the opening up and creating more active frontages which would allow more direct views onto the listed building.

Church of St Helen (Grade I)

Significance:

593. The Church of St. Helen's at Bishopsgate (Grade I) is a rare survival of a medieval building in the City of London. It dates back to a Benedictine priory for nuns which was founded in 1210. The current church dates to the 13th century with a chapel added in the 14th century. It is built of partly rendered rubble, brick and ashlar. The building is unusual in that it has two parallel naves of the same height, doubling the church's floor space. In 1992 and 1993 IRA bombs caused damage to the church. Despite some reordering of the interior many internal fixtures and decorative elements installed in the 15th to 19th centuries have survived and contribute to the building's historic interest and significance.
594. The historic importance of the church is closely tied to its position as one of the few medieval buildings – and only one of two churches – in the City of London to have survived damage inflicted on London's buildings as a result of events such as the Fire of London and Second World War. The use as a parish church and by the nuns from the priory and the second nave to be used exclusively by them, is a noteworthy aspect of the history of this City church.

595. Much heritage value in the building's architectural interest lies in the age of the fabric, the oldest parts of which date to the 13th century, with additions and alterations of the 14th century onwards. St Helen's contains medieval and early modern monuments and tombs of a number of notable individuals, which adds to its historic associations. St Helen's was also the parish church of William Shakespeare when he lived in the area in the late 16th century. Much architectural value lies in the age of the fabric and the fact that it is one of only two surviving gothic churches in the City of London.

Setting:

596. The setting of the church is characterised by a collection of fine-grained Victorian, Edwardian and recent buildings within the close setting in the St Helen's Place Conservation Area. These were typical of the church's wider setting until the later-20th century.

597. There is an important vista of the Church within its churchyard setting which can be appreciated looking east along Great St. Helen's between nos. 22 and 42-44 Bishopsgate. The Church's relationship with the medieval alignment of Great St Helen's is also an important element of its setting along with its architectural relationship with the historic plots and building lines of the Conservation Area.

598. There is a strong contrast between St Helen's Church and the modern tall buildings of the City's Eastern Cluster, which lie in close proximity to the church. This includes, Aviva Tower, the Leadenhall Building, Tower 42 – and 100 Bishopsgate and 22 Bishopsgate, to the north and south.

599. The setting of the church today is characterised by these long-established contrasting modern buildings that characterise this part of the City of London townscape.

Impact:

600. The proposed development will be a new, prominent feature located to the west of the Church. The main tower and most of the satellite building will be seen almost in their entirety from within the immediate setting of the church and from viewpoints looking west. The east elevation of the main tower will fill in the sky gap adjacent to Tower 42.

601. The linear and contemporary nature of the building's form and materials will contrast with the natural stone and ornate facades of the historic buildings of the church. The proposed development will add to the City of London Eastern Cluster which is characterised by modern skyscrapers that contrast with the more modest historic buildings which are of a much smaller scale. The scale

of more recent development enclose the Conservation Area to the north, south and east with St. Helen's Church now appearing as an isolated medieval element in this context, nestled in the layered townscape.

602. The absolute change in daylight and sunlight at Great St. Helen's Church is insignificant from the 'Proposed Development'. The 'Cumulative Effects' would result in daylight changes to Great St. Helen's Church. This is further assessed in the relevant section of the report.
603. The scheme will be highly visible and prominent addition within the setting of the church as is characteristic of the existing setting to the heritage receptor. This would result in some distraction from the listed building, however, given that the development would be seen in the backdrop of the heritage asset as part of the Eastern Cluster along with other large towers it is not considered harmful to the significance and setting of the listed building.

City of London Club, Old Broad Street (II*)

Significance:

604. The building derives historic interest as one of the earliest purpose-built Gentleman's club. It derives further historic interest owing to its association with notable members including Arthur Wellesley, 1st Duke of Wellington and Robert Peel. Prince Phillip, Duke of Edinburgh was its Royal Patron. The building has architectural value by virtue of its principal elevation which is a well preserved early 19th century Neo-Classical façade, articulated by the symmetrically placed sash windows, order of Doric pilasters to first floor and with pedimented windows enriched at centre.

Setting:

605. The immediate setting is the narrow, historic street of Old Broad Street, one of the twenty five ancient wards of the City of London, and positively contributes to an understanding of the historic location of this this medieval route. Much of the historic setting has been eroded and this is evident in the buildings which date from a number of architectural styles and eras, situated along Old Broad Street. Appearing behind the principal façade are the tall buildings of the City Cluster their height and contemporary style of architecture establishes a dominating contrast with the historic character and small scale nature of the City of London Club.

Impact:

606. The proposed development would be visible as a prominent addition to the skyline in views looking northeast towards Bishopsgate, seen at some points

behind the principal elevation of the building. The development would be seen as an addition to the existing and emerging tall building context along Bishopsgate. Whilst the Proposed Development would be prominent and potentially distract from the detail of the principal elevation of the building in some views, it is characteristic of the commercial centre of this part of the City and is not a new element or disruptive feature out of context.

607. It is considered that the proposed development would have a neutral impact and would not harm the setting of the listed building or affect the ability to appreciate its significance as a heritage asset.

Tower of Former Church of St Augustine (Grade I)

Significance:

608. St. Augustine Church was rebuilt following the Great Fire of 1666 in 1680-4 by Sir Christopher Wren. The main body of the church was destroyed in 1941 during the blitz leaving only the bottom two stages of the tower complete with the four obelisk finials. The spire of 1830 that was destroyed was reconstructed in a scholarly manner by Paul Paget of Seely and Paget in 1967.
609. The tower derives historic interest as a surviving 1695-6 Wren tower with post-war restored Hawksmoor spire that forms an ensemble of outstanding special interest. It is one the more admired City church spires with its spire culminating in the distinctive elongated onion dome. It has particularly strong group value being the closest of the City Churches to Wren's Cathedral. Although the most characteristic feature is post-war in date and the church body is now lost, it remains a special landmark tower, both for its original design and for its strong relationship with St Paul's.

Setting:

610. The Tower of Former Church of Augustine has a carefully considered architectural relationship with the mother Cathedral Church of St. Paul's. The group value of these buildings within views having become iconic.
611. The Church Tower with its elegant spire, as seen in strategic riparian views from the River Thames, is seen as part of a wider 'Wren-scape' of steeples and spires and forms an important aspect of the City of London's skyline. Attached to the north is the Grade II* St Paul's Cathedral Choir School which was built in 1962-67 which now forms part of its immediate setting.

612. The church tower has a backdrop of midrise development which comprise postmodern and 21st century commercial buildings. In kinetic views looking eastwards along St Paul's Church Yard a number of towers of the Eastern Cluster can be seen in the backdrop of St. Augustine's Tower including 22 Bishopsgate, Tower 42, 122 Leadenhall Street and 20 Fenchurch Street which in some views affect the profile of the distinctive church tower spire from being fully appreciated within the skyline.
613. The closer the kinetic views are to the church tower the skyscrapers of the Eastern Cluster start to recede from view and the spire and central tower, aided by its setback location forms the dominant centrepiece of the view and the architecturally unique roof profile can be seen clearly against the skyline.

Impact:

614. The GLA has raised concerns with the impact of the proposed development on the setting of the Tower of Former Church of St Augustine. They identify in HTVIA View 31 as illustrating the impact of the proposed development on the setting of the Church of St Augustine. They state that: *The impact here is severe, since the proposed development pops up to the right of page 15 the church spire in a visually incongruous way. This is harmful since it challenges the spire for primacy in the view. This is considered to cause harm at the low to medium end of the less than substantial scale.* This is addressed below.
615. The primary focus of HTVIA View 31 would be on the Grade I listed Church of St Augustine. The street already has a mixed townscape character which includes development of varying ages, scales and architectural styles, as well as an established context of tall and large development seen within its backdrop. In kinetic views looking eastwards along St Paul's Church Yard some of the towers affect the profile of the distinctive church tower spire from being fully appreciated against the skyline.
616. The proposed development is partially visible within the centre background of the view, but largely blocked by interposing development. Where visible the upper floors of the building will be visible above the roofline of development in the midground of the view. The sculptural form and upward tapering of the proposals is visible in this view which helps to reduce the perception of mass.
617. A skyline gap is retained between the proposed tower and the Grade I listed Church of St Augustine. The distinctive tower and spire would continue to dominate the view with the new tower appearing subservient to it. This taken with the contemporary form and glazed materiality of the tower would ensure that it would be understood as part of cluster of tall buildings on the periphery in the view.

618. Given the distance of the development site, within the City Cluster to the east, the proposed development would not have an adverse impact on the Tower's relationship with St. Paul's Cathedral. The proposed tower will also not impact on the riparian views with the tower and spire still appreciated with the skyline with other steeples and spires of the 'Wren-scape'.
619. Officers consider that the proposed development would have a neutral impact and would not harm the setting of the listed building or affect the ability to appreciate its significance as heritage asset.

Tower Bridge (Grade I)

Significance:

620. Tower Bridge was designed by the by the architect Sir Horace Jones, for the City of London Corporation in 1894 with engineering by Sir John Wolfe Barry. 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.
621. 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.

Setting:

622. Elements of setting which make a substantial/significant contribution to the significance and appreciation of the heritage asset are set out in relative order of contribution below:
623. The broad riparian views from the River Thames, its embankments and Bridges, including from London Bridge, Southwark Bridge, the Queen's Walk, the North Bank and Butler's Wharf. From here its commanding, strategic siting, architecture and silhouette stands sentinel, guarding the entrance to central London from the sea and as a City (and London) Landmark. That strategic siting and historic intrinsic connection with the operational River Thames is accentuated when appreciated in a 360 degree panoramic context with those other defining landmarks and features of the historic Pool, including City Hall, the Tower of London, the Monument, St Paul's Cathedral, Old

Billingsgate and the London Custom House. In addition to those the remains of the quays, wharfs and warehouses of the historic Pool contribute to a wider familial shared setting. These collectively make a substantial contribution to significance and an appreciation of it.

624. The local and wider townscape views/approaches, many of which are coincidental and fortuitous, perhaps the most important from in and around the Liberties of the Tower of London, from main vista at 'More London' on the South Bank and others which are more fortuitous, even incidental, townscape moments/glimpses where its inspiring architectural form makes an unexpected announcement. This includes broad panoramas such as from Greenwich Park (where it is seen alongside St Paul's), where the strategic role of the Pool of London is announced by its towering and dramatic architectural form and silhouette. These make a significant contribution to significance and an appreciation of it.

Impact:

625. The GLA have identified less than substantial harm to the setting of Tower Bridge. They state that: View 22 shows the impact of the proposed development on Tower Bridge, listed Grade I. Although there is increased visibility of new development in the context of Tower Bridge, generally, the proposed development appears as part of a cluster of modern taller buildings in these views and the harm caused to the setting is considered to be at the very low end of the less than substantial scale. This is addressed below.
626. The proposal would be seen within views of Tower Bridge from the South Bank of the River from the east looking west from Butler's Wharf shown in View 22 in the TVIA as well as other westerly long distance and river views. In the baseline scenario, the proposal would be partially visible appearing to the rear-right of the City Cluster in these views. It would appear in the backdrop of the tallest existing buildings in the cluster and would help to improve the skyline effect as the buildings taper down to each side.
627. 55 Bishopsgate would not draw in the eye in this view, given its position at the rear of the existing building cluster and being of a similar architectural language to the adjacent skyscrapers. The building would not change the existing composition of the view nor the visual focus in the view.
628. Considering other long distance and river views it is considered that the proposed development would appear peripheral and harm would not be caused to the setting of Tower Bridge nor to the group value of the elements of setting identified above.
629. Officers consider that the proposed development would be understood and read as forming part of the established City cluster context and would not

detract from the setting of Tower Bridge. The proposed development does not alter the overarching character or focus of the view nor will it affect the ability to appreciate its significance as a heritage asset.

630. In the cumulative scenario, 55 Bishopsgate would be entirely obscured within the view by interposing tall buildings in the City cluster, mainly 1 Undershaft which would become the tallest building in the cluster and would eliminate the presence of the Building from the view.

Liverpool Street Station (grade II)

Significance:

631. Liverpool Street Station is one of the great Victorian symbols of the Railway Age and the principal gateway to the City from the East, accruing high historic interest. One of the last London termini to be built, its significance is also derived from its architectural interest and sophisticated engineering. The western trainshed was undertaken by Edward Wilson in 1873-1875 before subsequent expansion by W.N. Ashbee in 1894 with another trainshed and a series of Flemish-style frontages. Thus becoming the largest London terminus of the period, Wilson utilised gothic detailing to the brick work which together with expansive structural ironwork created a cathedral-like nave and transept. A later 1985-1992 extension has been recognised in its own right for a considered conservation lead scheme which continued the detailing and form of the original structure. The later extension is illustrative of contemporary conservation movement with its own architectural historic interest. Considerable commemorative value is also retained, through a number of monuments including the Great Eastern Railway First World War Memorial, the London Society of East Anglians First World War Memorial. Additionally the station is association with the arrival of the Kindertransport evacuees into London, bringing 10, 000 unaccompanied children into London, commemorated with a memorial just to the south in Hope Square.

Setting:

632. Setting makes a positive contribution to the significance of the building, despite recent and late twentieth century development to the east and north screening the full extent of the train sheds from view from the majority of the surroundings. Views of the station entrance from Bishopsgate are seen together with the Great Eastern Hotel (Grade II*) make a particularly strong contribution, revealing the historic functional relationship between the two buildings. Similarly Hope Square to the south west corner provides a small open space with a civic quality which show cases the southern elevation and Metropolitan Arcade.

Impact :

633. The proposed development would be visible from Exchange Square in HTVIA C20 with the historic train shed roof profile in the foreground as a striking composition. The development would form part of the already established tall building setting which is a prominent feature and typifies the juxtaposition of historic building and city cluster whilst remaining entirely distinct of one another. The proposals are seen as forming the western part of the cluster, sitting comfortably between 22 Bishopsgate and Tower 24. The upward tapering of the taller elements of the proposed building minimises the perception of its massing, and it appears as a slender, elegant addition to the existing built forms, reinforcing the interesting character of the skyline. The building creates a more harmonious skyline composition, creating a staggered massing effect as the building forms slowly taper down from the proposed development which is positioned at the edge of the cluster.
634. The proposed development would have a neutral impact and would not harm the setting of the listed building or affect the ability to appreciate its significance as a designated heritage asset or impact on other elements of setting which contribute to significance. .

Great Eastern Hotel (grade II*)

Significance:

635. It was built in 1880-84 by Charles & C.E. Barry, it was later altered and extended towards Bishopsgate by Edis in 1899-1901. It was originally built as a hotel for the Great Eastern Railway. It is constructed of red brick with Portland Stone to the ground floor and red Corsehill stone above. Its historic and architectural interests are well preserved exemplifying a late 19th century purpose built station hotel. It derives further historic interest owing to its association with the Great Eastern Railway, established in the mid-19th century, it connected eastern areas of Britain to London. The architectural interest is derived from its principal exterior constructed in the Renaissance with Flemish style with a particularly accomplished as a front piece to Liverpool Street Station. The building contains a series of function rooms in a range of styles which were designed to cater to hotel guests and the wider working population of the City and are expressive of social activity in the later-C19 and the status of terminus hotels. The hotel has group value with Liverpool Street Station, with which it has a strong historical and functional relationship.

Setting

636. As for Liverpool Station the setting makes a positive contribution to the significance of the building, despite recent and late twentieth century development to the east and north screening the full extent of the train sheds from view from the majority of the surroundings. Views of the station entrance from Bishopsgate are seen together with the Liverpool Street Station make a particularly strong contribution, revealing the historic functional relationship between the two buildings. Similarly Hope Square to the south west corner

provides a small open space with a civic quality which show cases the southern elevation and Metropolitan Arcade. The hotel is best appreciated in close up views of its principal elevation, from which the site cannot be seen, due to the presence of interposing development.

637. Impact The Proposed Development will be a prominent addition to the skyline to the south of the which will be readily visible in views from outside the listed building and within its immediate setting. One such view on approach to the site is shown in AVR View 47. The profile and ornate roof profile of the building will not be affected by the proposed development and whilst a prominent new addition within the wider setting, will not affect the ability to appreciate significance. The scale and appearance of the building is entirely in accordance with the established townscape setting of the listed building.
638. The proposed development would have a neutral impact and would not harm the setting of the listed building or affect the ability to appreciate its significance as a designated heritage asset.

St Helens Place Conservation Area

639. Whilst the GLA draw attention to impact any identified harm is focussed on 52-68 Bishopsgate and not on the Conservation Area. Historic England raise no objections. There are several third party objections including from the Leathersellers to the impacts and these are detailed in the consultation section and addressed below. Issues relating to overshadowing are addressed in the Daylight and Sunlight analysis of the report.

Significance:

640. St. Helen's Place Conservation Area is a small, tightly defined area on the east side of Bishopsgate, in close proximity to the Bank Conservation Area and in the heart of the City. It is the sole survivor of an intricate pattern of spaces and alleys which once connected Bishopsgate and St Mary Axe. The heritage value of St Helen's Place CA is derived from its historic character, articulated by its tight-knit urban grain, medieval layout of streets and alleyways, and inclusion of two nationally important pre 1666 churches. St Helen's Church in particular remains as one of the most important pieces of medieval fabric surviving in the City. Its 13th century origins are still seen, as well as the physical manifestation of the building's organic history. There is considerable archaeological potential for the extensive precinct of the Priory of St Helen which for centuries influenced the form of the area.
641. The area continues to have deeply rooted associations with the Leathersellers Company whose architectural patronage from the reformation onwards exerted a massive influence on the area and continues to shape its development. Associations with Canadian exploration through the Hudson's

Bay company and St Ethelburga's church. St Helens Place is Edwardian, and a formally planned enclosure which is unusual in the City and provides a quiet and delightful contrast to the surrounding City Cluster and activity of Bishopsgate. There is an important group of three buildings with narrow plot widths that are the only survivors of the finely-grained appearance of Bishopsgate before the combination and redevelopment of building plots from the 20th century onwards. They give an indication of how Bishopsgate would have looked in the 19th century and with the larger buildings elsewhere illustrating the development of the street. Accordingly, they are significant components of the conservation area. They offer important contrasts to the ongoing planning and development of tall buildings along Bishopsgate as part of the Eastern City Cluster. Hasilwood House provides an arched public entrance and enclosure to St Helens Place a discreet enclave of a type that is unusual in the City

Setting:

642. The Conservation Area has a uniquely nationwide context, a dramatic setting among the tall buildings of the City Cluster. This is by virtue of the City's function as a commercial and financial hub. The Conservation Area borders the site on its western boundary, and the site forms a key component of its immediate setting, on the opposing side of Bishopsgate. The current building on site is of a mediocre architectural quality and is an undistinguished, neutral element within the Conservation Area's wider setting. The published Character Summary for St Helen's Place CA does not note specific views, but the views into and within St Helen's Place are clearly of importance; here, again, the backdrop of the tall buildings of the Cluster makes for a dramatic juxtaposition with the Edwardian CA buildings in the foreground. Views up and down Bishopsgate and looking east at St Helen's Church share this quality; nowhere in the conservation area are the presence of tall buildings not felt to some degree and this is intrinsic to its setting.

Impact:

643. The Conservation Area lies within the Eastern City Cluster policy area for tall buildings. The dramatic setting among the tall buildings of the City Cluster is identified as a key characteristic which contributes to the special interest.
644. The Proposed Development will be a new, prominent feature immediately to the west of the Conservation Area and will be seen almost in its entirety from within the quiet reflective area in St Helen's Place and this is where the change in setting would be the most impactful. The east elevation of the main tower will create a new backdrop to the Grade II listed building at 52-68 Bishopsgate and enclose the view to the west, thus changing the character and experience of this part of the Conservation Area. This relationship is demonstrated in AVR View 50. The linear and contemporary nature of the building's form and materials reinforce the deliberate juxtaposition between

the natural stone and ornate facades of the historic buildings. The reflective materiality, simple and minimal façade allows the feature to appear still somewhat legible against its background. This is further reinforced by the dark bronze mega frame which contrasts with the light materiality of the listed building which enables the cupola to still stand out to an extent.

645. The Proposed Development will add to the existing contrast established by the presence of modern skyscrapers and the historic environment which is of demonstrable smaller scale. Moving around the Conservation Area, outside of St Helen's Place itself, the experience of the commercial centre and these juxtapositions is even more pronounced. The scale of more recent development in baseline and cumulative scenarios enclose the CA to the north (100 Bishopsgate), south (1 Undershaft and 22 Bishopsgate) and east (30 St Mary Axe). St Helen's Church is an isolated medieval element in this context, nestled in a layered townscape including a number of tall buildings. The scheme will be highly visible and prominent addition within the setting of the Conservation Area as is characteristic of the existing setting.
646. The location and a significant loss of clear sky to the western boundary to St Helens Place results in a overbearing presence and the Fibonacci, Satellite building and the existing Tower 42 would collectively read as a wall of layered development which would dramatically change the character and appearance of this part of the Conservation Area. The tight positioning behind Hasilwood House and the vast expanse of the facade which would be visible would result in a more assertive backdrop within St Helens Place compared to other towers to the south. These are experienced as individual silhouettes at a tangent framed by sky and have a playful sense of peeping over the rooftops of St Helens Place.
647. In this case it is considered the development would cause a slight degree of harm to the significance principally due to the more imposing and therefore distracting presence which could compete with the quiet human scale of St Helens Place, a unique enclave and key element of the Conservation Area significance. However given the established setting of tall buildings it is considered that harm in this case would be slight being a low degree of less than substantial harm.

