

|  |                                      |
|--|--------------------------------------|
| <b>Committee:</b>  | <b>Date:</b>                         |
| Planning Application Sub-Committee   | 20 November 2023                     |
| <b>Subject:</b><br>55 And 65 Old Broad Street London EC2M 1RX<br>Partial demolition of existing buildings and the redevelopment of the site comprising the construction of a new building comprising ground floor plus 23 upper storeys plus 2 existing basement levels (55 Old Broad Street) for the provision of office space (Class E(g)), flexible retail / cafe (Class E(a)(b)), retention of ground floor plus 5 storey building (65 Old Broad Street) for the provision of maker / studio (Class E(g)), flexible retail / cafe / maker / studio (Class E(a)(b)(g)), flexible maker / studio / office (Class E(g)), renovation of Grade II Listed Bath House building for the provision of cultural / event uses (Sui Generis), provision of public house (Sui Generis) and improvements to public realm and routes, ancillary basement cycle parking, servicing and plant, highway improvements and other works associated with the proposed development. | <b>Public</b>                        |
| <b>Ward:</b> Bishopsgate   | <b>For Decision</b>                  |
| <b>Registered No:</b> 23/00469/FULEIA & 23/00966/LBC   | <b>Registered on:</b><br>15 May 2023 |
| <b>Conservation Area:</b> Bishopsgate  | <b>Listed Building:</b> Yes          |

## Summary

Planning Permission (23/00469/FULEIA) is sought for:

Partial demolition of existing buildings and the redevelopment of the site comprising the construction of a new building comprising ground floor plus 23 upper storeys plus 2 existing basement levels (55 Old Broad Street) for the provision of office space (Class E(g)), flexible retail / cafe (Class E(a)(b)), retention of ground floor plus 5 storey building (65 Old Broad Street) for the provision of maker / studio (Class E(g)), flexible retail / cafe / maker / studio (Class E(a)(b)(g)), flexible maker / studio / office (Class E(g)), renovation of Grade II Listed Bath House building for the provision of cultural / event uses (Sui Generis), provision of public house (Sui Generis) and improvements to public realm and routes, ancillary basement cycle parking, servicing and plant, highway improvements and other works associated with the proposed development.

Listed Building Consent (23/00966/LBC) is sought for:

Refurbishment of the Bath House involving demolition of hard landscape slab and of 20th Century sections of the building above ground; ground floor extension to provide elevator shaft and cafe kiosk; external restoration, decoration and alteration including new accesses into the building; internal restoration, decoration and alteration including works to accommodate elevator shaft; new hard and soft landscaping including green roof and basement skylights; and exploratory works at basement level to facilitate further restoration activity.

An Environmental Statement accompanies the scheme.

The scheme is of a high-quality design and features a number of attractive features including the refurbishment of the Grade II Listed Bath House to be publicly accessible, the refurbishment of 65 Old Broad Street, event/cultural space, planting to create a 'green ribbon' of vegetation across the new proposed building at 55 Old Broad Street and a significant increase in office floorspace meeting one of the primary objectives of the City's Local Plan and London Plan policies.

The proposed development has been designed to incorporate the needs for sustainability with careful consideration given to how the wider scheme has retained and refurbished 65 Old Broad Street and enhanced the appeal of

Grade II Listed Bath House on Site while providing significant biodiversity enhancements and urban greening.

The new building would be designed to high quality and sustainability standards, incorporating significant elements of climate resilience, urban greening, energy efficiency, targeting BREEAM 'Outstanding' and a 5 star NABERS UK rating, as well as adopting detailed circular economy principles.

The scheme will deliver exemplar energy and sustainability credentials, including an 0.43 Urban Greening Factor exceeding the target score of 0.30.

The scheme provides a varied range of retail spaces including retail/café floorspace at the ground floor of 55 Old Broad Street in the 'glass house' and in the adjacent Visitor Cycle Pod and retail/café/maker/studio floorspace at the ground floor of 65 Old Broad Street.