Bank Conservation Area:

Significance:

648. Bank Conservation Area was first designated in 1971 with the Supplementary Planning Document adopted January 2012. The area comprises the commercial heart of the City of London around Bank Junction.

649. 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. The contrast of medieval street plan, 18th and 19th century buildings and modern office developments is the quintessential character of the City of London.
650. 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 connection of financial power 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. The Bank Conservation Area combines architectural, historic and social heritage value.

Setting:

651. 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 and Gracechurch Street. The wider setting of the Conservation Area is characterised by a backdrop of tall buildings to the east providing a strong contrast between old and new.
652. Bank Conservation Area is also bordered by Finsbury Circus Conservation Area to the north, Guildhall Conservation Area to the West and Leadenhall Market Conservation Area to the east which all form an important part of its setting.
653. The Thames and London Bridge also contribute to setting providing significant views of buildings within the conservation area including those of the Wren churches.
654. The character of Bank junction as a historical centre is 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.
655. The development site at present makes a neutral contribution to the setting of the conservation area being seen in limited north easterly views along Bishopsgate at the eastern boundary of the conservation area close to the junction with Threadneedle Street.

Impact:

656. The GLA considers that the proposal would cause some harm to the setting of the Bank Conservation Area. In its consideration of heritage assets under Paragraph 70, in which the Bank Conservation is referred, they state that: *The proposed building appears in the view at an overwhelming scale in relation to the heritage assets; views along streets are visually stopped, often with the last remaining view of sky along the street blocked and heritage assets are backdropped by the proposed development. These effects are considered to cause harm at the low to medium end of the less than substantial scale to both the setting of listed buildings and the conservation areas.*
657. In their assessment they refer to Views 43, 44 and 48 which they have determined show the street level effects on the setting of the Conservation Area.
658. A letter of objection has also been received from Max Skjoldebrand an architect who was a former senior member of the project team at Fitzroy Robinson Partnership for the design and construction of the existing development currently at 55 Bishopsgate. Under paragraph 9 he states that: *The bulk and massing of the proposed 63 storey tower will have a serious impact on the important townscape views from the nearby Bank, St Helens Place, Finsbury Square and Bunhill Fields conservation areas.*
659. Under paragraph 19 point 5 he considers that significant harm would be caused to HTVIA: View 42, Bank Junction. This is addressed below.
660. The proposed Development will be prominently visible in views moving through the Conservation Area looking north. AVR Views 43, 44 and 48 demonstrate the proximity of the existing buildings in the eastern cluster and the interaction between the historic townscape of the Conservation Area and the character of the 21st century commercial centre. This contrast illustrates the character of the City of London which is noted as an important part of that significance.
661. Officers consider that the proposed development will reinforce these well-established relationships and juxtapositions without harming the setting, intrinsic character and history or the significance of the designated Conservation Area.

Leadenhall Market Conservation Area

Significance:

662. Leadenhall Market Conservation Area was designated on the 16th May 1991 and extended in June 2007 to include 37-39 Lime Street and 34-3 Lime Street.
663. The Conservation Area is relatively small being dominated by Leadenhall Market and its associated buildings. The street layout of the Conservation Area is a result of the various phases of development that the conservation has undergone. This has resulted in a combination of irregularly aligned medieval streets and narrow alleyways, overlaid with the Market complex creating a layout unique to this part of the City.
664. The heritage value of the conservation area is derived from the Conservation Area's dominance of the Victorian buildings of Leadenhall Market which are an outstanding example of a Victorian market and offer a remarkably cohesive and immersive experience. This is enhanced by the contemporary vibrant mix of uses and activity, which strongly compliment the predominant financial and insurance activities in the area.
665. The conservation area derives further historic interest owing to its highly significant archaeological remains relating to the 1st century Basilica Forum and medieval Leaden Hall. As well as the preservation of the medieval street plan, comprising 19th century market buildings which offers an intricately layered plan form with retained historic thoroughfares throughout.

Setting:

666. The immediate setting of the CA comprises a rich mix of architectural styles and eras, which reflect the various stages of development that this part of the City has undergone. AVR Views 48 shows the tall buildings of the Eastern Cluster are visible in views looking north along Gracechurch Street. They introduce a considerable new height element within the immediate setting of the market. Due to the enclosed and inward looking nature of Leadenhall Market and its associated buildings, its immediate setting, bar its historical location within the former commercial hub of the City contribute little to the appreciation of its heritage value.
667. The development site and Conservation Area are visually separated by intervening development and the existing building is not currently experienced in its setting.

Impact:

668. The GLA considers that the proposal would cause some harm to the setting of the Leadenhall Market Conservation Area. In its consideration of heritage assets under Paragraph 70 of their Stage 1 Report, in which the Leadenhall

Market Conservation Area is referred, they state that: *The proposed building appears in the view at an overwhelming scale in relation to the heritage assets; views along streets are visually stopped, often with the last remaining view of sky along the street blocked and heritage assets are backdropped by the proposed development. These effects are considered to cause harm at the low to medium end of the less than substantial scale to both the setting of listed buildings and the conservation areas.*

669. In their assessment they refer to View 48 which they consider shows the street level effects on the setting of the Conservation Area. This is addressed below.
670. The conservation area covers the area of the enclosed nature of the market. The intrinsic significance of the conservation area lies in its architectural interest and commercial history as a shopping parade and is therefore enclosed and inward looking. As previously stated the immediate setting of the conservation comprises a rich mix of architectural styles and eras, which reflect the various stages of development that this part of the City has undergone including the tall buildings of the Eastern Cluster in which the new development would form a part.
671. Officers consider that the proposed development within the Conservation Area's wider setting will have no adverse impacts on the setting or appreciation of the significance of the Leadenhall Market Conservation Area.

Guildhall Conservation Area

Significance:

672. The Guildhall Conservation Area was designated in 1981 and its boundaries were readjusted in 1991 and 2007. It comprises the Guildhall buildings and adjoining urban blocks and those between Gresham Street and Cheapside. The Bow Lane Conservation Area lies directly to the south.
673. The City's civic administration developed in the early medieval period. The City flourished and became an important trading place that eventually established an independent governing body, the City Corporation headed by a mayor. A predecessor of the Guildhall building can be traced back to this time. The current building dates from the early 15th century and is today listed at Grade I. It was altered and extended in the 18th and 19th century.
674. Several livery companies established their halls along Basinghall Street in the proximity of the Guildhall. The Guildhall survived the Great Fire, but the surrounding livery halls were destroyed. Guildhall Yard is one of the few large squares in the City and provides the only public space in the conservation

area. The street pattern, which had been retained after the Great Fire, is characterised by narrow alleys, courtyards and predominantly small building plots. Only King Street and Queen Street were cut through the surviving medieval fabric after the Fire to create a procedural route from the River Thames to the Guildhall Yard. Frederick's Place was a speculative development built by the Adam brothers. Gresham Street was laid out around the middle of the 19th century, connecting various older lanes. During World War II bombings, this area of the City was badly affected and many buildings lost.

675. The heritage value of the Conservation Area is derived in its historic commercial and administrative association with the Guildhall and Livery Companies which historically have dominated the form, function and architectural character of the CA.

Setting:

676. The Conservation Area borders Bank Conservation Area on its eastern boundary and the two have a close visual and functional relationship. There are significant views in and out of the area such as those towards Tivoli corner and along Old Jewry.
677. Beyond the conservation boundaries, various phases of development appear, which are more modern in character but of a similar scale, form and facing material to the historic / contemporary buildings within the Guildhall Conservation Area. These buildings sit quietly within the background and do not harm the setting of the Conservation Area.
678. More prominent buildings within the setting of the Conservation Area are set further afield comprising buildings of the City Cluster including 22 Bishopsgate, which establishes a datum height and forms the set piece of the Eastern Cluster. It steps down to the north to the Leadenhall Building and to the south Tower 42. The presence of the tall buildings of the Eastern Cluster can be felt within the setting of the heritage asset introducing a considerable new height element. Their material palette of modern glazed panels contrast strongly with the more solid and decorative masonry buildings within the Conservation Area. The presence of the City Cluster is indicative of a wider area of transformative urban change within this part of the City and a key part of the Conservation Area's immediate setting.
679. Due to the extent of intervening development, the current development site is not experienced within the setting of the Conservation Area.

Impact:

680. The GLA considers that the proposal would cause some harm to the setting of the Guildhall Conservation Area. In its consideration of heritage assets under Paragraph 72 of their Stage 1 Report, they state that: *View C18 of the TVIA it shows the impact of the proposed development on The Guildhall, listed Grade I, former Guildhall Library and Museum, listed Grade II*, Church of St Laurence Jewry, listed Grade I and the Guildhall Conservation Area. The east wing of the Guildhall is backdropped by the proposed development, which appears as a visually incongruous element, breaching the roofline and parapet. This is considered to cause harm at the low to medium end of the less than substantial scale.* This is addressed below.
681. In View C18 the proposed development would appear in the background of the view within the western part of the City cluster, behind the southern façade of the Guildhall. The upper third of the tower appears above the roofline of Tower 42. Its lower levels are wholly obscured by the Guildhall Art Gallery in the foreground of the view.
682. Visitors to the Guildhall Conservation Area will experience different kinetic views as they move around the area with the proposed tower and other buildings of the Eastern Cluster appearing in and out of view. The main focus, however, would be on the immediate foreground of the view, comprising the historic architectural ensemble of buildings and the interaction between them.
683. The proposed tower would be understood as part of the existing Eastern Cluster due to the similarity in architectural design, materiality and form. The skyline gap between the new tower and 22 Bishopsgate allows the proposed development to be understood as a distinguished architectural form.
684. It is considered that the development would have a neutral impact as it would be seen against the backdrop of buildings with those of the Guildhall Conservation Area being within the foreground view. The experience would primarily consist of kinetic views where the proposed development would come into and out of view as one moves around the courtyard area. Where the building is visible it would be seen as forming part of the established Eastern Cluster and read as part of this established tall building context. The effect on the Conservation Area is not therefore significant.
685. Officers consider that since the development would be seen in the backdrop of the conservation area as part of the Eastern Cluster along with other large towers it would not be considered harmful to the heritage value or significance of the Conservation Area having a neutral effect on its setting neither enhancing nor detracting from an appreciation of the heritage asset.

New Broad Street Conservation Area

Significance:

686. New Broad Street Conservation Area was designated in December 1981. The Conservation Area lies to the east of Finsbury Circus and south of Broadgate in the north-eastern part of the City.
687. The heritage value of the Conservation Area is derived in its uniformity in building scale across New Broad Street, coupled with the historical character, variety in ornament and proximity to the City Wall. Further historic and architectural interest is derived in All Hallows on the Wall (Grade I), which is considered a significant listed building within the Conservation Area along with the remains of City Wall beneath All Hallows Church and churchyard, nos. 82 and 83 London Wall and the junction of London Wall and Blomfield Street which are designated Scheduled Ancient Monuments.

Setting:

688. The Conservation Area is surrounded by a number of other Conservation Areas including Bank, Finsbury Circus, and Bishopsgate. The proximity of the Conservation Area to Finsbury Circus, comprising a formal area of green space with a surrounding high quality architectural, forms an attractive feature within the immediate setting of the New Broad Street Conservation Area.
689. The Conservation Area is located within close proximity to the tall buildings which form the Eastern Cluster. There are also a number of contemporary buildings including the Barbican Estate and those along Bishopsgate which illustrate the extent of post war change that has occurred within the City.
690. The proposed development site is located in close proximity to the Conservation Area situated directly to the southeast. Due to the extent of intervening development, the current development site is not visible within the Conservation Area's setting.

Impact:

691. The Conservation Area is located in the heart of the Square Mile's commercial district and its setting is characterised by tall development.
692. The Proposed Development will be a prominent addition to the skyline to the south of the Conservation Area which will be readily visible in views from within and at the boundary of the Conservation Area. The scale and appearance of the building reflects the established townscape forming part of the City Cluster which forms a significant part of the Conservation Area's setting.

693. Officers consider that the proposed development within the conservation areas setting will have no adverse impacts on the character and significance of the New Broad Street Conservation Area.

Bishopsgate Conservation Area

Significance:

694. Bishopsgate Conservation Area was designated in 2007 and included the former Middlesex Street Conservation Area, designated in 1981. The Conservation Area is located to the north of the development site.
695. The Conservation Area extends from Wormwood Street on its southern boundary, to Brushfield Street in the north. Bishopsgate was originally a Roman route travelling north out of the City.
696. The heritage value of the conservation area is defined by its staggered, more piecemeal redevelopment that occurred in the 19th and 20th centuries. This is in contrast to other areas of the City, which saw dramatic and transformative commercial development. This, combined with the Conservation Area's variety of uses (industrial, residential, commercial and transport) has led to a diverse character. The historic street layout and orientation of alleyways and squares is still visible, despite few houses remaining from this period. A significant townscape feature within the Conservation Area is Liverpool Street Station.

Setting:

697. The immediate setting of the Conservation Area is much changed with the recent expansion of the Eastern Cluster and large complexes such as the Broadgate Estate. The southerly setting of the Conservation Area is dominated by tall modern buildings at the northern edge of the City's Eastern Cluster including Dashwood House, 99 Bishopsgate and Heron Tower. These contemporary developments form attractive buildings within the Conservation Area's setting. The development site is partially visible from the northern part of the Conservation Area, in views looking south along Bishopsgate and is read in the context with the developments that align with both sides of the main road.
698. The proposed development site is located in close proximity to the Conservation Area situated directly to its southwest. Due to the extent of intervening development, the current development site is not visible within the Conservation Area's setting.

Impact:

699. The Bishopsgate Conservation Area is located in the heart of the Square Mile's commercial district. The area is well contained with a collection of historic Victorian and Edwardian buildings which sit beyond the original City walls and is read as separate to the tall buildings on its boundaries.
700. The proposed development will be a prominent addition to the skyline to the south of the Conservation Area which will be readily visible in views from within and at the boundary of the Conservation Area. The scale and appearance of the building reflects the established townscape forming part of the City Cluster which forms a significant part of the Conservation Area's Setting.
701. Officers consider that the proposed development within the conservation areas wider setting will have no adverse impacts on the setting of the Bishopsgate Conservation Area nor its significance.

Finsbury Circus Conservation Area and Finsbury Circus Registered Historic Park and Garden (II)

Significance

702. The Conservation Area is a small area comprising the registered park and garden of Finsbury Circus and its surrounding development. The laying out of Finsbury Circus was implemented in 1815-17 by George Dance's successor as City Surveyor, William Montague, although its design dated from 1775-1800. The significance of the CA is derived from its inclusion of buildings of a high architectural quality and composition, strategically situated around the formal planned development of Finsbury Circus, which is considered to be an unusual feature within the City of London. The oval shape of the gardens, built in conjunction with the original layout of the square, provides a characterful perimeter to the green open space. The mature trees and garden layout contributes to the leafy character central for the Circus. It features large 19th and 20th century commercial buildings with extensive ornamental detail and a generally uniform roofline. Buildings are of particular historic and architectural interest as impressive 19th and 20th century commercial buildings with extensive detailing, modelling, uniform height and varied rooflines. There are a number of listed buildings in the Area: London Wall (Scheduled Ancient Monument), Lutyens House (GII*), Park House and Gardens (GII), Finsbury House (GII), London Wall Buildings (GII), Salisbury House (GII), Business School, London Metropolitan University (GII), Drinking fountain and shelter, north side of gardens (GII).

Setting

703. The conservation area and the RPG is bound by London Wall to the south, Moorgate to the west, Blomfield Street to the east and South Place and Eldon

Street to the north. To the south the Conservation Area shares a boundary with the Bank Conservation Area and to the south, and New Broad Street to the east. The residential towers of the Barbican are visible to the west of the Conservation Area, with other, contemporary, taller buildings visible within its immediate setting. Owing to the imposing buildings contained within such a tightly planned space, the sense of enclosure is extensive, meaning that long vistas outwards are limited. Due to the considerable distance and extent of interposing development, there is no functional nor visual relationship with the Conservation Area, the RPG and the site.

Impact

704. The upper levels of the proposed development would infill part of an existing skyline gap when appreciated in some views moving through the Conservation Area looking south, by introducing a new building that bridges the gap in scale between that of 100 and 22 Bishopsgate. The appearance of the building in some views looking south is in keeping with the established commercial centre of the eastern cluster and does not challenge an appreciation of the formally planned landscape of Finsbury Circus and its primary significance as a Conservation Area and would add to the varied cluster of tall buildings which are clearly distinct from this historic space. This is shown in AVR View 34. There would be no harm to the setting or significance of the Conservation Area or the significance of the Registered Historic Park and Garden.

Bunhill Fields and Finsbury Square Conservation Area

Significance:

705. Bunhill Fields and Finsbury Square Conservation Area is located in the south-east corner of the London Borough of Islington, immediately north of the Moorgate entrance to the City of London. The Conservation Area comprises a small area which is centred around the burial ground of Bunhill Fields.
706. Bunhill Fields was a non-denominational burial ground on the outskirts of the City of London, which was used between 1665 and 1854. As London's population grew, the requirement of cemeteries increased. With the ceasing of burials in Bunhill Fields, London's authorities embarked on the construction of seven major new cemeteries on what was then the periphery of the city. Bunhill Fields subsequently got smaller due to development pressure as Victorian development encroached on the land. A larger number of these buildings survive of traditional construction which are interspersed with more modern post war development.
707. Finsbury Square was developed in 1777 on the site of Finsbury Fields of which none of the original terraces remain. The Square has been developed

to include large-scale buildings which include modern development such as 30 Finsbury Square and the University of Liverpool's London campus.

708. The heritage value of the CA is derived from how the area lies within the open spaces throughout the Conservation Area and how they are enclosed. There is further historic interest and associations through the Wesley Chapel and tomb of John Wesley and other positively contributing buildings of different periods.

Setting:

709. Beyond the boundaries are various other Conservation Areas including St. Luke's (LB Islington), South Shoreditch (LB Hackney), and Sun Street (LB Hackney). Each conservation area has a character distinctive to itself with variations on building style and scale.
710. Views of the City and the clusters of towers are prominent within the skyline of different vistas throughout the area. Views into the Barbican are also experienced where the buildings terminate views at the end of roads. The urban setting is varied, with contemporary, tall buildings of mixed use predominating in views out of the Conservation Area.
711. The development site, due to the separation distance and the extent of interposing development does not share a visual or functional relationship with the Conservation Area.

Impact:

712. A letter of objection has been received from Max Skjoldebrand an architect who was a former senior member of the project team at Fitzroy Robinson Partnership for the design and construction of the existing development currently at 55 Bishopsgate. Under paragraph 9 of the letter of objection states that: *The bulk and massing of the proposed 63 storey tower will have a serious impact on the important townscape views from the nearby Bank, St Helens Place, Finsbury Square and Bunfield Fields conservation areas.*
713. Islington London Borough Council have also raised concerns with the development. Stating that View 35 of the submitted Heritage, Townscape and Visual Impact Assessment shows that the proposed development would be visible from within the Grade I Listed Bunhill Fields. They consider that the proposed development would contribute to the gradual erosion of the site's significance through development within its setting. This is addressed below.

714. The proposed development will be partially visible from some parts within the Conservation Area looking southeast towards the commercial centre of the Eastern cluster. HTVIA View 35 shows the limited visual impact from Bunhill Fields itself and there will be certain points where the visibility of the building is more pronounced, as shown in HTVIA View 36 from Finsbury Square. Where the proposed development would be more visible it would be understood as part of the established Eastern cluster of tall buildings that are characteristic of the City.
715. Furthermore, in the cumulative context the City cluster will be further consolidated by new tall buildings, which would be partially visible in the backdrop. This would help to reduce its presence on the skyline further.
716. Officers consider that the proposed development would not harm the setting or significance of the Conservation Area.

Whitehall Court (II*) Westminster

717. The GLA, Historic England and Westminster City Council all object to the impact of the development on the designated heritage assets and identify a degree of harm.
718. Significance: A mansion block of flats, built in 1884 by Thomas Archer and A.Green. The north end of the block, historically occupied by the National Liberal Club was designed by Alfred Waterhouse and completed in 1887. The block is constructed of Portland Stone, in a 'vast elaborated pile with Exuberant French Renaissance, Chateau de la Loire inspired details'. The significance of the building is derived in its existence as an exceptional example of a late 19th century purpose-built block of luxury apartments, for the upper classes. Its architectural value is predominantly derived in its exterior facades, the principal of which fronts Whitehall Court Road and the picturesque roofline is best appreciated and understood from St. James's Park or in riparian views. It derives further historic interest in its associations with a number of prominent historic residents including William Gladstone, George Bernard Shaw and Lord Kitchener. During World War One the building was used by MI6.
719. Setting: The surrounding context comprises a number of highly valued listed buildings. The buildings form an ensemble of tiered roof forms with Horse Guards and the War Office/Ministry of Defence best appreciated from St James's Park. The proximity to Westminster Abbey, the Houses of Parliament and interposing government buildings reinforce the high status of

the apartment block and connections with former prominent residents. Much of the surrounding development comprises buildings dating to a similar era, which are also constructed of Portland Stone and of a similar architectural style. These positively contribute to an understanding of the building's historical placement. The building is also located within close proximity to the St James Park to the west and the River Thames and Victoria Embankment to the east. These natural elements of setting provide opportunities to appreciate the architectural significance particularly the entirety of the roofscape in an open aspect. This pastoral setting, from St James's Park over the lake within the Royal Park articulates a dramatic series of projecting bays and pavilions in Portland stone, forming the foreground of a group of classical buildings around Whitehall.

720. Impact: The impact would be similar to that as to Horse Guards and War Office/Ministry of Defence with which the building and roof scape forms an ensemble appreciated from St James's Park Bridge. The proposed new building would appear behind the historic roofline of Whitehall Court in views from St James's Park that uniquely capture London's character as a city that combines historic architecture with historic landscapes. The proposal has been designed as a complementary pinnacle architectural form – one pleasingly curvilinear in contrast to the more geometric forms of the historic ensemble. It is strategically sited, as part of a distinct consolidating City Cluster skyline form, set aside from, and subservient to, the pre-eminent Whitehall composition. The principal sky-etched silhouette of Whitehall Court would be, on the whole, preserved but the development would encroach on the clarity of the roofscape and introduce a modern form in the backdrop between the historic roofline and the existing modern tower at 22 Bishopsgate. The height and scale of the development would be a detracting feature within the setting and would compete with and slightly erode the visual clarity and silhouette of the roofscape a key element of significance.
721. This setting interaction is transient and experienced as part of the journey along the blue bridge and it is acknowledged there would be no other impacts on other elements of setting (excluding the War Office/Ministry of Defence and Horse Guards) which contribute to Whitehall Court.
722. In baseline and cumulative scenarios the proposal would harm the significance of Whitehall Court reducing by visually competing with the picturesque roof form a key architectural element of significance. The impact is evaluated at the lower end of the spectrum of less than substantial harm.

Horse Guards (I) Westminster

723. The GLA, Historic England and Westminster City Council all object to the impact of the development on the designated heritage assets and identify a degree of harm set out in the consultation section.

724. **Significance:** The building was constructed in c.1754-48 as army headquarters to the designs of William Kent and built by John Vardy and William Robinson. It is constructed of Portland Stone, in the Palladian architectural style. It replaced an earlier building, as barracks and stables for the Household Cavalry. It was, between the early to mid-18th century, the main military headquarters for the British Empire. It originally formed the entrance to the Place of Whitehall and later St James's Palace. The significance of the building is derived in its existence as an exceptional example of a mid-18th century purpose-built army headquarters in the Palladian architectural style. Its principal significance is drawn from its important contribution to historic and current Royal and State ceremonies and the Horse Guard Parade Ground. Architectural values derive from its exterior elevations and roof form including cupola lantern and octagonal clock tower which can be viewed by the Horse Guards Parade. In particular, the unique and complex roof form of the building together with that of the War Office/Ministry of Defence and Whitehall Court roofscapes can be best appreciated from its pastoral settings when viewed from the bridge over the lake within St James's Park. Horse Guards occupies a central and prominent position within Whitehall itself both as an individual building but also as part of an ensemble of high value historic buildings on the processional route to Parliament.
725. **Setting:** Positioned prominently on Whitehall the surrounding context comprises a number of highly valued listed buildings and spaces. These form an ensemble along Whitehall with Whitehall Court and the War Office/Ministry of Defence and other Government buildings. The proximity to Westminster Abbey, the Houses of Parliament and interposing government buildings reinforce the high status of the building and its important ceremonial functions. Much of the surrounding development comprises buildings dating to a similar era, which are also constructed of Portland Stone and of a similar architectural style. These positively contribute to an understanding of the building's historical placement. The building is also located within close proximity to the Grade I RPG of St James Park to the east. This naturalistic setting provides opportunities to appreciate the architectural significance particularly the entirety of the roofscape in an open aspect including the orthogonal tower and clock. In this experience Horse Guards is backdropped by War Office/Ministry of Defence and Whitehall Court and collectively these form an elaborate cascade of unique spires and pinnacles. This pastoral setting, from St James's Park over the lake within the Royal Park articulates a dramatic series of projecting bays and pavilions in Portland stone, forming the foreground of a group of classical buildings around Whitehall including Horse Guards.
726. **Impact:** The impact would be similar to that as to Whitehall Court and Old War Office with which the building and roofscapes which forms an intricate ensemble appreciated from St James's Park Bridge. The proposed new

building would appear behind the historic roofline of Whitehall Court and within the setting of Horse Guards in views from St James's Park that uniquely capture London's character as a city that combines historic architecture with historic landscapes. The proposal has been designed as a complementary pinnacle architectural form – one pleasingly curvilinear in contrast to the more geometric forms of the historic ensemble. It is strategically sited, as part of a distinct consolidating City Cluster skyline form, set aside from, and subservient to, the pre-eminent Whitehall composition. The principal sky-etched silhouette of Whitehall Court and the ensemble of roof forms which contribute to an understanding of significance would be, on the whole, preserved but the development would encroach on the clarity of the roofscapes and introduce a modern form in the backdrop of the setting between the historic rooflines and the existing modern tower at 22 Bishopsgate. The height and scale of the development would be a detracting feature within the setting and would compete with and slightly erode the visual clarity and silhouette of the series of roofscapes which contribute to the architectural significance and appreciation of Horse Guards.

727. This setting interaction is transient and experienced as part of the journey along the blue bridge and it is acknowledged there would be no other impacts on other elements of setting (excluding the War Office/Ministry of Defence and Whitehall Court) which contribute to Horse Guards including importantly Horse Guards Parade Ground.
728. In baseline and cumulative scenarios the proposal would harm the significance of Horse Guards by visually competing with the picturesque roof form a key architectural elements of significance. The impact is evaluated at the lower end of the spectrum of less than substantial harm.

War Office/Ministry of Defence (Grade II*) Westminster:

729. The GLA, Historic England and Westminster City Council all object to the impact of the development on the designated heritage assets and identify a degree of harm set out in the consultation section.

Significance:

730. A Government office completed 1907 and designed by William Young which possess considerable architectural and historic values. Its significance derives from its monumental English Baroque references, distinguished by the bowed corner pavilions surmounted by Baroque cupolas which disguise the irregular plan of the deep island site; the cupolas an essential part of the Whitehall roofscape, in particular when viewed from St. James's Park. Historic significance is derived from its associations with Britain's former imperialism as the main base for British Military operations. Former occupiers include

Kitchener, Churchill, Lloyd George and Profumo. The building is currently being converted into a high residential use.

731. Setting: Positioned between Whitehall and Horse Guards Parade the surrounding context comprises a number of highly valued listed buildings and spaces. These form an ensemble along Whitehall with Whitehall Court, Horse Guards, Banqueting House and other Government Offices. The proximity to Westminster Abbey, the Houses of Parliament and interposing government buildings reinforce the high status of the building and its former functions. Much of the surrounding development comprises buildings dating to a similar era, which are also constructed of Portland Stone and of a similar architectural style. These positively contribute to an understanding of the building's historical placement. The building is also located within close proximity to the Grade I RPG of St James to the east. This naturalistic setting provides opportunities to appreciate the architectural significance particularly the entirety of the roofscape in an open aspect including the defining cupolas. In this experienced position between Whitehall Court and Horse Guards collectively this unique grouping forms an elaborate cascade of unique spires and pinnacles. This pastoral setting, from St James's Park over the lake within the Royal Park articulates a dramatic series of projecting bays and pavilions in Portland stone, forming the foreground of a group of classical buildings around Whitehall.

Impact:

732. The impact would be similar to that as to Whitehall Court and Horse Guards between which the War Office/Ministry of Defence is positioned and with which the building and roofscape forms an intricate ensemble appreciated from St James's Park Bridge. The proposed new building would appear behind the historic roofline of Whitehall Court and within the setting of War Office/Ministry of Defence in views from St James's Park that uniquely capture London's character as a city that combines historic architecture with historic landscapes. The proposal has been designed as a complementary pinnacle architectural form – one pleasingly curvilinear in contrast to the more geometric forms of the historic ensemble. It is strategically sited, as part of a distinct consolidating City Cluster skyline form, set aside from, and subservient to, the pre-eminent Whitehall composition. The principal sky-etched silhouette of Whitehall Court and War Office/Ministry of Defence and the ensemble of roof forms which contribute to an understanding of significance would be, on the whole, preserved but the development would encroach on the clarity of the roofscapes and introduce a modern form in the backdrop of the setting between the historic rooflines and the existing modern tower at 22 Bishopsgate. The height and scale of the development would be a detracting feature within the setting of the War Office/Ministry of Defence and would compete with and slightly erode the visual clarity and silhouette of the

series of roofscapes which form the setting and contribute to the architectural significance and appreciation of the War Office/ Ministry of Defence.

733. This setting interaction is transient and experienced as part of the journey along the blue bridge. It is acknowledged there would be no other impacts on other elements of setting (excluding the Horse Guards and Whitehall Court) which contribute to the significance of the War Office/Ministry of Defence.

734. In baseline and cumulative scenarios the proposal would harm the significance of War Office/Ministry of Defence by visually competing with the picturesque roof forms a key architectural element of significance. The impact is evaluated at the lower end of the spectrum of less than substantial harm.

Ministry of Defence (I) Westminster

735. The GLA, object to the impact of the development on the designated heritage assets and identify a degree of harm.

Significance:

736. The Ministry of Defence a Portland stone Edwardian building with neo-classical details and copper clad roof was designed in 1913 by Vincent Harris, but only built after World War II, completed in 1959. It was built on part of the former site of the Palace of Whitehall. The Ministry of Defence possesses historic and architectural interest as a well-preserved example of an early 20th century institutional building, purpose built as the headquarters of Britain's Ministry of Defence. It also derives additional historic and architectural interest for incorporating 16th century vaulted undercroft and 18th century historic rooms reconstructed into the interior.

Setting:

737. The buildings draws significance from its Whitehall location the surrounding context comprises a number of highly valued listed buildings and spaces. The proximity to Westminster Abbey, the Houses of Parliament and interposing government buildings reinforce the high status of the building and its former functions. Much of the surrounding development comprises buildings dating to a similar era, which are also constructed of Portland Stone and of a similar architectural style. The landscape setting to the east and west and river frontage as well as the glimpse of the copper roof from St James's Park between trees emphasise the status and important function of the Headquarters. These elements positively contribute to an understanding of the building's historical placement and former functions.

Impact :

738. The proposed development would appear within the setting and interact with the roofline above the Ministry of Defence from St James's Park but the visual impact would be limited and for a short section of the transient experience across the blue bridge and would also be seen in the context of a backdrop which is already altered by the presence of 22 Bishopsgate. Where the proposal is visible it has been designed as a complementary pinnacle architectural form – one pleasingly curvilinear in contrast to the more geometric forms of the historic ensemble. It is strategically sited, as part of a distinct consolidating City Cluster skyline form, set aside from, and subservient to, the pre-eminent Whitehall composition of Horse Guards, War Office/Ministry of Defence and Whitehall Court also within the setting. Given the limited visibility of the Ministry of Defence from St James's Park due to the trees together with the presence of 22 Bishopsgate any impact to significance of the designated heritage asset is considered to be neutral.
739. The proposed development would have a neutral impact and would not harm the setting of the listed building or affect the ability to appreciate its significance as a designated heritage asset or impact on other elements of setting which positively contribute to significance.

St James Park (RPG grade I)

740. Significance: The heritage value of the Royal Park is of high significance, and it is at the historic heart of the nation. Its origins as a Royal hunting ground on the edge of London, and subsequently a Royal Park are still recognisable in its verdant and pastoral character. The inner park survives today substantially to the picturesque manner of John Nash, with its naturalistic lake and islands, informal plantations and shrubberies. The Park is culturally significant in terms of its location, neighbours, and national ceremonial routes. They are both heavily used by visitors from all over the world due to their proximity to Buckingham Palace, Whitehall, Downing Street and Trafalgar Square. The Park continually hosts significant State, Ceremonial and National events.
741. Setting: The setting of the Royal Park has undergone substantial change throughout the years. However, the ability to appreciate the significance of the Park is not diminished by the ongoing contextual development of London. The setting is varied bound by major roads The Mall to the north, Birdcage Walk to the south and numerous and the historic rooflines of 18th and 19th century buildings to the east principally Horse Guards, War Office/Ministry of Defence and Whitehall Court create a unique urban contribution to the significance of the landscape. Historic architecture and landscape complement each other to form a highly significant place.
742. Impact: The proposed new building would appear behind the historic roofline of the Whitehall Buildings ensemble (Whitehall Court, War Office/Ministry of Defence and Horse Guards) in iconic views from St James's Park that

uniquely capture London's character as a city that combines historic architecture with historic landscapes. The proposal has been designed as a complementary pinnacle architectural form – one pleasingly curvilinear in contrast to the more geometric forms of the historic ensemble. It is strategically sited, as part of a distinct consolidating City Cluster skyline form, set aside from, and subservient to, the pre-eminent Whitehall composition. The principal sky-etched silhouette of Whitehall Court and the ensemble of roof forms which contribute to an understanding of significance of the Royal Park would be, on the whole, preserved but the development would encroach on the clarity of the roofscapes and introduce a modern form in the backdrop of the setting between the historic rooflines and the existing modern tower at 22 Bishopsgate. The height and scale of the development would be a detracting feature within the setting distracting from the picturesque setting and erode the groups contribute to understanding and appreciation of significance of St James's Park. The harm identified above would be somewhat lower when applied to the significance of the Grade I registered St. James's Park as a whole, given the size of the historic landscape and the relatively isolated impact upon it.

Attaching great weight to the iconic heritage status and significance the harm is considered at very much the lower end of the spectrum of less than substantial harm.

Non-Designated Heritage Assets

743. 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.

Liverpool Street Arcade :

Significance:

744. Remains of the original Metropolitan Line Station, including the (much altered) post-electrification Edwardian Metropolitan Arcade, executed in a well-detailed French pavilion classical manner, drawing much significance from setting, namely at the heart of a major Victorian railway ensemble at Liverpool Street with a strong group value with Liverpool Street Station (GII) (inc 50 Liverpool Street, Hope Square and the 'Neo-Victorian' towers) and the former GEH (GII*). It is considered to be of a high level of local significance for its architectural and historic value, and considered a non-designated heritage asset.

Setting:

745. The arcade draws much significance from setting, namely at the heart of a major Victorian railway ensemble at Liverpool Street with a strong group value

with Liverpool Street Station (GII) (inc 50 Liverpool Street, Hope Square and the 'Neo-Victorian' towers) and the former GEH (GII*).

Impact:

746. There would be some intervisibility with the arcade in AVR 34 at Liverpool Street looking south along Old Broad Street. The Non Designated Heritage Asset is part of the mid ground of low scale late 19th historic townscape. This is articulated by varied and interesting roof profile and architectural features of note including the stucco treatment and round arched/ circular windows. The upper elements of the proposed development would appear behind the existing tall building context. Full views of the proposals remain obscured by interposing development in the form of 100 Bishopsgate. Partial glimpses of the buildings' mid to lower elements are seen appearing in between 100 Bishopsgate and Tower 42. The proposal would integrate into the existing tall building cluster and introduce a new datum height within the view, protruding into the skyline above the existing tall buildings within the frame. This increased scale is mitigated by a number of design features, including the upward tapering effect which reduces the perception of mass. The proposals would have the benefit of drawing Tower 42 into the cluster and create a more harmonious skyline and signpost the location of the city cluster at an important transportation interchange. In baseline and cumulative scenarios, the proposal would be distinct from the more historic low scale townscape.
747. The proposed development would not harm the setting or significance of the non-designated heritage asset.

55 Bishopsgate:

748. The existing building is not identified as a non-designated heritage asset. The applicants have applied for a Certificate of Immunity in June 2023.
749. There are a number of objections to the loss of the existing building and the Twentieth Century Society have suggested the building should be identified as a Non-designated heritage asset.
750. The potential architectural and historic values of the existing buildings have been assessed against the Historic England criteria for selecting non-designated heritage assets contained in 'Local Listing: Identifying and Conserving Local Heritage Advice Note 7'. The assessment is summarised below.
751. Asset and rarity: 55 Bishopsgate is one of many commercial buildings built in the 1980s as part of the boom in the financial services industry. Locally it is not rare as a development of the City as London's financial hub has meant

that a significant number of commercial buildings still exist from this period. The building's architects, Fitzroy Robinson and Partners, designed a number of buildings within the City of London elsewhere in London and further afield across the United Kingdom and it is not a stand out example of their work.

752. Age: 55 Bishopsgate was built in 1988-91 to designs by Fitzroy Robinson for Kumagai Gumi. Founded in 1956 by Herbert Fitzroy Robinson, the practice helped to shape the built environment of the City of London in the post-war period.
753. Architectural and artistic : The 5 storey building is clad in muted pre-fabricated materials. It is considered to be a neutral element within the setting of the listed buildings opposite the site at 52 to 68 Bishopsgate (Grade II) and St Ethelburga's Church (Grade I). 55 Bishopsgate does not possess significant architectural interest in terms of its quality of design, elevational treatment or application of materials. It is well mannered and neighbourly but is considered background architecture which makes little contribution to ground floor level and does not stand apart from other large-scale commercial developments of the period as being of particular architectural quality.
754. The exterior façade comprises prefabricated components which are not unique to 55 Bishopsgate and are an architectural technique that is commonly used. An interior inspection of the building was carried out in February 2023. The fixtures and fittings in each individual office space have been altered by occupiers since its construction.
755. Group value: 55 Bishopsgate is sited between Tower 42 and the 99 Bishopsgate tower, the forms of which contrast with the mid-scale form of 55 Bishopsgate. Opposite the Building are several listed buildings dating to the 18th/19th centuries, as well as the 13th century Grade I listed Church of St Ethelburga. 55 Bishopsgate does not therefore exhibit group value. It is experienced as a one-off, speculative commercial development on the thoroughfare of Bishopsgate.
756. The building is part of the 1990s piecemeal redevelopment of the CoL commercial district. Historic England's own assessment of the building concludes it does not possess particular interest or features which distinguish it from similar commercial developments of the time.
757. Archaeological interest: The building does not possess significant archaeological interest.

758. Historic interest: The building has no historic interest. There are no grounds to assign interest to the building relating to important aspects of history, or close associations with nationally important persons or events. Little of note has happened within the Building, and whilst it was damaged in the IRA bombing of 1993, it was one of many in the Bishopsgate area affected by this event, and individually its association with this event is not of significance.
759. Landmark status: The building is not distinguished in architectural and townscape terms and that it makes a neutral background contribution to the street scene.

Conclusion:

760. Overall, the development would not harm identified non designated heritage assets and 55 Bishopsgate has limited architectural and historic values and does not meet the criteria to warrant non-designated heritage asset status. The existing 20th century building on Site makes a neutral, contribution to local townscape. The proposals comply with local plan policy CS12.

Other Heritage Assets

761. Setting of a heritage asset 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 Table 6.1 includes a list of heritage assets which were scoped in and out. The designated heritage assets considered included but not exclusively so :
- Custom House, Grade I
 - Old Billingsgate, Grade I
 - Finsbury CA
 - Bevis Marks Synagogue (Grade I)
 - Bank of England (Grade I)
 - Church of St Margaret (Grade I)
 - Tower and Remains of Church of All Hallows Staining (Grade I)
 - Church of St Mary Woolnoth (Grade I)
 - Church of St Botolph Aldgate (Grade I)
 - Church of All Hallows (Grade I)
 - Church of St Andrew Undershaft (Grade I)
 - Church of St Peter Cornhill (Grade I)
 - Church of St Michael (Grade I)

- Lloyds Buildings (Grade I)
- Church of St Katherine Cree (Grade I)
- Church of St Edmund (Grade I)
- Tower and remains of Church of All Hallows Staining (Grade I)
- Mansion House (Grade I)
- Drapers Hall (Grade II *)
- Carpenters Hall (Grade II*)
- Lutyens House (II*)
- Sun Street CA
- Merchant Taylor's Hall (Grade II*)
- 13-17 Old Broad Street (Grade II)
- 18 Old Broad Street (Grade II)
- Wentworth Street CA
- 23, 24 and 25, Great Winchester Street (Grade II)
- The Dutch Church (Grade II*)
- 123 Old Broad Street (Grade II)
- 26 Throgmorton Street (Grade II)
- 13-17, and 18, Old Broad Street (Grade II)
- Royal Bank of Scotland (Grade II)
- 32, 34, 41, and 43-47, Threadneedle Street (Grade II)
- 1 Old Broad Street (Grade II)
- Royal Exchange (Grade I)
- 7 Lothbury (Grade I)
- Hyde Park (RPG)
- Adelaide House (Grade II*)

762. 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:

763. Overall the following impacts have been identified and evaluated:
- Low levels of less than substantial harm have been found to the significance of Whitehall Court (grade II*), War Office/ Ministry of Defence (grade II*), and Horse guards (grade I);
 - A significant, but lower level of less than substantial harm has been identified to the significance of St Pauls Cathedral (grade I)
 - Low level of less than substantial harm has been found to the setting and significance of 52-68 Bishopsgate (Grade II);
 - Slight levels of less than substantial harm (very much lower end of the spectrum) have been found to the significance of St Helen's Place Conservation Area and St James's Park (RPG);
 - Otherwise, the significance and contribution of setting of a broad range of designated heritage assets would be preserved.
764. The scheme is design-led and has accounted for strategic heritage considerations, having been designed to accentuate the unique characteristics and spirit of the City of London. It has also been found that the proposal would result in minor enhancement of a number of panoramic strategic views and local views of neighbouring boroughs.
765. Overall, the proposal would draw conflict with Local Plan Policies CS12, DM 12.1, 12.5, CS13 (1 and 2) draft City Plan policies S11 and, HE1 London Plan HC1, and with the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies.
766. 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

767. The site lies in an area of archaeological interest identified in the Local Plan. An Environmental Statement which includes a Technical Appendix for Archaeology prepared by MOLA has been submitted with the application.
768. The report indicates that the site is located in an area of high archaeological potential and that previous archaeological work was carried out on the site prior to the construction of the current buildings in the 1980s. Archaeological remains identified on the site included features from the prehistoric and Roman periods. Little material from the medieval and post-medieval periods had survived on the site due to later truncation.
769. The proposed development included a lower ground floor, basement level 1 and basement level 2. It is clear from the desk-based work that the two basement levels will have completely truncated all archaeological material. The construction of the lower ground floor will also have removed the majority of archaeological remains, however a limited potential for survival of deeper cut features such as pits or wells remains.
770. The proposals are acceptable subject to conditions to monitor geotechnical investigations to clarify the nature and extent of surviving remains followed by, if necessary further investigation works and these aspects would be secured by planning condition and informatives.