The proposed development would provide cultural/event floor space at Level 2 of 65 Old Broad Street and at the Bath House in the basement areas. The existing Grade II Listed Bath House is proposed to be retained and refurbished as a cultural/events space with greater opportunity for public uses free of charge for local community groups, schools, cultural / arts groups and charities for uses including gallery / exhibitions, showcasing of maker / studio space work, and education visits / events.

The proposed scheme would provide 33,078sqm of flexible and sustainable office floorspace suitable for circa 1,960 to 2,625 City workers along with 668sqm of office/maker/studio floorspace at Level 3 and 4 of 65 Old Broad Street.

The scheme delivers an increased and significant enhancement of public realm through the introduction of two new north-south pedestrian routes through the site and a number of above ground amenity spaces through the delivery of terraces including 2 larger terraces on Level 19 and 20 at 55 Old Broad Street and at Level 2 at 65 Old Broad Street.

583 long stay cycling parking spaces (of which 471 spaces will be located within the basement and 112 spaces within the Visitor Cycle Pod) and 92 short stay cycle space (of which 72 spaces will be located in the Visitor Cycle Pod and 20 spaces in externally). The scheme is in compliance with Local Plan Policy 16.3 and London Plan policy 6.9.

Representations objecting to the proposals have been received from Historic England, The Victorian Society, The Georgian Group, Historic Buildings and Places, The Twentieth Century Society, The Surveyor to the Fabric of St Paul's Cathedral and SAVE (Britain's Heritage).

Historic England welcome the repair and reuse of the Listed Bath House provided this would provide a meaningful heritage benefit. Historic England are also content with the proposed interventions to the listed building including the glazed link. However, Historic England do not support the demolition of the surviving parts of New Broad Street, given the harm this would cause.

The Victorian Society object to the construction of the proposed 23-storey building in this location, which would cause unwarranted and significant harm to the setting of the Grade II listed former Turkish Bath House and less than substantial harm to the New Broad Street and Bishopsgate Conservation areas.

The Georgian Group consider that due to the height and massing the proposals would cause an element of less than substantial harm to the significance of heritage assets including St Botolph's Church, All Hallows-on-the-wall (Church of All Hallows) and St Paul's Cathedral.

Historic Buildings and Places generally welcome the repair of the Bath House and introduction of a new long-term, more accessible use for this heritage asset. However, they have concerns with the impact of the proposed tower development on the setting of the ground level entry pavilion.

The Twentieth Century Society consider that the link bridge over Wormwood Street should be identified as a Non-Designated Heritage Asset and object due to the loss of the walkway.

The Surveyor to the Fabric of St Paul's Cathedral object to the scheme and consider that it would worsen an already (and widely acknowledged) harmful element of the setting of the cathedral (Nido Tower). They consider that the proposals would also cause an erosion to the skygap that is crucial to the City's skyline, key views, and the significance of the Grade I listed Cathedral. They consider that this erosion would be visible from a strategic view 15B.1 and therefore contrary to LVMF guidance.

SAVE Britain's Heritage object to the above planning application for 55 and 65 Old Broad Street on the grounds that this proposal would cause substantial harm to the Grade II listed former bath house (8 Bishopsgate Churchyard) within the application site, and less than substantial harm to the setting of several surrounding listed buildings.

A total of 352 further letters of objection have been received objecting to the works to the Grade II Listed Bath House and impacts to the heritage asset, concerns for cantilever over heritage asset, overshadowing of the Bath House, impacts to surrounding Listed Buildings and heritage assets, impacts to neighbouring Conservation Areas, loss of open space, the overdevelopment of the site, impacts on natural daylight, noise impacts, pedestrian flows through the site, the design of the proposed scheme, the need for office space, sustainability and conflict with the National Planning Policy Framework (NPPF).

A total of 14 letters of support have been received stating that more spaces like 65 Old Broad Street (The Hive) are needed in the City.