Public Access and Inclusivity

771. 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.
772. The principles of inclusive design have been incorporated into the proposals and the scheme is design to be highly accessible, with accessibility being considered for all levels of the building for both visitors and office workers.
773. The ground floor of the building is a publicly accessible open space with no enclosure, providing a flexible public realm area under the building. The flexible space provides pedestrian permeability across the entire site previously closed off to public access.
774. There are lifts down to the Conservatory entrance hall and up to the public amenities at levels 02 and 03. For access to the Conservatory there is a transfer level provided at Level 58 with scenic circular lifts and staircase from Level 58 to Level 59. These provide a transfer back to main internal core. There is a central scenic lift, and feature staircase from Level 61 to Level 64

which is the top of the viewing platform. The scenic lift will exceed Part M requirements and be larger than minimum size to accommodate a wide range of users.

775. The Fire Statement explains in detail the evacuation procedures and the strategy has adopted best practice procedures for the evacuation of disabled people from all parts of the building.
776. Toilet facilities at the Ground Floor provides a unisex accessible toilet and a separate accessible baby changing facility. The Lower Ground floor provides a Changing Places facility for adults with complex and multiple disabilities; two unisex accessible toilets; and a toilet for ambulant disabled people. At the Conservatory, Level 61 there are two unisex accessible toilets; and a unisex toilet for ambulant disabled people. The provision of toilet facilities would be generous and consistent with best practice.
777. In addition to the measures outlined above the following key design principles have been followed:
- a) All floorspace is level access and lift access is provided to all floors;
 - b) Level changes are mediated across the ground floor to allow level access throughout at acceptable gradients;
 - c) Surface treatments, lighting and design features will all be developed with access in mind;
 - d) A compliant provision of accessible cycle parking spaces is incorporated into the scheme; and
 - e) All entry points to restricted areas will have accessible gates.
778. 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

779. Local Plan policies CS11 and DM11.2 and draft City Plan 2036 Strategic Policy S6 encourage new cultural experiences and art works. A Social Value, Culture and Community Plan and Cultural Plan has been submitted in accordance with draft City Plan 2036 Strategic Policy S6.
780. A Social Value, Culture & Community Plan and a further Cultural Plan has been prepared by Hatch which describes the approach that the applicant is taking to maximise the additional social value, cultural and community benefits from the proposal.

781. The proposal includes a publicly accessible multipurpose space on the ground floor, part level 02 and part level 03 for flexible uses which include retail, food and beverage, drinking establishment, learning, local community, co-working, events and exhibition spaces, a publicly accessible multi-purpose upper-level amenity space, new and improved public realm, hard and soft landscaping, provision of cycle parking and vehicle lifts, means of access and associated infrastructure servicing facilities.
782. The proposal seeks to create a mixed-use commercial workspace with a civic destination for Bishopsgate. The cultural vision aims to deliver a visitor destination, a dynamic exhibition space, and a specialist education and professional networking hub, as well as space for innovation, collaboration and learning. The proposals will comprise several linked, flexible public spaces accessible to visitors, residents and workers.
783. Furthermore, the conservatory and viewing gallery would further enhance this offer and act as a vibrant and contemporary public destination for the City of London and wider London.
784. In collaboration with the NLA, a potential partner, operator and long-term partnership, a worked example of how these flexible public spaces could be used to deliver a distinctive cultural offer at this site. The space at this site could potentially provide a permanent home for the London Centre, a dedicated hub for the built environment which would utilise the lower public floors and top-level public viewing gallery and conservatory space.
785. The selected cultural partner will act as the main operator of the various components of the cultural offer, including the exhibition, auditorium and co-working spaces. The operator would be responsible for managing the lower-level spaces including the curation of exhibitions, scheduling of events and working closely with partners and suppliers to ensure the offer is cohesive and holistic and to ensure that the programme aligns with the aspirations of the Destination City and EC BID.
786. 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.
787. The policies referred to above are complied with.

Highways

Public Transport

788. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B. Liverpool Street Station is located approximately 500m to the north of the site, Fenchurch Street Station approximately 780m to the east of the site, Moorgate Station approximately 740m to the northwest of the site and London Cannon Street Station approximately 820m to the south of the site. These stations are served by the Overground, Stansted Express, TfL Rail, C2C, Greater Anglia, Great Northern and South-eastern.

Trip generation

789. Within the Transport Assessment a trip generation forecast has been conducted for the site which identifies the change in trips (office and visitors) that would result from the proposed development.
790. The trip generation data for the site is expected to be 1,885 at PM Peak and 2,037 at AM Peak.
791. The existing flows along Bishopsgate in the AM Peak Hour are 2,500 trips per/hour and in the PM Peak hour are 2,900 trips per/hour, based on 2015 data. The survey year was selected because of the pandemic, which has affected the pedestrian flows in 2021.
792. The methodology applied, was used in previous approved sites, such as 22 Bishopsgate, 1 Undershaft and 100 Leadenhall Street.
793. The trips associated with the retail element of the proposed development, are likely to be trips made by the occupiers of the development and visitors. This has been taken into consideration in the Transport Assessment reports.
794. It is believed that there will be a considerable amount of new trips to the area, due to the introduction of the office development, the viewing gallery and the public space. Improvements/contributions to the highways network will be secured from the developer (via the S106 Agreement and S278 Agreement), to improve the pedestrian environment in the vicinity of the site.
795. Prior to the commencement of the S278 design works, the applicant is required to provide trip generation associated with the nearby developments which have been granted planning consent to ensure the highway works meet the requirements at the time of their delivery.

Pedestrian comfort Levels (PCLs)

796. 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) in the vicinity of the site on Bishopsgate would have a minimum of B-

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+.

797. The site frontage on Bishopsgate has an existing PCL between C and B-. In the proposed scenario the PCLs would improve to between B- and A- along the site frontage which is considered acceptable. It is likely that the increase in pedestrian and cycle movements generated by the site would require mitigation works to be carried out beyond the site frontages, to widen the footways in order to further improve pedestrian flows, where it is possible to do so. These measures would be secured by the S278 agreement.
798. TfL have undertaken a temporary traffic scheme on Bishopsgate, the Bishopsgate Corridor Scheme, which was initiated by TfL in 2020 and included temporary pavement widening. The results of these interventions are still being considered by TfL and a decision is to be made following consultation whether these interventions are made permanent or not. The applicants PCL assessments have accounted for a scenario where the pavement widening would not be implemented, and the assessments demonstrate that the existing kerb line provides sufficient pavement width for an acceptable PCL, this demonstrates there would be an improvement in pedestrian comfort along the site frontage. Assessments as part of the s278 agreement and s106 obligations will explore opportunities to raise the pedestrian comfort level beyond an acceptable level, where possible, including beyond the site frontage, if required.
799. The transport assessment includes indicative pavement widening drawings, which are acceptable to TfL in principle, although the detail of any pavement widening or transport mitigation works will be assessed in more detail following the outcome of the consultation on the Bishopsgate Corridor Scheme and as part of the s278 agreement and s106 obligations. Prior to entering into a s278 agreement with TfL, the developer is required to undertake a further PCL assessment, secured through the s106, to include the pavement extent following the outcome of TfL's consultation and a PCL assessment of pavements and junction beyond the site boundary, to ensure that pedestrian comfort levels are maintained to an acceptable level, or are enhanced, and to ensure that any necessary mitigation works are secured through the s278 agreement.
800. Where necessary, works to widen pavements and improve pedestrian crossings will be secured through a S278 agreement and s106 obligations and financial contributions with TfL.

Cycle parking

801. 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.

802. 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
1,293	1,435	116	122

803. The long stay cycle parking for all uses is proposed at lower ground floor and Basement B1 levels with access available via two cycle lifts and a staircase with wheeling ramps. The lifts provided would be sufficient in size to accommodate all types of cycle and would have the capacity to accommodate more than one cycle. The proposals include 30 vertical stands, 398 two tier stands, 61 folding bike lockers, 7 accessible stands and 11 Sheffield stands. 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 will be secured by condition.

804. The short stay cycle parking spaces would be located at ground and lower ground level. Eight Sheffield stands and four cargo bike stands would be provided at ground level adjacent to the cycle lifts. 102 spaces would be provided at lower ground level consisting of 17 vertical stands, three Sheffield stands, 14 two tier stands, 15 folding bike lockers and 6 accessible stands. Base Sheffield stands (10 spaces) will be provided within the site at ground floor level.

805. 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 which will be required to address both the long stay spaces and also ensuring public access to the short stay spaces. It will need to be submitted to the City for approval in line with the London Plan Policy T4.

Servicing and Deliveries

806. 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.
807. The proposals seek to provide a new on-site servicing area at basement level which would be accessed via two lifts set within the new pedestrian walkway. Vehicles would be able to turn within the basement in order to access and egress from the site in a forward gear, in accordance with DM16.5. The style of vehicle lifts proposed have previously been accepted on other sites in the City, although none of these developments are yet completed. Movements into and out of the lifts would be managed by a banksman, and the management of the lifts would be secured through the Delivery and Servicing Plan. Details of the maintenance of the vehicle lifts would be secured through the S.106 agreement.
808. A new vehicular access point would be required on Bishopsgate to accommodate vehicular access. TFL have not objected to this proposal but have requested that a stage 1 vehicle safety audit be undertaken and this would need to be agreed with TFL as part of the wider S278 agreement.
809. 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 136 delivery vehicles. This is considered to be low when assessed against the City's ready reckoner planning tool. 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.
810. 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 22:00 – 07:00 on Monday, Tuesday, Wednesday, Thursday, Friday and Saturday evenings, and between 21:00 – 07:00 on Sunday 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.
811. The development will be required to produce a delivery and servicing plan (DSP), and this would be secured by Section 106 obligation.

812. Overall, it is not considered that the proposed servicing arrangements would result in any undue implication on the public highway, nor highway safety in general and are considered acceptable.

Refuse management

813. 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.
814. The service yard is accessible via lifts which has four loading bays, as well as the waste storage, including a compactor.
815. The service yard and loading bays have been designed in collaboration with the City of London Waste facilities manager to accommodate an 8m rigid vehicle, a City of London vehicle and a City of London skip vehicle to remove the compactor waste.
816. 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

817. 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.
818. 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.
819. 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 general parking is provided.'
820. The site currently has 17 off-street parking spaces within the existing basement.

821. The applicant is proposed a car free development except for 2 Blue Badge spaces. This is acceptable.

Oversailing

822. To date it has not been identified the requirements for an oversail licence. TFL has not raised any concerns.

Section 278/106 Agreement (TFL)

823. All the works on the public highways are to be approved (following a design review with the CoL) by TFL, as the Highway Authority. The scope and execution of the works are to be agreed with TFL. The highways will include, but are not limited to, the reconstruction of the footways and the re-paving of the site frontage in Yorkstone, in addition, the s278 would also analyse and consider widening the footways, improving crossing arrangements and public realm enhancements to accommodate the increase in pedestrian and cycle movement. It may also include the potential relocation of the pedestrian crossing and the bus stop if deemed necessary by TfL.

Construction Logistics Plan

824. 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 and TfL to minimise the disruption to neighbouring occupiers and other highway users. TFL has raised the need of a temporary highways scheme (to be secured under a Section 278 Agreement and prior to the permanent works)

825. The London Borough of Islington have commented that as City Road (within Islington) is proposed as a construction route any footways or highways within Islington damaged during demolition and construction should be repaired at the cost of the developer. It is considered that this request would not satisfy the tests set out in the CIL regulation and would could not be enforced by the City.

Transportation Conclusion

826. 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. As such, the proposals are considered acceptable in transport terms.

Environmental Impact of Proposals on Surrounding Area

827. 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

828. 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.
829. 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.
830. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
831. 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.
832. Assessments have been carried out for both the windiest season and the summer season.
833. 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

834. The City of London is characterised in part by a collection of tall commercial buildings of differing geometries and shapes. Tall buildings naturally create an obstruction to the strong upper-level winds and can increase the windiness in their surroundings. The magnitude of this impact depends on the design of a proposed scheme, in particular its size, shape, orientation and architectural features. The Proposed Development, the design has been optimized through extensive wind studies conducted over several years to fundamentally minimise its impacts on the wind environment in the area.
835. The existing area around 22 Bishopsgate features existing exceedances of the Lawson safety limit, it is believed that so far no safety issues have been reported in respect of the existing area, even though 22 Bishopsgate and nearby towers have been in place for several years. Lawson defines the safety limit as a once-a-year exceedance of 15m/s mean wind speed. This safety limit captures the effects of rare but very strong storm-fronts that periodically impact the UK, and attempts to identify areas where vulnerable pedestrians (e.g. elderly) would start to feel unsafe
836. To the north there is an area at the existing junction of Bishopsgate and Camomile Street which is of concern, where the prevailing winds accelerate in the area between 100 Bishopsgate and Heron Tower. With existing conditions that are marginally below the safety limit, this area currently poses a risk for cyclists travelling in the east-west direction along Camomile Street, due to sudden cross-winds experienced.
837. With the Proposed Development in place, this sudden impact on cyclists is replaced by a more uniform westerly winds along Wormwood Street and Camomile Street. While parts of Wormwood Street experience slightly windier walking level conditions, the net impact of the Proposed Development on cyclist safety is considered to be beneficial in this area.
838. Along Bishopsgate the wind conditions are largely comparable to those observed in the existing condition. The open base of the tower helps reduce windiness in this area by allowing the prevailing winds to expand as they are deflected northwards along Bishopsgate by the tall buildings.
839. The following wind mitigation measures have been identified in the cumulative scenario:
- a) Infill of soffit, on the southern side of 42-44 Bishopsgate which would be:
Approximately 70% porous; 3m tall; and 12m wide.

840. The Environmental Statement wind microclimate assessment finds that the Proposed Development including the above wind mitigation measures and existing surrounding buildings would result in a mix of Negligible, Moderate, and Major Adverse effects compared to the existing situation.
841. Overall, with the inclusion of the Proposed Development and wind mitigation measures, there are safety exceedances at the same two locations in Great St Helens as those observed for the existing condition, plus one additional location that is marginally above the safety limit (15.2 m/s, as opposed to the limit of 15.0 m/s).
842. Several design features, including the tapered shape of the tower, rounded corners, open base, and other more detailed aspects of the design help create such a minimal impact on windiness in Great St Helens.
843. Overall, the wind microclimate impact of the Proposed Development with proposed mitigation is considered to be acceptable. The Proposed Development has taken measures to mitigate any significant wind effects and appropriately address the existing local wind conditions.
844. 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.
845. It is considered that the microclimate in and around the site, with regard to wind conditions, would on balance be acceptable in accordance with 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

846. 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.
847. 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.
848. 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.

849. 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.
850. 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

851. 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

852. 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

853. 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.
854. The residential buildings to be considered are those at:
- 1-24 Wormwood Street
 - 25 Wormwood Street
 - 26 Wormwood Street
 - 33 Great St Helens
 - 50 Bishopsgate
 - 2 Heneage Lane
 - Merchant Taylor's Hall
 - Drapers Hall
855. The religious receptors to be considered are those at:
- 4 Heneage Lane Spanish and Portuguese Synagogue
 - St Botolph Church
 - St Helens Church Bishopsgate
 - 78 Bishopsgate (St Ethelburga's Centre)
 - 7 Austin Friars
856. 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.

857. 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 inevitably result in a diminution of daylight and sunlight to surrounding commercial premises, it 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

858. 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.
859. 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).

860. 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 when considering any reductions in daylight and sunlight assessed under the BRE methodology.
861. The following scenarios have been assessed:
- Existing baseline
 - Completed proposed development
 - Cumulative Tier 1 (consented schemes with the potential to generate additional effects in conjunction with the Proposed Development); and
 - Cumulative Tier 2 (consented schemes + submitted schemes with the potential to generate additional effects in conjunction with the Proposed Development).

Cumulative Tier 1:

862. The consented cumulative schemes which required consideration in relation to daylight and sunlight due to their close proximity the site and sensitive receptors are:
- 1 Undershaft (16/00075/FULEIA);
 - Bevis Marks House (17/00330/FULMAJ); and
 - 100, 106 & 107 Leadenhall Street (18/00152/FULEIA)
863. All other cumulative schemes were considered too far from the Proposed Development to cause cumulative daylight and sunlight effects.
864. For overshadowing, a wider study area was considered and therefore, in addition to the three schemes listed above the following additional cumulative schemes were assessed:
- Leadenhall Court (18/00740/FULEIA);
 - 1-14 Liverpool Street and 11-12 Blomfield Street (19/00466/FULEIA);
 - 40 Leadenhall Street (13/01004/FULEIA); and
 - 1 & 2 Broadgate (18/01065/FULEIA)
865. All other cumulative schemes were considered too far from the Proposed Development to cause cumulative overshadowing effects.

Cumulative Tier 2:

866. For daylight and sunlight, there are no submitted schemes with the potential to be generate cumulative effects beyond the Tier 1 schemes and therefore a separate Tier 2 assessment was not required
867. For overshadowing, in addition to the consented schemes listed above, the following submitted schemes have been considered in the Tier 2 assessment:
- 33 Creechurch Lane (18/00305/FULMAJ), albeit this has subsequently been withdrawn; and
 - Site At 26-38 Leman Street And 39-47 Alie Street (Tower Hamlets) (PA/16/01460/NC)
868. A total of 14 buildings have been considered as sensitive receptors and assessed in the baseline condition in relation to daylight and sunlight. Within these 14 buildings, a total of 320 windows serving 114 rooms have been assessed. These 14 buildings are:
- 1-24 Wormwood Street
 - 25 Wormwood Street,
 - 26 Wormwood Street,
 - 33 Great St Helens
 - 50 Bishopsgate
 - Merchant Taylor's Hall B2,
 - Merchant Taylor's Hall B1,
 - Drapers Hall,
 - 2 Heneage Lane,
 - 4 Heneage Lane Spanish and Portuguese Synagogue,
 - St Botolph Church
 - St Helens Church
 - 78 Bishopsgate
 - 7 Austin Friars
869. In the baseline condition, of the 320 windows assessed for VSC, none would meet BRE's target of 27% VSC. Of the 114 rooms assessed for NSL, 19 (16.7%) would receive 80% NSL.
870. Of the buildings assessed, in the proposed scenario 25 Wormwood Street, 26 Wormwood Street, Merchant Taylor's Hall B2, Merchant Taylor's Hall B1, Drapers Hall, 2 Heneage Lane, 4 Heneage Lane Spanish and Portuguese Synagogue, St Botolph Church and 7 Austin Friars were assessed as experiencing a negligible effect within the BRE Guidelines.
871. In the cumulative (tier 1) scenario 26 Wormwood Street, 50 Bishopsgate, Merchant Taylor's Hall B2, Merchant Taylor's Hall B1, Drapers Hall, St Botolph Church and Austin Friars would not experience any greater impact.

1-24 Wormwood St

872. This residential building is located north of the site. A total of 118 windows serving 39 rooms were assessed for daylight within this building.

Proposed development:

873. For VSC, all windows assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

874. For NSL, 38 of the 39 (97.4%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The affected room would experience an alteration in NSL between 30-39.9% which is considered a Moderate Adverse effect. This room is at first storey and has low existing NSL values and therefore the alteration is unlikely to be noticeable.

875. Overall, given the existing low NSL value for one room, the percentage reduction appears as a disproportionate change, with all other windows and rooms not being affected beyond BRE's criteria, the effect is considered Negligible (not significant).

Cumulative:

876. For VSC, 111 of the 118 (94.1%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. Of the seven affected windows, all would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect.

877. For NSL, seven of the 39 (17.9%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. Of the 32 affected rooms, 12 would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect and 12 would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining eight rooms would experience an alteration in excess of 40% which is considered a Major Adverse effect.

878. All impacted windows and rooms have low existing values therefore resulting in a disproportionate percentage change. In most instances, the alterations are not considered to result in a noticeable loss and the Cumulative effect is considered to be Minor Adverse (not significant), compared to Negligible (not significant) as a result of the Proposed Development. The additional impacts are a result of the cumulative schemes coming forward.

33 Great St Helens

879. This residential building is located southeast of the site. A total of 11 windows serving four rooms were assessed for daylight within this building. Layouts obtained for this building by the applicant's consultant show these to be three bedrooms and one living room.

Proposed development:

880. For VSC, 6 of the 11 (54.5%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. Of the five affected windows, one would experience an alteration in VSC between 30-39.9% which is considered a Moderate Adverse effect whilst four would experience an alteration in excess of 40% which is considered a Major Adverse effect. However, the absolute changes to VSC would be no more than a 1.7% reduction. Four of the affected windows serve the three bedrooms at ground and first floor (which BRE Guidance states are considered less important) with existing VSC values below 3.3% and so the absolute alterations would not result in a noticeable change. The remaining window is a first floor living room which also has low existing values of 4.1% VSC and so the absolute loss would not be perceptible.
881. For NSL, one of the four (25%) rooms assessed would meet BRE's criteria and is therefore considered to experience a Negligible effect. Of the three affected rooms, all three are bedrooms which would experience an alteration in NSL greater than 40% which is considered a Major Adverse effect. BRE suggests that bedrooms are less sensitive compared with living rooms and dining rooms.
882. Overall, given the disproportionate percentage changes due to the low existing values, and only bedrooms seeing NSL impacts, with all other windows and rooms not being affected beyond BRE's criteria, the effect is considered Negligible to Minor Adverse (not significant).

Cumulative:

883. For VSC, two of the 11 (18.2%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. Of the nine affected windows, two would experience an alteration in VSC between 30-39.9% which is considered a Moderate Adverse effect whilst seven would experience an alteration in excess of 40% which is considered a Major Adverse effect. The absolute change to VSC would be no more than a 2.9% reduction.
884. For NSL, all four rooms assessed see losses greater than recommended by BRE. 12.248 Of the four affected rooms, all would experience an alteration in NSL greater than 40% which is considered a Major Adverse effect.
885. Whilst additional windows and rooms would see impacts, these have low existing values therefore resulting in a disproportionate percentage change. Although isolated additional impacts occur, given the low baseline values the cumulative effect is considered to be Minor to Moderate Adverse (significant), compared to Negligible to Minor Adverse (not significant) in the Proposed Development scenario. The additional impacts are a result of cumulative

schemes coming forward. In this context it is not considered that the proposal would result in an unacceptable impact

50 Bishopsgate

886. This building is located southeast of the site. The layouts of this premises show that the Site facing room at first floor comprises refuse storage and this room has therefore been discounted from the assessment as it is a non-habitable room. The consented floorplans show that the three Site facing rooms at second, third and fourth storey are living rooms. As such, a total of five windows serving three rooms were assessed for daylight within this building.

Proposed development:

887. For VSC, all five windows assessed see losses greater than recommended by BRE. Of the five affected windows, all would experience an alteration in VSC greater than 40% which is considered a Major Adverse effect. These windows serve three rooms at second, third and fourth storey, which are thought to be living rooms. Two of the three rooms (2nd & 3rd floors) are each served by two windows. They have existing values below BRE's recommendation ranging from 8.6-10.7% VSC and so the percentage alterations are disproportionate to what the occupants are likely to experience.

888. For NSL, all three rooms assessed see losses greater than recommended by BRE. Of the three affected rooms, one would experience an alteration in NSL between 30-39.9% which is considered a Moderate Adverse effect whilst two would experience an alteration in excess of 40% which is considered a Major Adverse effect. All three rooms have existing NSL values below 25% there is no greater change than 1.5 sq.m and therefore the alterations are disproportionate to what the occupants are likely to experience.

889. Overall, given that the affected rooms are living rooms, the effect is considered Major Adverse (significant). However, due to the existing levels of daylight the percentage reduction is disproportionate, and the absolute reduction is limited to between 2.6% and 3.9% and this should be taken into consideration. In this context it is not considered that the proposal would result in an unacceptable impact.

Cumulative:

890. No additional impacts would result from the cumulative schemes.

St Helens Church Bishopsgate

891. The religious building (nave) and auxiliary building have been assessed for daylight and are located south east of the site. The nave is in close proximity to 5-7 Great St Helen's to the north, with the west facing windows of both the nave and auxiliary building overlooking 35 Great Helen's to the west. These windows of the nave and auxiliary building, which are considered within the assessment are therefore already obstructed and receive low levels of daylight (VSC and NSL) in the baseline condition. The windows assessed face the Site such that they have an oblique view of the Proposed Development. A total of 49 windows serving 13 rooms were assessed for daylight within this building.

Proposed development:

892. For VSC, 31 of the 49 (63.3%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. Of the 18 affected windows, two would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect. Three of these windows would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect. The remaining 13 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect. A total of 15 windows serve the nave and the remaining 7 serve the auxiliary building, which is of unknown use however this has been assessed as a worst case. Due to the low levels of VSC received at both the nave and auxiliary building windows in the baseline condition, the percentage alterations are disproportionate with the Proposed Development coming forward. There is no change to absolute VSC above 4%, which may not be a perceptible reduction. Therefore, the Proposed Development is not considered to significantly affect the level of VSC received at both buildings.

893. For NSL, 10 of the 13 (76.9%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. Of the three affected rooms, one would experience an alteration in NSL between 20-29.9% which is considered a Minor Adverse effect whilst two would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect. The three affected rooms are located on the south western corner of the auxiliary building. The south facing windows are obstructed by 1 Undershaft and so rely on sky visibility from the west facing windows. These three rooms, located at ground, first and second floor have low baseline NSL values, below 31% NSL. Therefore, the percentage alterations are disproportionate to the absolute losses in sky visibility which are unlikely to be noticeable. The use, and therefore sensitivities, of these rooms within this building are not known.

894. Overall, percentage changes beyond BRE's criteria occur to VSC at both the nave and auxiliary buildings. However, these are disproportionate percentage reductions due to the low baseline daylight values and the absolute reductions are unlikely to be perceptible. The nave is unaffected in terms of NSL, with three rooms of the auxiliary building, which is of unknown use seeing

disproportionate changes. There is a high level of compliance for both VSC and NSL in both the nave and auxiliary building, with most windows and rooms unaffected by the Proposed Development coming forward. Therefore, the effect is considered Negligible to Minor Adverse (not significant).

Cumulative:

895. For VSC, eight of the 49 (16.3%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. Of the 41 affected windows, one would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect, and seven would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect. The remaining 33 windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.
896. For NSL, five of the 13 (38.5%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. Of the eight affected rooms, two would experience an alteration in NSL between 30-39.9% which is considered a Moderate Adverse effect whilst six would experience an alteration in excess of 40% which is considered a Major Adverse effect.
897. All impacted windows have low existing values therefore resulting in a disproportionate percentage change when compared to the absolute reduction in value. In most instances, the alterations are not considered to result in a noticeable change and the Cumulative effect is considered to be Minor to Moderate Adverse (significant), compared to Negligible to Minor Adverse (not significant) as a result of the Proposed Development. The additional impacts are a result of cumulative schemes coming forward. Overall it is therefore considered that the proposed development would not have an unacceptable impact.

78 Bishopsgate (St Ethelburga's Centre)

898. This religious building is located north east of the site. The windows on the front of this building have an oblique view of the Proposed Development. All other windows are located to the rear of the religious building. A total of 24 windows serving four rooms were assessed for daylight within this building.

Proposed development:

899. For VSC, 22 of the 24 (91.7%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. Of the two affected windows, both would experience an alteration in VSC between 30-39.9% which is considered a Moderate Adverse effect. Both windows are located at ground floor at the front of the building facing onto Bishopsgate. One of the windows next to the entrance is very small, and the other is above

the door. Their baseline VSC values are relatively low (10-11% VSC) due to the ground floor location and the built up nature of the surrounding context. As such, the percentage alterations are disproportionate to the absolute losses (below 3.9% VSC) which are unlikely to be noticeable.

900. For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect. Overall, alterations to VSC occur to two windows at the front of this building, facing on Bishopsgate. They have low baseline values, resulting in disproportionate percentage changes, with the absolute reductions unlikely to be perceptible and most windows and rooms being unaffected. The effect is considered to be Negligible to Minor Adverse (not significant).

Cumulative:

901. For VSC, 18 of the 24 (75%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. Of the six affected windows, two would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect whilst four would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect.
902. For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect.
903. Whilst four additional windows would see VSC impacts, these have low existing values therefore resulting in a disproportionate percentage change. Although isolated additional impacts occur to four windows, given the low baseline values and NSL compliance the effect is considered to remain Negligible to Minor Adverse (not significant).

25 Wormwood Street

904. This residential building is located north of the site. A total of 21 windows serving 11 rooms were assessed for daylight within this building.

Proposed:

905. This building would experience a negligible effect.

Cumulative:

906. For VSC, all windows assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

907. NSL, 10 of the 11 (90.9%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The affected room would experience an alteration in NSL of 20.4% which is technically considered a Minor Adverse effect; however, this is only marginally above the threshold for what is considered a noticeable change. Therefore, the overall effect is considered to remain Negligible (not significant).

4 Heneage Lane Spanish and Portuguese Synagogue

908. This religious building is located east of the site. A total of 23 windows serving two rooms were assessed for daylight within this building.

Proposed:

909. This building would experience a negligible effect.

Cumulative:

910. For VSC, 15 of the 23 (65.2%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. Of the eight affected windows, three would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and two would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. The remaining three windows would experience an alteration in excess of 40% which is considered a Major Adverse effect.

911. For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect. All impacted windows have low existing values therefore resulting in a disproportionate percentage change. In most instances, the alterations are not considered to result in a noticeable loss and so the cumulative effect is considered to be Minor Adverse (not significant), compared to Negligible (not significant) as a result of the Proposed Development. The additional impacts are a result of cumulative schemes coming forward.

2 Heneage Lane

912. This residential building is located east of the site. A total of six windows serving five rooms were assessed for daylight within this building.

Proposed:

913. This building would experience a negligible effect.

Cumulative:

914. For VSC, five of the six (83.3%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The affected

window would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect. Due to the existing VSC value it is not likely to be a noticeable change.

915. For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a Negligible effect.
916. The cumulative effect is considered to remain Negligible (not significant).

Sunlight to neighbouring buildings

917. 11 of the 14 buildings assessed are located north of the site with windows facing within 90 degrees of the proposed development. There 11 buildings are:
- 1-24 Wormwood Street
 - 25 Wormwood Street,
 - 26 Wormwood Street,
 - 33 Great St Helens
 - Merchant Taylor's Hall B1,
 - Drapers Hall,
 - 4 Heneage Lane Spanish and Portuguese Synagogue,
 - St Botolph Church
 - St Helens Church
 - 78 Bishopsgate
 - 7 Austin Friars
918. Of the 238 windows assessed for APSH in the existing baseline, none would meet BRE's criteria of receiving 25% APSH of which 5% is in winter, in during the winter months.
919. In the proposed scenario all windows assessed are considered to experience a Negligible (not significant) effect.
920. In the cumulative (Tier 1) scenario eight sensitive buildings would experience no additional effects. The remaining three buildings would see additional effects in the cumulative scenario.

1-24 Wormwood Street

921. A total of 118 windows were assessed for sunlight within this building of which 114 (96.6%) would meet the BRE's criteria for both APSH and Winter PSH.
922. For APSH, all windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

923. For Winter PSH, 114 of the windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The remaining four windows would see a loss greater than 40% which is considered a Major Adverse effect. All impacted windows affected in winter have low existing values therefore resulting in a disproportionate percentage change. As such, the alterations are not considered to result in a noticeable change and the Cumulative effect is considered to be Minor Adverse (not significant), compared to Negligible as a result of the proposed development. Therefore, the additional isolated impacts are a result of cumulative schemes coming forward.

33 Great St Helens

924. Six windows were assessed for sunlight within this building.

925. For APSH, four windows would meet BRE's criteria and are therefore considered to experience a Negligible effect. The remaining two windows would see an alteration greater than 40 % which is considered a Major Adverse effect.

926. For Winter PSH, these two windows would also see an alteration greater than 40% which is considered a Major Adverse effect. All impacted windows have low existing values therefore resulting in a disproportionate percentage change. As such, the alterations are not considered to result in a noticeable change and the cumulative effect is considered to be Minor Adverse (not significant), compared to Negligible as a result of the proposed development. Therefore, the additional impacts are a result of cumulative schemes coming forward.

St Helens Church Bishopsgate

927. This religious building is located south east of the site. A total of 12 rooms were assessed for sunlight within this building of which 11 (91.7%) would meet the BRE's criteria for both APSH and Winter PSH.

928. For APSH, 11 of the 12 (91.7%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The remaining room sees a loss greater than 40% which is considered a Major Adverse effect.

929. For Winter PSH, 11 of the 12 (91.7%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect. The remaining room sees a loss greater than 40% which is considered a Major Adverse effect. All impacted windows have low existing values therefore

resulting in a disproportionate percentage change. As such, the alterations are not considered to result in a noticeable change and the cumulative effect is considered to be Minor Adverse (not significant), compared to Negligible as a result of the proposed development. Therefore, the additional impacts are a result of cumulative schemes coming forward.

Sunlight to Amenity Spaces

930. The potential impacts of the Proposed Development on the sunlight availability on surrounding amenity areas has been assessed against the Baseline Scenario.
931. The surrounding amenity areas considered sensitive to overshadowing are:
- Finsbury Circus
 - St Botolph without Bishopsgate gardens and tennis court
 - Jubilee Gardens
 - Devonshire Square (A)
 - Devonshire Square (B)
 - Devonshire Square (C)
932. The surrounding amenity areas have been quantitatively assessed against the BRE sun hours on ground criteria. All amenity areas would see little to no alteration (0-1% change) from the percentage of total area which sees at least two hours of direct sunlight on March 21st, when comparing the baseline scenario with the Proposed Development scenario. Therefore, all amenity areas would experience a Negligible (not significant) overshadowing effect.

Conclusion on Daylight & Sunlight impact

933. Overall, whilst there are some impacts in excess of BRE guidance, due to the context of the individual properties assessed it is not considered that the proposal would result in any unacceptable impacts and is therefore in compliance with Local Plan Policy DM10.7, London Plan Policy D6(d), and Draft City Plan Policy DE8.

Transient Overshadowing

Proposed development:

21st March

934. On this day, shadow would be cast from the Proposed Development from 8am and the shadow would move in a clockwise direction throughout the day. At this time, none of the identified surrounding amenity areas would be cast in shadow. Between 9am and 10am, shadow from the Proposed Development would move across Finsbury Circus Gardens.

935. Due to shadows cast by existing structures, the Proposed Development would not result in any additional shadow to the remaining sensitive amenity areas on this day.

21st June

936. On this day shadow would be cast from the Proposed Development from 6am and the shadow would move in a clockwise direction throughout the day. Due to shadows cast by existing structures, the Proposed Development would not result in any additional shadow to the remaining identified sensitive amenity areas on this day.

21st December

937. On this day shadow would be cast from the Proposed Development from 9am and this shadow would move in a clockwise direction throughout the day. Due to shadows cast by existing structures, the Proposed Development would not result in any overshadowing to the identified sensitive amenity areas on this day.

938. 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.

Cumulative Tier 1:

939. No additional cumulative shadowing would occur to the surrounding sensitive amenity areas. The effect therefore remains Negligible (not significant) to all sensitive amenity areas.

Cumulative Tier 2:

940. No additional effects would occur to sensitive amenity areas. The cumulative overshadowing effects therefore remain as reported in the Tier 1 assessment.

Solar Glare

941. 60 road locations and 2 railway line 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.

942. The assessment concludes that the development would have no effect or a negligible effect on 35 of the locations.

943. Of the remaining 27 locations eight would experience a negligible (not significant) effect. Although solar reflections occur within 30° of a driver or

road user's line of sight, these instances would occur for a very short period of time on a very limited portion of the façade, or there is at least one other viewpoint per location which is unaffected.

944. A total of 19 locations remain where there is at least one viewpoint which sees the potential for solar glare within 30° of a road user or train driver's line of sight. At 13 of these, the effect is considered to be Minor Adverse (not significant). This is because reflections occur within 30° of a road users' line of sight but beyond 10° or between 5° and 10° for a short period of time. Additionally, most of these locations comprise more than one viewpoint looking towards multiple signals where at least one viewpoint is unaffected.
945. The final six locations are considered to have minor to moderate, and moderate adverse effects to five locations, with one location reporting major adverse effects (travelling north along Bishopsgate towards the proposed development). The ES concludes that although there are some viewpoints which may experience solar glare effects in a worst-case scenario, no additional mitigation is deemed necessary when the building is seen from a distance. This is due to the short duration of effects, and the lower intensity of potential reflections, which reduces the chances of them resulting in glare. For the affected (major adverse) viewpoint, the potential for the reflections to result in glare will be mitigated by using a low reflectivity glazing on the external glazed skin of the satellite building (south façade). In order to avoid the inner glazed skin of the façade modules picking up reflections, the venetian blinds provided within the closed cavity façade will be deployed when necessary. It is recommended that these blinds should have a non-specular/matt finish in order to diffuse incident sunlight, as opposed to reflecting in a mirror-like fashion.
946. Overall, subject to the mitigation measures identified it is considered that the effects on Solar Glare would be acceptable.
947. 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.

Light Pollution

948. 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.

949. The potential light spillage impacts arising from the Proposed Development upon the surrounding existing residential buildings has been assessed. The assessment shows that post-curfew (after 11pm), the levels of light trespass would be below the 5-lux threshold set out within the ILP guidance for three of the buildings assessed (24 and 25 Wormwood Street and 33 Great St Helens) and concludes negligible and no significant effects.
950. At 50 Bishopsgate, located directly opposite the proposed development, light spillage would exceed the 5 lux threshold set out in ILP Guidance to the site facing windows. The first floor windows serve a non-habitable room. At second to fourth floor the assessment shows lux levels marginally above the threshold post curfew in some instances and concludes that there would likely be moderate adverse effects to these windows. It is suggested that mitigation could include ensuring visible external lighting is of low intensity; blinds to the façade are operated at night; and light fittings are controlled through the use of sensors that switch on and off according to occupancy.
951. 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.
952. 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.

Thermal Comfort Assessment

953. 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.

954. 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.
955. 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.
956. Three configurations have been assessed including; the existing site with existing surrounding buildings, the proposed development with existing surrounding buildings, and the 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

957. The areas that have been assessed are ground level at and around the site, the roof level terrace on the proposed development and the terrace at 99 Bishopsgate to the north of the site

Offsite Ground Level

958. The Existing conditions at ground level are largely in the 'Short-term' category along Bishopsgate, with a region of 'Short-term Seasonal' between 22 Bishopsgate and the existing Site. This region of lower comfort is due to the

higher winds in this location driven by downwash from 22 Bishopsgate. Great St Helens is borderline between 'Short-term' and 'Short-term Seasonal', and there are small regions of 'Short-term Seasonal' to the east of 1 Undershaft, south of Tower 42, north of 100 Bishopsgate on Camomile Street, and through the centre of 100 Bishopsgate. The local thermal comfort conditions are primarily driven by the wind conditions caused by the surrounding developments which were developed and built prior to the introduction of the City of London Wind Microclimate Guidelines and City of London Thermal Comfort Guidelines.

959. The effect of the proposed development on the ground level areas offsite would be varied and complex. Conditions on Bishopsgate to the west of 22 Bishopsgate and further south would be improved, along with Threadneedle Street. Conditions on Bishopsgate to the east of 55 Bishopsgate and further north would also be improved. However, to the south-east of 55 Bishopsgate the region of 'Short-term Seasonal' comfort that is present in the existing scenario would extend to the north with the addition of the proposed development. Additionally Great St Helens to the north of 22 Bishopsgate would shift from 'Short-term' to 'Short-term Seasonal' with the addition of the proposed development. The conditions around 1 Undershaft would improve, with a significant area shifting up a category. The conditions around the base of Tower 42 would generally improve, with an area of 'Short-term Seasonal' on the south-east side reducing in size by around half. The conditions on Old Broad Street would generally drop a category, with a region of 'Short-term' becoming 'Short-term Seasonal' with the addition of the proposed development. The conditions around the base of 100 Bishopsgate would remain largely the same, however a region on the south-west corner would drop from 'Short-term' to 'Short-term Seasonal'. The conditions on Camomile Street and into Wormwood Street would drop a category from 'Short-term' to 'Short-term Seasonal'.
960. The effect of the proposed development on the thermal comfort of the existing pedestrian realm is expected to be negligible, with the areas that experience worse thermal comfort conditions generally being roadways where pedestrians are less likely to dwell, while those areas seeing improved conditions are those used for longer periods such as around Tower 42 and St. Helen's Gardens.

99 Bishopsgate Terrace

961. The existing conditions on the terrace at 99 Bishopsgate are largely in the 'Seasonal' category with a region on the east side in the 'Short-term' category. With the proposed development the area classified as 'Short-term' would improve with around half of the area shifting into 'Seasonal'. However, on the south side a region of 'Seasonal' would shift into 'Short-term', while the effects on the north and west sides are marginal. These changes in category are due to changes in the winter acceptability, while the spring, summer and autumn acceptability remains above 80% for the whole terrace in all cases. Therefore,

the effect of the proposed development on the thermal comfort of the 99 Bishopsgate terrace is expected to be minimal.

Onsite Ground Level

962. The conditions at ground level of the proposed development would largely be in the 'Short-term' category, with regions to the north and east of the main tower in the 'All Seasons' and 'Seasonal' bands, and small regions under the satellite building and to the west of the main tower in the 'Short-term Seasonal' category. This is therefore considered appropriate for use year-round.

The public viewing terrace on the proposed development

963. The conditions on the public viewing terrace would be almost entirely within the 'Short-term' category, with the sheltered regions around the edge and towards the centre in the 'All Seasons' and 'Seasonal' bands. This is therefore considered appropriate for use as a public viewing terrace year-round.