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 5.7% 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 in London Plan Policy D9 A, B and D, Local Plan Policy CS14 (1, 2, 4), CS7 (1, 2, 4-7), draft City Plan 2036 S12 (1, 3, 6), S21 (1, 3, 8). There is some conflict with London Plan D9 C (1 (a), (d) and (h)), Local Plan CS14 (3), CS7 (3) and draft City Plan 2036 S12 (2) and S21 (2) due to adverse impacts on a single designated heritage asset and one LVMF view (15B.1). These conflicts are considered as part of the overall planning balance in the conclusion of the report.

The new building boasts a dynamic sculptural design, featuring two distinct elements of varying heights at 55 Old Broad Street. Green spaces have been integrated on Level 3-23 of 55 Old Broad Street where there would be access to greened external terrace spaces. In design terms this would appear as a continuous green ribbon of balconies, green roofs and planting that animate the appearance of the tall building. Multi-level terraces will be provided over levels

19 and 20. Level 19 will contain a planted roof terrace for communal use, with a Level 20 terrace for the use of the level's tenant occupier.

From LVMF Assessment Point 15B.1 (River Prospect, Waterloo Bridge (Downstream)), in the winter and summer views, the proposed new tall building at 55 Old Broad Street would be partially visible to the left of Angel Court and to the right of St. Paul's Cathedral. The proposed building would result in a very minor incursion into the Cathedral's clear sky setting and would therefore fail, to a slight degree, to preserve or enhance the Cathedral's relationship with its clear sky background, conflicting with the guidance at paragraph 264 of the LVMF SPG.

As such, the proposals would result in a slight level of harm to the setting of St Paul's Cathedral in LVMF 15B.1 although there would be no diminishment of its prominence or landmark quality with the view and the ability to recognise and appreciate St Paul's Cathedral as a Strategically Important Landmark would be preserved overall. The proposed development has been amended to mitigate this visual intrusion as far as possible through design amendments (through amendments to the rooftop balustrade). Nevertheless, the proposal would result in a slight degree of conflict with London Plan Policy HC4, Local Plan Policy CS13 (1 and 2), emerging City Plan 2040 Policy S13 and London Plan policy HC4, the LVMF SPG and the City of London Protected Views SPD.

Internal works to the Grade II Listed Bath House are presented in LPA Ref 23/00966/LBC and an assessment of the impacts to the fabric of the heritage asset is provided in this report below. In terms of external works to the Grade II Listed Bath House, the proposed development would preserve the special architectural and historic interest of the listed building and the contribution made by setting. The alterations would affect modern fabric and would lead to benign, positive change in the surroundings of the asset. In terms of internal works to restore the Grade II Listed Bath House, these would focus on removing modern fabric while respecting original features and spaces.

The significance and setting of many surrounding designated heritage assets including London Wall: Remains of Roman and medieval wall from West End, Church of St Botolph Bishopsgate (Grade II\*) and Church Hall (Grade II) and the Drinking Fountains, Overthrows and Lanterns (Grade II), Church of All Hallows (Grade I), Great Eastern Hotel (Grade II\*) would be preserved.

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

The proposals include the removal of a raised walkway over Wormwood Street attached to the existing building at 55 Old Broad Street. This raised walkway is part of a system of elevated walkways known as "pedways", constructed from the mid-1960s as part of the post-war redevelopment of the City of London, which had suffered extensive damage during World War II. Its removal is considered acceptable in design and heritage terms.

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.

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.

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

As set out in paragraph 199 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the conservation of a designated heritage asset (and the more important the asset, the greater the weight should be). St Paul's Cathedral is a Grade I listed building, 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.

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.

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 utmost heritage value.