Thermal Comfort Conclusion

964. 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.

Air quality

965. Local Plan 2015 policy CS15 seeks to ensure that developments positively address local air quality. Policy DE1 of the draft City Plan 2040 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.

966. 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.

967. 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.

968. The BREEAM Pre-assessment demonstrates that the scheme is 'Outstanding' in the Pollution category.
969. Overall, the proposed development would have a non-significant effect on air quality, during both the construction and operational phases, with the exception of a minor adverse local impact on 48 Bishopsgate in the completed development from transport emissions, with mitigation measures to be explored in the detailed design phase. The proposed development would be Air Quality Neutral and meets the Air Quality Neutral benchmarks for both building and transport emissions assessment.
970. The City's Air Quality Officer has no objections. Conditions are recommended 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.
971. Subject to conditions, the proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2040, and policy SI of London Plan which all seek to improve air quality.

Noise and Vibration

972. 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.
973. 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.
974. 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, 48 and 50 Bishopsgate, and 33 Great St Helen's during the demolition and construction phases. All other receptors are predicted to result in Moderate or Minor Adverse, or Negligible effects (not significant given the temporary nature).
975. 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.

976. 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.
977. 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.
978. 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.
979. The submitted EIA indicates that the requirements 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

980. 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.
981. 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.
982. There are 4no. residential units at 50 Bishopsgate, which is opposite the development site. Slightly further east there are 3no. residential units at 33 Great St Helen's. The HIA addresses potential disturbance from construction noise for the neighbouring sensitive receptors and states that the Construction Environmental Management Plan will enable mitigation of disturbance.
983. 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 site including the 'Conservatory' and viewing platform rooftop, with public access to a pleasant, green amenity space.
- Provision of high-quality, flexible public realm at the ground floor and widening of the pavement, improving the physical environment and contributing to social cohesion.
- A car-free (except the two disabled bays) 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.

984. Potential negative impacts identified would need to be mitigated during the construction and operational phases, for example by:
- Preparation and agreement of Construction Environmental Management Plan (CEMP) to address any adverse amenity impacts arising from demolition and construction; and
 - Potential to widen footway on Bishopsgate to improve pedestrian comfort and safety – to be agreed through Section 278 agreement following further engagement to TfL.

985. 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 2040 policy S1.

Sustainability

Circular Economy

986. 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.

987. The application includes considerations as to whether there is an opportunity to retain and refurbish the building or building elements currently on site.
988. The existing building was completed in the early 1990s and it was designed to be adaptable with a 9m x 9m structural grid and floor to floor heights ranging from 4.03m to 4.58m. The façade was designed to meet 1990 building regulations and has not been significantly upgraded since.
989. A material audit has been undertaken and 4 development options have been appraised based on the methodology requested by the CoL draft Whole Life-Cycle Carbon Optioneering Planning Advice Note (2022), available at the time of application submission. These are:
- **Scenario 1: Light refurbishment:** This option retains the existing building with repairs and some replacement fabric and plant.
 - **Scenario 2: Heavy refurbishment including extension:** This option includes the retention of sub and superstructure, 3 additional floors, full plant replacement and some façade replacement, resulting in a 53% increase in GIA.
 - **Scenario 3: Façade retention and redevelopment to create a tall building:** This option creates a podium within retained facades and the development of a tall building within it, resulting in a 277% increase in GIA.
 - **Scenario 4: Redevelopment to create a tall building:** This option represents the application scheme and comprises full demolition of the existing building, resulting in a 319% increase in GIA.
990. The building's appearance, internal layout and daylight levels are considered to fall short of current occupier expectations. The existing building is not considered to be adaptable to incorporate permeability for connections to adjoining, evolving developments and a better choice of routes to key transport nodes that would have acceptable pedestrian comfort levels.
991. Overall, the analysis of the options demonstrates that there are benefits and disadvantages of each option with regard to demolition impacts, anticipated carbon intensity, potentials to improve energy efficiency and internal comfort and urban greening. However, due to the location in the area of the Eastern Cluster, the applicants consider the site to provide an opportunity for significant floorspace uplift along with wider public and environmental benefits relating to publicly accessible, cultural uses within the building and wider public realm improvements that would respond to current occupiers' demand of 'best in class' sustainable buildings and to the Destination City strategy in the round. The resulting high whole life-cycle carbon impacts of the preferred scenario 4 will be addressed by developing mitigation strategies relating to maintaining the existing materials at maximum value through reuse and procurement of second-hand materials as a priority. Innovative ways to

reduce carbon intensity will be pursued throughout the development process and required to demonstrate through submitting further information under the conditions.

992. The options assessment was subject to review by a 3rd party expert, in this case at high level as the final Carbon Options Guidance Planning Advice Note and the 3rd party review requirement and criteria were not available until March 2023. The review concluded that the optioneering has been carried out in compliance with the Carbon Options Guidance.

The application proposal:

993. 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.
994. A pre-demolition audit has been undertaken and submitted. The circular economy strategy includes details to support reuse and recycling of existing materials as well as sustainable sourcing, to include:
- Careful deconstruction to maximise the re-use of materials
 - Identifying and contacting re-use/recycling specialists early about the available materials
 - Engaging a contractor early to prepare a Site Waste Management Plan to manage demolition, excavation and construction waste, including provision of adequate storage space on site for material retention and processing
 - Cooperation with other developers to maximise re-use and local sourcing of materials
 - Considering the use of a material passporting platform to support the end-of-life stage.
995. 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 is required by conditions.

Operational energy strategy and carbon emissions

996. The Energy Statement accompanying the planning application demonstrates that the development has been designed to achieve an overall 21% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building. This compares to an over 40% reduction beyond Part L 2013 which demonstrates that the building is designed to achieve an operational carbon emissions reduction similar to the level of other City office developments approved in recent years.

997. Energy demand and the risk of overheating would be reduced by including the following design measures:
- Heat recovery
 - Free cooling when external conditions allow, bypassing active cooling
 - Active cooling provided by air source heat pumps and high efficiency air cooled chillers There would be a reduction of the building's cooling demand by 26% compared to the notional building.
 - Solar shading analysis and glazing performance optimisation, resulting in 60% glazing area with solidity provided by the exoskeleton, a raised stack joint and spandrel panels
 - Low lighting density with zonal control, task lighting and smart sensors.
998. The strategy would cumulatively reduce the building's operational carbon emissions by 15% compared to a Building Regulations 2021 compliant building which meets the GLA's target of 15% of carbon emission savings from energy efficiency measures for non-residential buildings.
999. 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.
1000. In relation to low and renewable energy technologies, a system of air source heat pumps located at levels 19 and 20 of both building would provide space and domestic water heating, reducing the operational carbon emissions by a further 6% compared to a Building Regulations 2021 compliant building.
1001. The proposed building does not include a conventional open, flat roof area but a conservatory type enclosure. The integration of photovoltaics into the conservatory enclosure and building facades will be further explored to address the complexity of the façade and the energy generation potential.
1002. Further improvements will be sought during the detailed design phase to optimise the solidity of the façade, incorporate further shading devices, explore new glass technologies, increase vent area for natural ventilation, optimise MEP systems, reduce lighting consumption and using Building Integrated Photovoltaics (BIPV) for the conservatory glass roof.

Energy Use Intensity (EUI)

1003. 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(GIA)/year and a space heating demand of 15 kWh/m²(GIA)/year. The estimated EUI from the proposed development is 68 kWh/m²/year and

for the space heating demand 1.09 kWh/m²/year. These are conservative estimates at this stage, and the energy consumption is anticipated to decrease with further design and modelling detail and at operation stage in collaboration with tenants, monitoring and optimisation.

1004. 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.”
1005. 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

1006. A BREEAM New Construction 2018 (shell & core) pre-assessment has been prepared, targeting an “outstanding” rating with a score of 88.7. The pre-assessment is on track to achieve a high number of credits in the City of London’s priority categories of Energy, Water, Pollution and Materials, as well as the climate resilience credit in the Waste category.
1007. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2036 Policy DE1. A post construction BREEAM assessment is required by condition.

NABERS UK

1008. This certification scheme rates the energy efficiency of a commercial building from 1 to 6 stars over a period of 12 months of operation. The proposals target a 5.5 star (out of 6 possible) rating.

WELL Building Standard

1009. A WELL assessment for a base building (WELL ‘Core’ certification) focuses on human health, requiring design and operation to prioritise health and wellbeing. The proposal is pursuing a WELL Building Standard v2 (WELL) certificate with a Platinum rating, the highest rating available.

Whole life-cycle carbon emissions

1010. 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-carbon city target.

Carbon options:





1011. The carbon options appraisal has been undertaken in line with the City of London's draft optioneering planning advice note (2022) available at the time of application submission. 4 options have been assessed:

- light refurbishment
- heavy refurbishment including extension
- façade retention and redevelopment to create a tall building
- redevelopment to create a tall building

1012. The assessment of the 4 scenarios 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. As expected, the light refurbishment option results in the lowest carbon intensity per square meter while the tall building redevelopment generates the largest amount of carbon emissions per square meter, both with and without decarbonisation applied to the whole life-cycle carbon emissions. The difference between the 2 tall building scenarios remains small throughout the 60-year reference period and is subject to higher embodied carbon intensity of scenario 4. This would be the case for both upfront embodied carbon emissions and whole life-cycle carbon emissions.

1013. The quantitative results from the optioneering study are set out in the table and graphs below, to include grid decarbonisation (National Grid's Future Energy Scenarios 'Steady Progression') applied to the operational energy

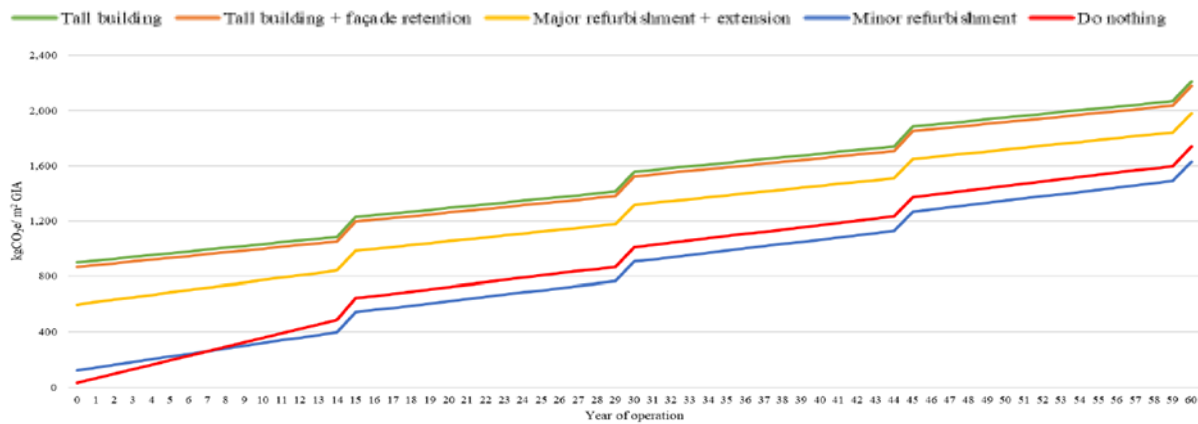
(“with decarb”) as well as based on the current status of the grid (“without decarb”).

					
	Minor refurbishment	Major refurbishment + extension	Tall building + façade retention	Tall building	
Gross Internal Area (GIA)	27,481	38,163	113,874	126,497	m ²
Net Internal Area (NIA)	17,416	26,624	65,718	73,020	m ²
Increase in NIA	0	53	277	319	%
% material retained of existing	90	67	13	0	%
Embodied Carbon (A1-A5)	104	459	854	887	kgCO ₂ e/m ² GIA
Embodied Carbon Total (A1-A5)	2,858	17,518	97,276	112,230	tCO ₂ e
Embodied Carbon (A1-A5, B1-B5, C1-C4)	604	959	1,377	1,410	kgCO ₂ e/m ² GIA
Whole building Operational Energy	113	99	94	94	kWh/ m ² /yr
Operational Energy (B6) (without decarb)	1,026	899	803	803	kgCO ₂ e/m ² GIA
Operational Energy (B6) (with decarb)	320	280	147	147	kgCO ₂ e/m ² GIA
Fuel source	Gas, electricity	Gas, electricity	Electricity	Electricity	
WLC Intensity (without decarb)	1,630	1,981	2,180	2,212	kgCO ₂ e/m ² GIA
WLC Total (without decarb)	44,807	75,603	248,144	279,862	tCO ₂ e
WLC Intensity (with decarb)	924	1,363	1,524	1,557	kgCO ₂ e/m ² GIA
WLC Total (with decarb)	25,399	52,020	173,517	196,943	tCO ₂ e

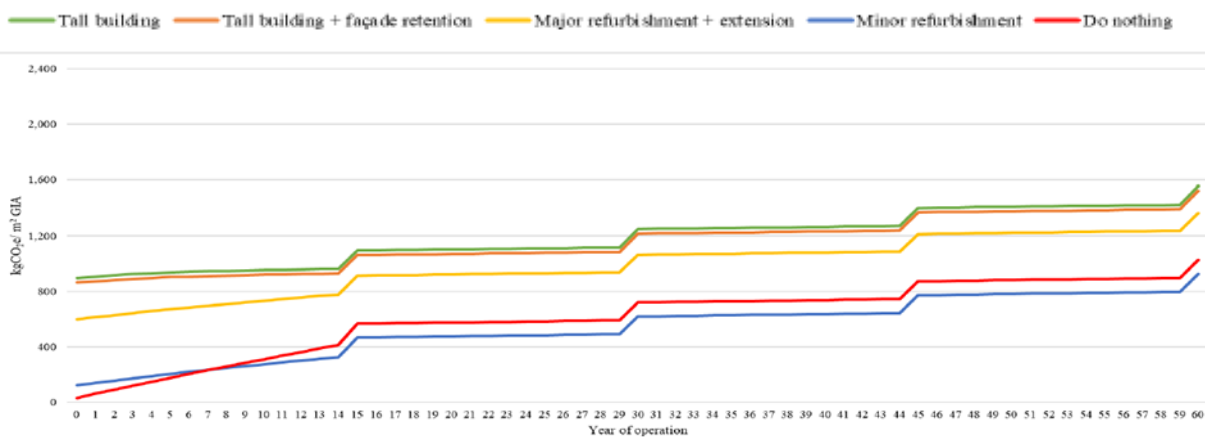
1014. The graphs below show whole life-cycle carbon emissions for each option in context of the “do nothing” scenario (red line). As to be expected, the difference shows in the steeper increase of the carbon emissions of each option, due to the different decarbonisation scenarios applied. The absolute and square meter based carbon emissions would be the highest for the tall building option due to the proposed scale. The operational carbon emissions

would be significantly higher in the refurbishment schemes for which a split between gas and electricity until 2045 (15 years after refurbishment) has been assumed, and with decarbonisation of the grid applied would create a greater performance gap between refurbishment and tall building options that would impact on future operational energy costs.

Whole Life Carbon emissions over 60 years
Cumulative results - without decarbonisation



Whole Life Carbon emissions over 60 years
Cumulative results - without decarbonisation



1015. The applicants acknowledge the high embodied carbon impact of the tall building scenarios, however, the opportunities and benefits of urban densification within the Eastern Cluster are prioritised. In environmental terms, the benefits of the tall building scenario relate to improvements to the public realm around the building with significant greening and accessibility improvements, as well as the creation of energy efficient, climate resilient, commercial and publicly accessible spaces that would contribute to the flexibility, vibrancy and longevity of development and the City as a whole. The applicants commit to incorporating carbon impact mitigation strategies into the detailed design that will drive forward best practice for the proposed building type. These would relate to re-use of deconstruction materials and innovative ways to reduce the carbon intensity of the development.

The application proposal:

1016. The submitted whole life-cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table below. The results show that the embodied carbon emissions can be reduced beyond the GLA’s Standard Benchmark but they would not meet the Aspirational Benchmark. Carbon reduction measures have been incorporated, such as the use of higher strength steel in the mega frame that would reduce the required steel tonnage, as well as the use of low carbon steel for the mega frame. It is anticipated that further embodied carbon efficiency measures can be achieved during the detailed design development, for example with regard to the design of the substructure and the floor slabs. The detailed Whole Life-Cycle Carbon Assessment required by condition would demonstrate any improvements.
1017. In addition, a “Design for deconstruction of the façade system” report is required by condition which would reflect further detailed design work on the façades to enable easier maintenance, replacement and end of life reuse at highest possible value. This report would identify and confirm whole life-cycle carbon reduction opportunities of the façade system.
1018. The table below shows whole life-cycle carbon emissions per square meter in relation to the GLA benchmarks (embodied carbon without carbonisation applied) at planning application stage:

Scope	Proposed Redevelopment	Benchmark	GLA Benchmark
RICS Components	kgCO2/m2	kgCO2/m2	
A1-A5	863	<950	GLA Standard
		<600	GLA Aspirational
A-C (excluding B6-B7)	1385	<1400	GLA Standard
		<970	GLA Aspirational
B6-B7	610		
A-C (including B6-B7)	1996		

1019. These figures would result in overall whole life-cycle carbon emissions of 252,214,906 kgCO2 being emitted over a 60-year period. Of this figure, the operational carbon emissions would account for 77,111,815 kgCO2. The embodied carbon emissions 175,103,091 kgCO2 would account for 70% of

the building's whole life-cycle carbon, and further structural and material efficiencies would significantly reduce this impact.

1020. 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 are required by conditions.

Conclusion

1021. 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. The Local Plan policies require redevelopment to demonstrate highest feasible and viable sustainability standards in the design, construction, operation and end of life phases of development as well as minimising waste, incorporating climate change adaptation measures, urban greening and promoting biodiversity and minimising waste.
1022. The proposed development would deliver an energy efficient development of the highest quality that commits to an exemplar, high NABERS UK rating and is on track to achieve an "outstanding" BREEAM assessment rating. The proposals cannot meet the London Plan target of 35% carbon emission savings compared to a Part L 2021 compliant scheme which the GLA acknowledges will initially be difficult to achieve for commercial schemes, and the achievement of an overall 21% reduction is considered to be an acceptable result in the context of the targeted, exemplary BREEAM and NABERS UK performances.
1023. Due to its location in the tall buildings cluster, a significant uplift in floorspace is sought which would result in the highest total and per square meter whole life-cycle carbon emissions compared to the assessed minor and major refurbishment options. However, despite its tall structure, the embodied carbon emissions can be reduced to meet the GLA's Standard Benchmark, and the applicants commit to pursuing opportunities for further improvements during the detailed design stage to strive to minimise embodied carbon emissions for the tall building type. Circular Economy principles have been positively applied to achieve a long term, robust, low carbon, flexible and adaptable development and satisfy the GLA's Circular Economy Guidance. The building design responds well to climate change resilience by reducing solar gain, saving water resources and various opportunities for urban greening and biodiversity.

Urban Greening

1024. The proposed development would incorporate a modular seeded living wall system, which would provide the following benefits: mitigating air and noise pollution, capturing CO₂ while releasing O₂, combating the heat island effect, improving biodiversity and making the area healthier and more attractive, improving the wellbeing of people.
1025. Across the entire application site, the development achieves an Urban Greening Factor (UGF) 0.3 which is policy compliant.
1026. The increase in greening is integrated into the architectural approach on the building by incorporating measures such as landscaping, trees, green roofs, green walls and sustainable drainage.
1027. A condition has been requested by the GLA in relation to fire safety measures of the proposed green wall which would require consultation with the London Fire Brigade. Furthermore, the details of the proposed planting, green walls and green roof would be secured by condition, which would include a maintenance plan and irrigation details.

Biodiversity Net Gain

1028. The proposed development has a strong focus on inclusion of urban greening, with positive references to planting for resilience, habitat connectivity and biodiversity value. The inclusion of public realm at ground level is welcomed.
1029. A biodiversity net gain assessment was undertaken using the Defra biodiversity metric calculator to understand the biodiversity enhancements to the proposed development. The existing site comprises of only building and hardstanding habitats, these habitats are of negligible biodiversity value.
1030. Due to the existing negligible biodiversity value of the existing site, the assessment was based on the increase in habitat units. It is concluded that the proposed development would achieve a Net Biodiversity Gain of 0.27 relative to the existing site.
1031. Natural England were consulted on the application and have raised no objection.

Overheating

1032. The proposed development is highly glazed, which is often of detriment to climate resilience – in particular overheating due to solar gain – which is set to be exacerbated under all future climate scenarios. In this instance, the DAS describes a double-skin façade with solar control glazing on the internal

glazing to limit solar gain, combined with a sensor-based system to control venetian blinds within the interstitial cavity.

1033. The double-skin façade approach will provide additional benefits with respect to operation of the mechanical ventilation. Considering the scale and prominence of this building, and the desire for such buildings to be highly glazed, this approach appears reasonable. Furthermore, a Climate Change Risk Assessment and a thermal comfort analysis has been completed considering future climate scenarios.

Water Stress

1034. The proposed development is targeting all BREEAM credits for water efficiency and incorporates water efficient fixtures/fittings, as well as a 100% greywater recycling system. Rainwater harvesting will be incorporated if technically feasible, however remains under consideration and will be developed further at RIBA Stages 3 and 4, with details to be secured via condition.

Flooding

1035. The site is located in an area of low flood risk from all sources. No sustainable drainage elements are proposed to manage surface water, although 2x attenuation tanks are proposed to limit runoff rates to the combined sewer network. Rainwater harvesting will be incorporated if technically feasible, however remains under consideration and will be developed further at RIBA Stages 3 and 4, with details to be secured via condition.

Security

1036. London Plan Policy D11 ('Safety, security and resilience to emergency') states that development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.
1037. Local Plan Policy CS3 ('Security and Safety') seeks to ensure that the City is secure from crime, disorder, and terrorism.
1038. Local Plan Policy DM3.2 ('Security measures in new developments and around existing buildings') seeks to ensure that security is considered from an early stage of design development in connection with the City of London Police, with features integrated into the site boundary. Policy DM3.3 ('Crowded places') requires major development proposals to integrate

counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to night-time uses.

1039. The security proposals to protect the building, its users, and new areas of public realm have been developed in consultation with the Designing Out Crime Officer and the counter terrorism security officers within the City of London Police at pre-application stage.
1040. The site would be protected by a 'security line' to Bishopsgate in the form of HVM resistant bollards and planters, within the site boundary, with further details required through condition and the public realm management plan secured in the S106 agreement.
1041. The vehicle lifts down to the servicing bay, located in the 'loggia' area underneath the satellite building, would be surrounded by stowed balustrades and a gated entrance that would appear when the lifts were in use for servicing at night-time, ensuring that the lifts are only accessed by authorised parties.
1042. Staff and visitors to the office would access the building either through the 4no. escalators to Bishopsgate or the 2no. lifts to the north of the escalators, where they would arrive in large reception and be directed towards their relevant route with security measures. Cyclists wishing to use the long stay cycle parking to the lower ground floor level would enter the building through either the 2no. lifts in the 'loggia' space or the dedicated ramp stair. Once they have used the end of trip facilities, users would then make their way up to their relevant floor through dedicated lifts with security measures.
1043. Public access to the 'conservatory' and viewing platform would be via ground floor with dedicated lifts and stairs to a reception at lower ground floor level, where security protocol would be in place and express lifts would then take visitors up the building.
1044. 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.
1045. Further details of the overall security strategy will be required by condition and a Public Conservatory and Viewing Platform Management Plan will be required by S106 which will detail more specifically the measures to protect the building and its different user groups.
1046. 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.

Suicide Prevention

1047. The City Corporation has recently approved a guidance note “Preventing Suicide from High Rise Buildings and Structures” (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near the edges of balconies and terraces, as well as erecting balustrades.
1048. Policy DE5 of the draft submission City Plan 2036 advises that appropriate safety measures should be included in high rise buildings, to prevent people from jumping or falling.
1049. The guidance explains that strategically placed thorny or prickly plants (hostile planting) can delay and deter an individual trying to gain access to a dangerous location. The type of plant, its appearance and practical deterrent capability across all seasons should be considered within any assessment. The site arrangements should also consider what steps will be taken if the plants die or wither, so as to remove or significantly reduce the deterrent effect.
1050. The guidance explains that current legislation specifies appropriate heights and design for balustrades on balconies. Building Regulation K2 states the following:
- K2 – (A) Any stairs, ramps, floors and balconies and any roof to which people have access, and
(B) any lightwell, basement area or similar sunken area connected to a building,
 - Shall be provided with barriers where it is necessary to protect people in or about a building from falling.
1051. The guidance within the rest of the Approved Document K and the British Standard has a minimum height of 1.1m. The Regulation states that people need to be protected, and the designer should do a risk assessment and design the edge barrier accordingly, but with a minimum 1.1m height. Barriers and edge protection need to be appropriately designed and should take into consideration British Standard BS 6180: Barriers in and around buildings.
1052. Designers need to consider the suicide risk of a building and design edge protection to an appropriate height. If it is considered that there is a significant risk of people attempting suicide, barrier heights should be higher. UK Health Security Agency (UKHSA) main design recommendations for fencing on high rise buildings and structures advises a barrier height of at least 2.5 metres high, no toe or foot holds, and an inwardly curving top is recommended as it is difficult to climb from the inside. The barrier should be easier to scale from the

outside in case an individual wishes to climb back to safety. Developers must, as a minimum, comply with Building Regulation standards and, where feasible and practical, consider providing a barrier in line with UKHSA guidance.

1053. Where a barrier is installed, consideration should be given to its ongoing maintenance. Appropriate servicing, testing and maintenance arrangements must be provided to confirm its ongoing effectiveness. This should include consideration of the material (potential failure mechanisms, installation by approved contractor), the potential for wind loading (fences must be resistant to adverse weather), the weight load and anti-climbing requirements. Consideration should be given to any object placed against a wall or edge at a high level that can be used as a step by a vulnerable individual.
1054. Regarding the proposals, the only elevated element of the buildings that would be exposed to the outside would be the viewing platform at the top of the building, which would be surrounded by a glass safety screen, which complies with the guidance note. The height of the glass safety screen to the viewing platform and further management controls would be secured by condition.

Fire Statement

1055. 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 acceptable for the planning stage and is secured by condition.

Assessment of Public benefits and the paragraph 202 NPPF balancing exercise

1056. The proposal would result in less than substantial harm to the significance of listed buildings, including those listed Grade I, and therefore there is a strong presumption against the grant of planning permission. That presumption is capable of being rebutted via wider public benefits.
1057. 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.
1058. 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 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). Paragraph 200 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. As the statutory duty imposed by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged, considerable importance and weight must be given to the desirability of preserving the setting of listed buildings, when carrying out the paragraph 202 NPPF balancing exercise in relation to less than substantial harm to the significance of listed buildings.

1059. In this case, the less than substantial harm ranges from lower level to slight in relation to:

- Low levels of less than substantial harm have been found to the significance of Whitehall Court (grade II*), War Office/ Ministry of Defence (grade II*), and Horse guards (grade I);
- A significant, but lower level of less than substantial harm has been identified to the significance of St Pauls Cathedral (grade I)
- Low level of less than substantial harm has been found to the setting and significance of 52-68 Bishopsgate (Grade II);
- Slight levels of less than substantial harm (very much lower end of the spectrum) have been found to the significance of St Helen's Place Conservation Area and St James's Park (RPG);
- Otherwise, the significance and contribution of setting of a broad range of designated heritage assets would be preserved.

1060. Paragraph 202 requires this harm be weighed against the wider public benefits of the proposal including, where appropriate, securing optimum viable use.

1061. The key economic, environmental and social public benefits of the proposal are considered to be:

1062. Economic:

- The provision of 103,073 sqm (GIA) of grade A office floorspace, will contribute to 14 % of the overall projected office floorspace requirements for the City delivering an estimated net increase of 6350 FTE employees and dramatically increasing footfall. This uplift will contribute significantly to inward investment in the Square Mile and supports the strategic objective

to maintaining a world class city which is competitive and promotes opportunity.

- The cultural uses & offer, a rooftop viewing gallery and new public spaces would also drive footfall and spend in the City as well as provide amenity space for the wellbeing of workers and visitors.
- The 407 sqm (GIA) of affordable workspace at 4th floor level is secured at 50% market rents in perpetuity and is an inclusive offer which will attract smaller and more diverse businesses including SMEs to the City Cluster.
- Adjacent land uses and occupiers would also benefit from this increase in footfall and the high-quality amenities provided by the proposed development, the proposals would contribute to the amenity of the wider area, the greater provision of services and activities would help create an attractive environment for wider investment.
- The overall quality of the development and proposals offer would attract visitors, increase tourism, support and improve worker productivity and enhance the image of the area.

1063. Collectively these are attributed a **substantial** weight

1064. 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 including LVMF views from: Alexandra Place (1A); Primrose Hill (2A); Kenwood (3A); Primrose Hill (4A); Greenwich Park (5A); Blackheath Point (6A).
- It would deliver growth in a highly sustainable location which will assist in the delivery of the City of London's Transport Strategy, 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 permeable public space, active and cultural uses which will enhance the vitality, character and distinctiveness of the site and wider City Cluster, including new views and heritage appreciation all which align with Destination City aspirations.
- The space has been designed to be flexible to fit into the future master planning of the City Cluster and network of future routes towards Liverpool Street and designed to accommodate increased pedestrian flows.
- The improvements to the public realm for pedestrians and cyclists, including pavement widening and streetscape enhancements, would encourage active travel and support the wellbeing of users, constituting a key social and environmental benefit in a highly congested area, subject to the detail being confirmed through a s278 agreement and s106 financial contributions for the enhancement of streets and spaces.
- The s106 contribution in respect of the St Pauls Lighting scheme which will have a far-reaching visual impact at night-time giving primacy to the Cathedral after dark on the skyline in river prospects, panoramic and local

views and a further s106 contribution in respect of the St Paul's Cathedral Golden Ball and Cross Project.

1065. Collectively these are attributed a **moderate** level of weight

1066. Social:

- The proposal would deliver a new social space at ground level in an area with limited deprived open space for workers, visitors and residents and provide opportunities for relaxation and leisure;
- Learning and educational opportunities associated with the cultural spaces at lower ground, 2nd and 3rd floor level, with a significant scope for apprenticeships through the commercial floor space uplift.
- The proposal will include the provision for Cultural Events to bring a new dynamic to the City and facilitate a 7/7 Destination City.
- Unique ecological and climate change focussed conservatory space which will be largely free to access, with multi-functional use, and 360-degree views across the City which will have a different look and feel to other roof terraces across the Square Mile. The programming of cultural events in this space will contribute to the variety of rooftop spaces in the city cluster.
- The proposal would secure a S.106 obligation of £4,831,299.00 towards affordable housing provision.
- The proposal would secure £200,000 towards the St Paul External Lighting project which would improve the visual profile of the Cathedral against the skyline in views towards the City Cluster, particularly at night.
- The proposal would secure £250,000 for the St Paul's Cathedral Golden Ball and Cross project, to regild the ball and cross of St Paul's Cathedral which has faded over years. The project will include working with the Goldsmiths and support skills and professional development for apprenticeships.

1067. Collectively these are attributed a **Moderate to Substantial** level of weight.

1068. In terms of the low level of less than substantial harm to St Paul's Cathedral, Horse Guards and slight harm to St James's Park (RPG) given that they are Grade I designated heritage assets of the highest order particular weight 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 low level / slight less than substantial harm caused to the significance of the 52-68 Bishopsgate and slight level to St Helen's Place Conservation Area, the overall harm must still be proportionate to the slight 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 substantial.

1069. 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. The planning considerations of this application are finely balanced and in this, case the collective package of the public benefits secured, would on balance outweigh the heritage harms identified to the designated heritage assets some of which are of the highest calibre, thus complying with paragraph 202 of the NPPF.

Planning Obligations and Community Infrastructure Levy

CIL and Planning Obligations

1070. 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.

1071. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

1072. 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).

1073. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£16,256,504.00	£15,606,244.00	£650,260.00

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)		Available for allocation	Retained for administration and monitoring
City CIL	£7,320,150.00		£6,954,143.00	£366,008.00
City Planning Obligations				
Affordable Housing	£4,880,100.00		£4,831,299.00	£48,801.00
Local, Training, Skills and Job Brokerage	£2,928,060.00		£2,898,779.00	£29,281.00
Carbon Reduction Shortfall (<i>as designed</i>) <i>Not indexed</i>	£888,327.00		£888,327.00	£0
Security Measures Contribution (Eastern City Cluster)	£976,020.00		£966,260.00	£9,760.00
S106 Monitoring Charge	£6,250.00		£0	£6,250.00
Total liability in accordance with the City of London's policies	£16,998,907.00	£16,538,808.00	£460,099.00	

City's Planning Obligations

1074. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Highway Reparation and other Highways Obligations (Highways Schedule of Condition Survey, site access, consents, licences etc)
- Prior to the commencement of the S278 detailed design, details of the required highways impact mitigation works (forming part of the S278 scope of works) are required to be submitted for approval, including an updated Pedestrian Comfort Level analysis, Healthy Streets Assessment and a (1:200) general arrangement highways drawing, following consultation with the City of London and TfL.
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage (Demolition & Construction)
- Delivery and Servicing Management Plan (including consolidation and monitoring)
- Cycling Promotion Plan
- Vehicle Lift Maintenance and Management Strategy
- Construction Monitoring Cost (£53,820 for First Year of development and £46,460 for subsequent years)
- Carbon Offsetting
- 'Be Seen' Energy Performance Monitoring
- Utility Connection Requirements
- Section 278 Agreement (Transport for London)
- Public Lifts (maintenance and specification of internal lifts)
- Public Route
- Public Conservatory and Viewing Platform (Public Access & Management Plan)
 - *Free to access, to be open all year round (except Christmas Day, Boxing Day, New Year's Day) and during the hours of 10am to 7pm or nautical dusk whichever is the later*
- Public Realm (Management Plan)
- Television Interference Survey
- Wind Mitigation
- Solar Glare
- TfL Cycle Hire Contribution (£220,000)
- Cultural Implementation Strategy
- Co-working Space (details of specification, layout, facilities, operation and management)
- Affordable workspace
 - *25% of the floorspace at Level 4 to be provided as affordable workspace at 50% discount to market rent, equating to 50 desks*
- Cultural and Community Space (Public Access & Management Plan)

- *Securing public access to lower ground level and Levels 2 and 3*
- *Identification of cultural operator*
- St Paul's Cathedral External Lighting Project Contribution (£200,000)
- St Paul's Cathedral Golden Ball and Cross Contribution (£250,000)
- TfL highway improvements contribution (£TBC)

1075. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.

1076. The scope of the s278 agreement may include, but is not limited to:
- Provision of a dropped kerb for the new service vehicle access to the proposed development.
 - Removal of the existing vehicle crossover which provides vehicle access for the existing building, and reinstatement of the footway in this location.
 - Footway enhancements along Bishopsgate, including widening and re-surfacing the footway
 - Relocation of controlled pedestrian crossing adjacent to the site
 - Public realm works

Monitoring and Administrative Costs

1077. 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.

1078. 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.

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

1079. 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.

1080. 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 the 2no. disabled person's parking spaces in the basement are acceptable, and the provision of accessible floorspace and publicly accessible viewing platform and 'conservatory' garden would advance equality of opportunity

Human Rights Act 1998

1081. 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")).
1082. 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 2040. 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.
1083. 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

1084. 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.

1085. 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.
1086. The proposed development comprises the demolition of the existing building on site and its replacement with an office-led tower incorporating high quality flexible public realm at ground level, cultural public spaces at lower ground, 2nd and 3rd floor and roof top conservatory garden with viewing terrace. The proposal 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 and maintaining the City's position as the world leading business centre.
1087. The site is within the Central Activities Zone and highly sustainable with excellent access to transport infrastructure and able to support active travel and maintain pedestrian comfort for a high number of future employees. The site is central to the City's growth modelling and would deliver 14% of the required commercial space to meet projected economic and employment growth demand until 2036. This quantity of floorspace would contribute to maintaining the City's position as the world's leading international financial and business centre.
1088. Over 103,000 sq.m of Grade E commercial floorspace, of which over 80,000 sq.m would be flexible, sustainable Grade A office floorspace suitable for circa 7,500 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.
1089. The site is considered to be appropriate for a tall building. The proposal draws support in terms of locational requirements for a tall building London Plan Policy D9 A, B and D, Local Plan Policy CS 14(1,2, 4), CS7 (1,2 4-7) Emerging City Plan S12 (1,3-6) S21 (1,3-8). There is some conflict with London Plan D9 C (1) (a and d), Local Plan CS 14 (3), CS 7(3) and Emerging City Plan S12 (2) and S21 (2) due to adverse visual indirect impacts on designated heritage assets and protected views.
1090. The proposal would draw some conflict with aspects of Local Plan design policies CS10(1), DM10.1, emerging City Plan Policy S8 (9), DE2 and London Plan Policy D3 (D;11). Overall, Officers consider the proposal strikes a balance between heritage impacts and optimising the use of strategic land, delivering best-in-class office space, and a multi-layered series of flexible

cultural uses whilst providing additional high quality public realm. 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

1091. The building would be designed to high sustainability standards, including an air quality positive approach to minimising emissions and exposure to harmful pollutants, an increase in local greening and ecological value, energy efficient, targeting BREEAM 'Outstanding' and adopting Circular Economy Principles and integrated urban greening.
1092. The elegantly tapered and distinctive architectural forms of the linked buildings with carefully integrated urban greening will make a significant beneficial contribution to the appearance of the City Cluster in skyline and local views. The scheme delivers an increased and significant enhancement of public realm through the opening of the ground floor, creating a route through the site, opening to Bishopsgate. The scheme will allow for greater connectivity with the emerging Cluster in the future, including a potential connection into the Tower 42 Estate to the west with the introduction of a large permeable ground floor, open to the public 24 hours a day.
1093. The existing development will provide inclusive, inviting, and animated spaces, with extensive urban greening creating a new and much needed public open space in the heart of the City Cluster for people to pass through or linger.
1094. Working with the NLA as a potential or other content partner, the development will deliver a highly significant cultural asset to the City of London which will have a curated narrative through all three public experiences from ground to roof top. This will support the aspirations of the Eastern Cluster BID and Destination City to increase footfall and become a 7 day a week inclusive destination.
1095. 1,435 long term bicycle spaces would be provided with associated shower and locker facilities and 122 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 lifts within the building, the lids of which during the daytime would form part of the publicly accessible area and would be accessed via Bishopsgate.
1096. The proposal would not harm the attributes or components of the Outstanding Universal Value, Significance, authenticity and integrity of the Tower of London World Heritage Site, in accordance with Local Plan Policy CS12,

CS13 (3) Emerging City Plan Policy S11, HE1, HE3 London Plan Policy HC2 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG.

1097. In particular views from the southwest, the development would pull the central apex of very tall buildings closer to the Cathedral, impinging on the integral sky gap between it and the Cluster, somewhat diminishing its pre-eminence. The proposal would fail to preserve the characteristics and composition of River Prospect LVMF 15B and to a lesser extent LVMF 17 B, being prominent to the detriment of the views, whilst diminishing the viewers ability to recognise and appreciate the Strategically Important Landmark. The proposal would also fail to preserve the characteristics and composition of the Townscape View 26A, including of those of landmark elements, being prominent to the detriment of the view. Thus, it would not accord with London Plan Policy HC4, Local Plan Policy CS13 and emerging City Plan 2040 Policy S13 and associated guidance in the LVMF SPG and Protected Views SPD.
1098. In other LVMF pan-London panoramas and some local views from the London Boroughs of Southwark and Lambeth, Officers conclude the development would consolidate and enhance the visual appearance of the City Cluster on the skyline.
1099. The development would preserve the experiences from public high-level viewing platforms including from Monument, St Paul's Cathedral Stone Gallery and Golden Gallery and existing and emerging roof terraces which are also important to the character of the City of London.
1100. Overall, the proposal would draw conflict with Local Plan Policies CS12, DM 12.1, 12.5, CS13 (1 and 2) draft City Plan policies S11 and, HE1 London Plan HC1, and with the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies.
1101. The proposal would fail to preserve the significance/special interest or setting of the following designated heritage assets and would result in the following levels of harm:
- Low levels of less than substantial harm have been found to the setting and significance of Whitehall Court (II*), War Office/Ministry of Defence (grade II*), and Horse guards (grade I);
 - Low level of less than substantial harm to St Paul's Cathedral;
 - Low level of less than substantial harm to 52-68 Bishopsgate (Grade II);
 - Slight levels of less than substantial harm to St Helen's Place Conservation Area and St James's Park (Grade I RPG)
1102. The proposal would preserve the significance of Liverpool Street Arcade as a non-designated heritage asset. Officers consider 55 Bishopsgate has limited

architectural and historic values and does not meet the criteria to warrant non-designated heritage asset status.

1103. The proposal would preserve the special interest/significance and setting of the listed buildings at the Tower of London, Leadenhall Market, The Monument, 7-9 Gracechurch Street, Cannon Street Station Towers, Former Port of London Authority Building, St Botolph Bishopsgate, The Guildhall, St Mary Aldermanbury, St Lawrence Jewry, St Augustine, St Giles Cripplegate, Tower Bridge, Royal Exchange, 37-38 Threadneedle Street, 46-48 Bishopsgate, National Bank Lothbury, 12 -14 Austin Friars, 23 Austin Friars, 13 Bishopsgate, 3-5 Bishopsgate (Royal Bank of Scotland) 7-9 Bishopsgate and 39 Threadneedle Street, Guildhall Church of St Ethelburga, Church of St Helen, City of London Club, Liverpool Street Station, Great Eastern Hotel. It is considered the significance of the Bank, Guildhall, New Broad Street, Bishopsgate, Finsbury Circus, Leadenhall Market, Bunhill and Finsbury Square Conservation Areas would be unharmed.
1104. It is the view of officers that it is 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 is complied with and as policies relating to office floor space delivery, City Eastern Cluster and public realm would be complied with that notwithstanding the conflict with: Local Plan Policies DM10.1 (New Development) CS7 (Eastern Cluster), CS12 (Historic Environment) , DM12.1 Managing Change affecting all heritage assets and spaces), DM12.5 (Historic Parks and Gardens) CS13 (Protected Views) CS14 (Tall Buildings); Emerging City Plan Policies S11 (Historic Environment), HE1 (Managing Change to Heritage Assets) , S12 (Tall Buildings), S13 (Protected Views); S21 (City Cluster), London Plan D9 (Tall Buildings – Visual Impacts) , HC1 (Heritage Conservation and Growth), HC4 (LVMF); GLA's London Views Management Framework SPG and City of London's Protected Views SPD. the proposals comply with the development plan when considered as a whole.
1105. 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.
1106. 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.