Therefore, an evaluation of the public benefits and the weight afforded to them has been undertaken. 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 5.7 % 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 cultural/event spaces at the Bath House and at Level 2 of 65 Old Broad Street, public realm enhancements and contribution to the environmental enhancement of the areas are of low to moderate benefits. 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 and listed building consent be granted for the above proposal in accordance with the details set out in the attached schedule subject to:

(a) Planning obligations and other agreements being entered into under Section 106 of the Town and Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed.

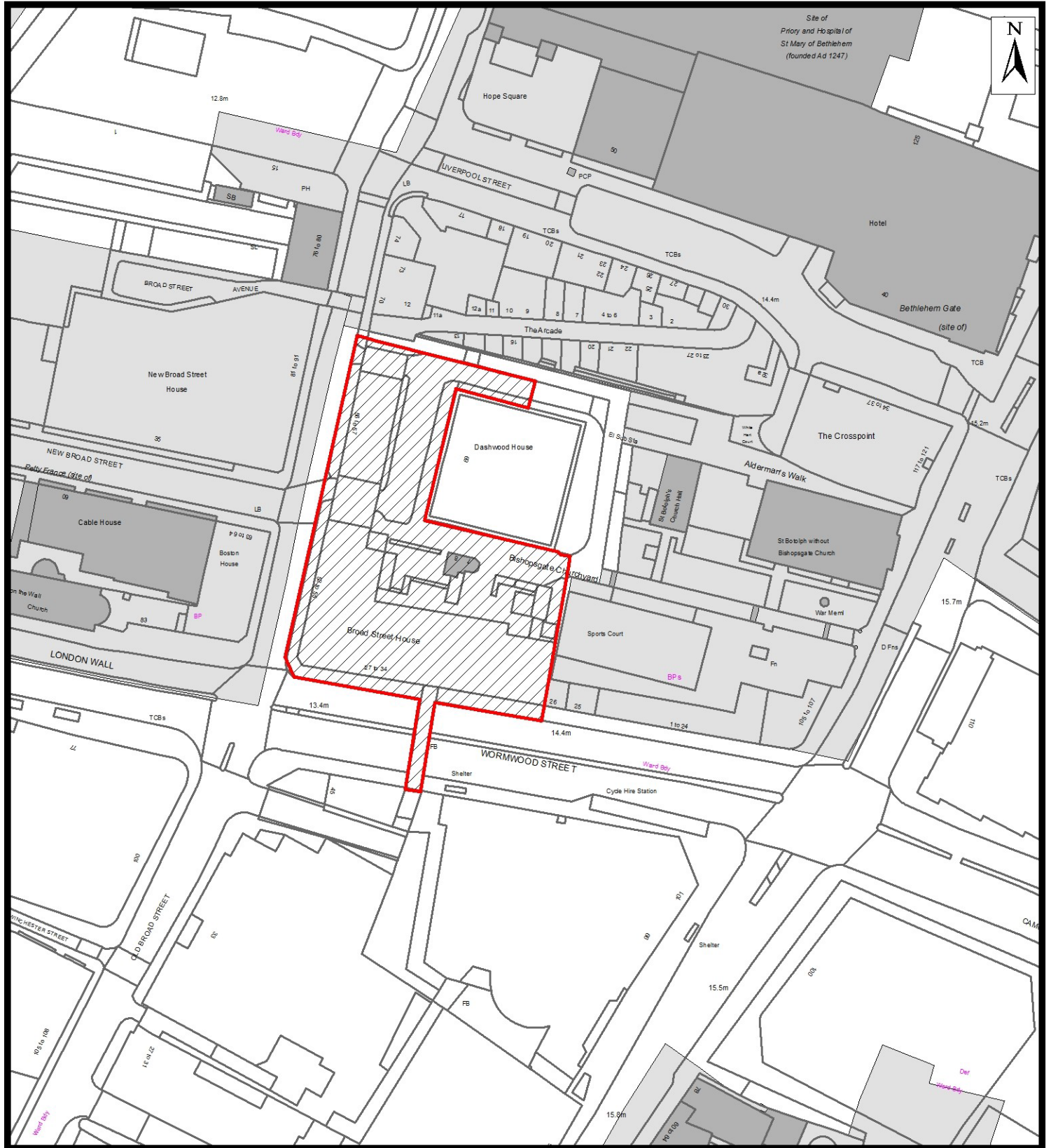
(2) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.