1107. In this case, which is finely balanced, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, that as the proposals make will make a significant contribution to advancing the strategic business objectives of the City and comply with relevant design, eastern cluster and public realm policies.
1108. 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.
1109. 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).
1110. 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.
1111. National Planning Guidance advises that conflict between development plan policies adopted at the same time must be considered in the light of all material considerations including local priorities and needs as guided by the NPPF.
1112. 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

Internal consultations:

Memo, Lead Local Flood Authority, 18 November 2022 and 16 June 2023.
Memo, Paul Jones, 7 November 2022.
Memo, District Surveyors Office, 9 November 2022.
Memo, Environmental Resilience Officer, 1 December 2022.
Memo, Environmental Health Officer, 15 December 2022.
Memo, Access Advisor, 13 January 2023.
Memo, Planning Obligations Officer, 24 March 2023, 23 June 2023 and 4 July 2023.
Memo, Air Quality Officer, 26 June 2023.

External consultations:

Letter, Surveyor to the Fabric of St Paul's Cathedral, 23 December 2022 and 4 July 2023.
Email, Heathrow Airport, 7 November 2022.
Email, River Thames Society, 7 November 2022.
Email, NATS, 8 November 2022 and 16 June 2023.
Email, Department of Levelling Up, Housing and Communities, 9 November 2022.
Letter, Transport for London Crossrail Safeguarding, 10 November 2022 and 16 June 2023.
Letter, Twentieth Century Society, 14 November 2022 and email, 3 July 2023.
Letter, Historic England (Archaeology), 15 November 2022.
Letter, Historic England, 29 November 2022.
Email, Thames Water, 18 November 2022.
Letter, London City Airport, 21 November 2022 and 19 June 2023.
Letter, Natural England, 21 November 2022 and email, 28 June 2023.
Letter, City of Westminster, 21 November 2022, 31 March 2023 and 27 June 2023.
Letter, Environment Agency, 1 December 2022 and 23 June 2023.
Letter, LB Camden, 20 January 2023.
Letter, Greater London Authority (Or Mayor of London?), 23 January 2023.
Letter, LB Islington, 18 May 2023.
Email, Health and Safety Executive, 15 June 2023.
Email, Historic Royal Palaces, 15 June 2023.
Letter, Heathrow Airport, 19 June 2023.
Letter, LB Tower Hamlets, 27 June 2023.
Letter, TfL, 5 July 2023

Objection:

Eversheds Sutherland International LLP on behalf of The Wardens and Society of the Mystery or Art of the Leathersellers of the City of London, 25 November 2022.
John Robertson of John Robertson Architects, 1 December 2022.
Max Skjoldebrand, 1 December 2022.
Judy Robertson, 3 December 2022.
Mr Philippos Tsirigotis, 16 June 2023.

Support:

Mr James Smith, 21 November 2022.
Mr Amar T, 21 November 2022.
Ivan Arenas Martinez, 23 December 2022.
Mr Otis Reed, 24 December 2022.

Fabien S., 5 January 2023.
Mr Steven Jacobs, 8 January 2023.

Other:

Email re: validation, DP9, 28 October 2022.
Email re: Whole Life Carbon Response, DP9, 5 June 2023.

Application papers:

Application Form, DP9, 11 October 2022.
CIL Form, 7 October 2022.
Cover letter, DP9, 17 October 2022 and 2 June 2023.
Aviation Safeguarding Assessment, K L Grant Consulting Ltd, October 2022.
Biodiversity Net Gain Assessment, Schofield Lothian, October 2022.
Circular Economy Statement P04, Arup, October 2022.
Design and Access Statement, Arney Fender Katsalidis, October 2022.
Design and Access Statement Landscape Addendum, Townshend Landscape Architects, June 2023.
Draft Construction Environmental Management Plan, Multiplex, October 2022.
Drainage Strategy, Robert Bird Group, October 2022.
Economic Benefits Statement, Hatch, October 2022.
Economic Benefits Statement Addendum, Hatch, May 2023.
Environmental Statement, Trium, October 2022.
Environmental Statement Non-Technical Summary, Trium, October 2022.
Fire Statement, Warrington Fire, October 2022.
Flood Risk Assessment, Hilson Moran, October 2022.
Geoenvironmental Risk Assessment (Phase 1), Hilson Moran, October 2022.
GLA Circular Economy Spreadsheet, 28 October 2022.
GLA Whole Life Carbon Spreadsheet, 28 October 2022.
Health Impact Assessment, Hatch, October 2022.
Health Impact Assessment Addendum, Hatch, June 2023.
Landscape and Public Realm Design and Access Statement, Townshend Landscape Architects, October 2022.
Planning Statement, DP9, October 2022.
Preliminary Ecological Appraisal, Schofield Lothian, October 2022.
Social Value, Culture and Community Plan, Hatch, October 2022.
Statement of Community Involvement, Redwood Consulting, October 2022.
Structural Engineering Concept, Robert Bird Group, October 2022.
Sustainable Development and Climate Change Report (including Energy Statement), Hilson Moran, October 2022.
Transport Assessment, SWECO, October 2022.
Transport Assessment Addendum 2, SWECO, 8 June 2023.
Thermal Comfort Report, Wirth Research, October 2022.
Utilities Statement, Hilson Moran, October 2022.
Pedestrian Movement Forecast, Space Syntax, May 2023.
Pedestrian Movement Forecast Addendum, Space Syntax, June 2023.
Ventilation/Extraction Statement, Hilson Moran, October 2022.
Whole-Life Carbon Assessment, Arup, October 2022.
Equality Statement, Trium, November 2022.
ES HTVIA Addendum, Montagu Evans, June 2023.
ES Addendum Report, Trium, June 2023.

Environmental Statement Addendum Revised Non-Technical Summary, Trium, June 2023.

Building Services Engineering for Planning, Hilson Moran, May 2023.

Cultural Plan, Hatch, June 2023.

Ground Floor Changes Test (as of 19/05/2023 Wind CFD, Wirth Research, May 2023.

Opportunities and Constraints of Development Options, 30 May 2023.

Whole Lifecycle Carbon Optioneering PAN (City of London) – Dashboard, Extracted from ARUP-RP-S-0004_Detailed Circular Economy Statement_P04 – Updated 25/04/2023.

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:
 - 103,073 sq.m (GIA) of commercial floorspace (Class E);

- 17,640 sq.m (GIA) of plant, BMU, and ancillary space associated with the commercial floorspace including bike storage, parking, lockers, and showers (Class E);
- 2545 sq.m (GIA) of multi-purpose publicly accessible space part Level 02 & Level 03 (sui generis); and
- 1773 sq.m (GIA) of conservatory and viewing platform roof top amenity space, including lower ground conservatory lobby (sui generis).
- 58 sq.m. (GIA) flexible retail use

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 Vehicle Lift Maintenance and Management 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 (May 2021);
 - 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

- 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.

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

DM21.3 Residential environment

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

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

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

3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.

4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.

5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

SCHEDULE

APPLICATION: 22/00981/FULEIA

55 Bishopsgate London EC2N 3AS

Demolition of the existing building and the erection of a part-63 storey (284.68 AOD) and part-22 storey (112.30 AOD) building plus basement, including office use (Class E); a publicly accessible multi-purpose space at ground floor level, part Level 02 and part Level 03 for a flexible use including: retail, food and beverage, drinking establishment, learning, community use, exhibition and/or performance space (Sui Generis); a public viewing gallery (Sui Generis), public realm improvements, cycle parking, servicing, vehicle lifts, refuse facilities and other works associated with the development including access and highways works. (RECONSULTATION DUE TO DESIGN AMENDMENTS AND SUBMISSION OF ADDITIONAL INFORMATION)

(The proposal would provide 126,854sq.m GEA of Class E offices, lobby, plant, BMU and ancillary space; and 4,702sq.m GEA of sui generis publicly accessible space including a public viewing gallery, level 02, level 03 and LG including viewing gallery lobby; total floorspace 131,556sq.m GEA; overall height 284.68 AOD.)

The application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details contact hello@triumenv.co.uk or Tel: +44 (0) 203 887 7118.

CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 (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, including details of deconstruction material reuse sourced from site and from market places as set out in the submitted Circular Economy Statement, 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 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 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 Before any works including demolition are begun a site survey and a condition survey of highway and other land at the perimeter of the site shall be carried out. 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 (including the threshold levels at the highways boundary) 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.

- 5 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.
- 6 No construction, excluding any demolition and ground preparation works shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.
REASON: In the interests of aircraft safety and the operations of NATS En-route PLC
- 7 No construction work shall be carried out above 126m above ordnance datum (AOD) unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.
REASON: In the interests of aircraft safety and the operations of NATS En-route PLC.
- 8 No cranes, excluding those required for demolition and ground preparation works and operating below 126m AOD, shall be erected on site until a construction methodology including details of the use of cranes in relation to location, maximum operating height of crane and start/finish dates during the development has been submitted to and approved by the local planning authority (in consultation with NATS and London City Airport). The development shall thereafter be carried out in accordance with the approved construction methodology and no cranes shall operate at a height greater than 309.6m AOD.
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 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.

- 11 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.

- 12 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.
- 13 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.
- 14 No development other than 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.

- 15 Unless otherwise agreed in writing with the Local Planning Authority, no geotechnical site investigation shall be carried out before a timetable and scheme of archaeological monitoring has been submitted to and approved in writing by the Local Planning Authority. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

- 16 No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works. If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. Where appropriate, details of a programme for delivering related positive public benefits

C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

- 17 Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

- 18 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.
- 19 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.
- 20 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices (hydrobrake), design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to

no greater than 1.94 l/s from, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 240m³;

(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.

- 21 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.

- 22 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.

- 23 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.

- 24 Before any construction works hereby permitted are begun a report providing details of the design for deconstruction of the façade system, to enable easy maintenance, replacement in component parts and end of life reuse at high value, shall be submitted to and approved in writing by the local planning authority.
REASON: To ensure whole life-cycle carbon emissions are further reduced and waste minimised in compliance with Policy SI 2 and SI 7 of the London Plan.
- 25 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) particulars and sample 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;
 - (b) details of the proposed new external and semi- external facades including details of a typical bay detail the development for each façade including jointing where appropriate;
 - (c) mock up sample of the glazing system to test solar glare
 - (d) details of the rooftop including any plant equipment and the roofscape;
 - (e) details of ground and first floor elevations including all entrances, lifts, escalators, façade materials, columns and the digital screen;
 - (f) full details of the of the ground floor public spaces, including flooring, entrances, fenestration, planters, seating, lighting, soffits, drainage, irrigation, vehicle lifts, roller shutters and any infrastructure required to deliver programmed and varied uses;
 - (g) full details of the western garden space, including all elevations, surface treatments, planters, seating, lighting, soffits, the water feature, drainage, irrigation and any infrastructure required to deliver programming and varied uses;
 - (h) details of soffits, hand rails and balustrades;
 - (i) details of the retail kiosks, including any infrastructure required;
 - (j) details of the drinking fountain;
 - (k) details all party wall treatments;
 - (l) 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;
 - (m) details of all drainage, irrigation and rainwater harvesting;
 - (n) details of the integration of M&E and building services into the external envelope;
 - (o) details of canopies; and
 - (p) typical of any masonry details, including jointing and any necessary expansion/movement joints.

- (q) details of the supporting columns including the interface at ground level
- (r) details of the escalators and entrances into the office lobby
- (s) details of all proposed entrances including lifts
- (t) details of roof top terrace platform

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.

- 26 Before any works thereby affected are begun, details of all balustrades to external viewing platform area and associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life 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: DM3.2, DMI0.1, DMI0.5, DM12.2.
- 27 Before any works thereby affected are begun, further details of all the proposed green walls shall be provided which shall include full details of the proposed irrigation and additional work to demonstrate the fire safety of the green walls shall be submitted to and approved in writing with the local planning authority, in consultation with the Greater London Authority and London Fire Brigade
REASON: To ensure that the development incorporates the necessary fire safety measures.
- 28 Before the works thereby affected are begun, mock up 1:1 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.
- 29 All unbuilt surfaces, including the ground floor and landscaping, 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: DM10.1, DM19.2.

- 30 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 green walls, 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.

- 31 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.

- 32 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;
- details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering.
- details of aviation lights including locations

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

- 33 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.
- 34 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.
- 35 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

- 36 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.
- 37 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.
- 38 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.
- 39 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.
- 40 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/kiosks within the development shall be submitted;

(b) A Signage strategy relating to the free public viewing gallery and platform space 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

All signage relating to the public viewing gallery, platform area and cultural space (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.

- 41 Prior to the occupation of the building, the applicant is required to submit to the Local Planning Authority for approval of a wayfinding strategy. The developer is to consider the implementation or removal of legible London signage within the site and surrounding locations. The extent of the works should be agreed with TFL, prior to submission.

REASON: In the interests of visual amenity and satisfactory pedestrian circulation of the site, in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

- 42 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 S11 and SD4 D.

- 43 Before the use as authorised by this permission is commenced, adequate provision must be made within the curtilage of the site for loading and unloading facilities and details of such facilities must be submitted to and approved in writing by the Local Planning Authority. The approved facilities must be maintained and used as approved for the life of the building.
- REASON: To ensure that traffic in surrounding streets is not impeded and a free flow of traffic is maintained in accordance with the following policy of the Local Plan: DM16.5.

- 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.
REASONS: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.
- 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 1,435 long stay pedal cycle spaces, and a minimum of 122 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 134 showers and 1,482 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 levels 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 other than between the hours of 22:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 - 07:00 on Sunday evenings. 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 1900

- 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: DMI0.1.

- 66 The roof terrace hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 67 No amplified or other music shall be played on the roof terrace.
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 Unless otherwise approved by the Local Planning Authority the doors and windows to any bar or restaurant on all frontages shall be kept closed. The doors may be used only in an emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 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 The development shall be carried out in accordance with the approved details within the Fire Strategy. Document titled: 55 Bishopsgate Fire Statement dated October 2022 by Warrington Fire.
REASON: To ensure that the development incorporates the necessary fire safety measures.
- 72 The areas shown on the approved drawings as Offices, Multipurpose Publicly Accessible Space and Conservatory and Viewing Terrace, and as set out in Condition 73 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.

- 73 The development shall provide (all figures GIA and excluding plant):
- 103,073 sq.m Office Use (Class E);
 - 58 sq.m Retail kiosks (Class E);
 - 2,545 sq.m Multipurpose Publicly Accessible Space (Sui Generis); and
 - 1,773 sq.m Conservatory and Viewing Terrace (Sui Generis).

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

- 74 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:

55BG-AFK-XX-B4-DR-AR-09495 REV P03,
55BG-AFK-XX-B3-DR-AR-09496 REV P03,
55BG-AFK-XX-B2-DR-AR-09497 REV P03,
55BG-AFK-XX-B1-DR-AR-09498 REV P03,
55BG-AFK-XX-LG-DR-AR-09499 REV P03,
55BG-AFK-XX-00-DR-AR-09500 REV P03,
55BG-AFK-XX-01-DR-AR-09501 REV P03,
55BG-AFK-XX-02-DR-AR-09502 REV P03,
55BG-AFK-XX-03-DR-AR-09503 REV P03,
55BG-AFK-XX-04-DR-AR-09504 REV P03,
55BG-AFK-XX-05-DR-AR-09505 REV P03,
55BG-AFK-XX-06-DR-AR-09506 REV P03,
55BG-AFK-XX-07-DR-AR-09507 REV P03,
55BG-AFK-XX-08-DR-AR-09508 REV P03,
55BG-AFK-XX-09-DR-AR-09509 REV P03,
55BG-AFK-XX-10-DR-AR-09510 REV P03,
55BG-AFK-XX-11-DR-AR-09511 REV P03,
55BG-AFK-XX-12-DR-AR-09512 REV P03,
55BG-AFK-XX-13-DR-AR-09513 REV P03,
55BG-AFK-XX-14-DR-AR-09514 REV P03,
55BG-AFK-XX-15-DR-AR-09515 REV P03,
55BG-AFK-XX-16-DR-AR-09516 REV P03,
55BG-AFK-XX-17-DR-AR-09517 REV P03,
55BG-AFK-XX-18-DR-AR-09518 REV P03,
55BG-AFK-XX-19-DR-AR-09519 REV P03,
55BG-AFK-XX-20-DR-AR-09520 REV P03,
55BG-AFK-XX-21-DR-AR-09521 REV P03,
55BG-AFK-XX-22-DR-AR-09522 REV P03,
55BG-AFK-XX-23-DR-AR-09523 REV P03,
55BG-AFK-XX-24-DR-AR-09524 REV P03,
55BG-AFK-XX-25-DR-AR-09525 REV P03,
55BG-AFK-XX-26-DR-AR-09526 REV P03,
55BG-AFK-XX-27-DR-AR-09527 REV P03,
55BG-AFK-XX-28-DR-AR-09528 REV P03,
55BG-AFK-XX-29-DR-AR-09529 REV P03,

55BG-AFK-XX-30-DR-AR-09530 REV P03,
55BG-AFK-XX-31-DR-AR-09531 REV P03,
55BG-AFK-XX-32-DR-AR-09532 REV P03,
55BG-AFK-XX-33-DR-AR-09533 REV P03,
55BG-AFK-XX-34-DR-AR-09534 REV P03,
55BG-AFK-XX-35-DR-AR-09535 REV P03,
55BG-AFK-XX-36-DR-AR-09536 REV P03,
55BG-AFK-XX-37-DR-AR-09537 REV P03,
55BG-AFK-XX-38-DR-AR-09538 REV P03,
55BG-AFK-XX-39-DR-AR-09539 REV P03,
55BG-AFK-XX-40-DR-AR-09540 REV P03,
55BG-AFK-XX-41-DR-AR-09541 REV P03,
55BG-AFK-XX-42-DR-AR-09542 REV P03,
55BG-AFK-XX-43-DR-AR-09543 REV P03,
55BG-AFK-XX-44-DR-AR-09544 REV P03,
55BG-AFK-XX-45-DR-AR-09545 REV P03,
55BG-AFK-XX-46-DR-AR-09546 REV P03,
55BG-AFK-XX-47-DR-AR-09547 REV P03,
55BG-AFK-XX-48-DR-AR-09548 REV P03,
55BG-AFK-XX-49-DR-AR-09549 REV P03,
55BG-AFK-XX-50-DR-AR-09550 REV P03,
55BG-AFK-XX-51-DR-AR-09551 REV P03,
55BG-AFK-XX-52-DR-AR-09552 REV P03,
55BG-AFK-XX-53-DR-AR-09553 REV P03,
55BG-AFK-XX-54-DR-AR-09554 REV P03,
55BG-AFK-XX-55-DR-AR-09555 REV P03,
55BG-AFK-XX-56-DR-AR-09556 REV P03,
55BG-AFK-XX-57-DR-AR-09557 REV P03,
55BG-AFK-XX-58-DR-AR-09558 REV P03,
55BG-AFK-XX-59-DR-AR-09559 REV P03,
55BG-AFK-XX-60-DR-AR-09560 REV P03,
55BG-AFK-XX-61-DR-AR-09561 REV P03,
55BG-AFK-XX-62-DR-AR-09562 REV P03,
55BG-AFK-XX-63-DR-AR-09563 REV P03,
55BG-AFK-XX-64-DR-AR-09564 REV P03,
55BG-AFK-XX-XX-DR-AR-09600 REV P03,
55BG-AFK-XX-XX-DR-AR-09601 REV P03,
55BG-AFK-XX-XX-DR-AR-09602 REV P03,
55BG-AFK-XX-XX-DR-AR-09603 REV P03,
55BG-AFK-XX-XX-DR-AR-09700 REV P03,
55BG-AFK-XX-XX-DR-AR-09701 REV P03,
55BG-AFK-XX-XX-DR-AR-09702 REV P03,
55BG-AFK-XX-XX-DR-AR-09703 REV P03,
55BG-AFK-XX-XX-DR-AR-09704 REV P03,
55BG-AFK-XX-XX-DR-AR-09710 REV P03,
55BG-AFK-XX-XX-DR-AR-09711 REV P03,
55BG-AFK-XX-XX-DR-AR-09713 REV P03,
55BG-AFK-XX-XX-DR-AR-09714 REV P03,
55BG-AFK-XX-XX-DR-AR-09715 REV P03,
55BG-AFK-XX-XX-DR-AR-09716 REV P03,

55BG-AFK-XX-XX-DR-AR-09717 REV P03,
55BG-AFK-XX-XX-DR-AR-09727 REV P03,
55BG-AFK-XX-00-DR-AR-09728 REV P03,
55BG-AFK-XX-00-DR-AR-09729 REV P03,
55BG-AFK-XX-00-DR-AR-09730 REV P03,
55BG-AFK-XX-B1-DR-AR-09731 REV P03,
55BG-AFK-XX-XX-DR-AR-09740 REV P03,
55BG-AFK-XX-XX-DR-AR-09741 REV P03,
55BG-AFK-XX-00-DR-AR-09750 REV P03,
55BG-AFK-XX-XX-DR-AR-09800 REV P03,
55BG-AFK-XX-XX-DR-AR-09801 REV P03,
55BG-AFK-XX-XX-DR-AR-09802 REV P03,
55BG-AFK-XX-XX-DR-AR-09803 REV P03,
55BG-AFK-XX-XX-DR-AR-09804 REV P03; and
55BG-AFK-XX-XX-DR-AR-09805 REV P03.

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

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.