(3) That you agree in principle that the land affected by the building which is currently public highway and land over which the public have right of access may be stopped up to enable the development to proceed and, upon receipt of



the formal application, officers be instructed to proceed with arrangements for advertising and (subject to consideration of consultation responses) making of a Stopping-up Order for the area shown marked on the Stopping-up Plan annexed to this report under the delegation arrangements approved by the Court of Common Council.

# Site Location Plan



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ADDRESS:  
55 & 65 Old Broad Street

CASE No.  
23/00469/FULEIA

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



ENVIRONMENT DEPARTMENT



Figure 1 - View of 55 Old Broad Street facing north-east.



Figure 2 - View along Wormwood Street (including existing bridge link) facing east.

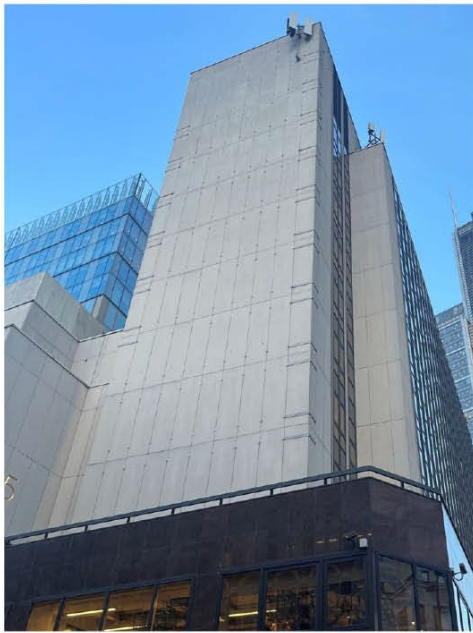


Figure 3 - View of 55 Old Broad Street on corner with Wormwood Street facing east.



Figure 4 - View of 55 Old Broad Street and the Bath House from rear of existing Public House facing west.





Figure 5 - View of 65 Old Broad Street, facing south



Figure 6 - View of 65 Old Broad Street, from Bishopgate Churchyard facing north-west.



Figure 7 - View of Bath House from Bishopgate Churchyard facing south.



Figure 8 - View of Bath House from existing rear entrance of Public House facing north-west.



Figure 9 - View of internal corner of 55 and 65 Old Broad Street from rear of Public House facing west.



Figure 10 - View of 55 Old Broad Street from Bishopsgate Churchyard facing east



Figure 11 - View of Bath House from Old Broad Street facing east.



Figure 12 - View of 55 Old Broad Street from Wormwood Street facing north-east.





Figure 13 - View of corner of Wormwood Street and Old Broad Street facing north.



Figure 14 - View of 55 Old Broad Street from Wormwood Street facing north.



Figure 15 - View of existing Public House on Wormwood Street facing north.



Figure 16 - View of 55 Old Broad Street from Wormwood Street facing north-west.

# APPLICATION COVER SHEET

55 and 65 Old Broad Street

| TOPIC                          | INFORMATION   |   |  |                                     |
|--------------------------------|---|---|--|-------------------------------------|
| 1. HEIGHT                      | EXISTING  |   | PROPOSED                                     |                                     |
|                                | 60.68 m AOD<br>Circa 47.20 m AGL  |   | 103.15 m AOD<br>Circa 89.15 m AGL            |                                     |
| 2. FLOORSPACE GIA (SQM)        | USES  | EXISTING sqm                                | PROPOSED                                     |                                     |
|                                | Office (E(g))   | 9215.1                                      | Office (E(g))                                | 33078.1                             |
|                                | Office / maker / studio (E(g))  | 0   | Office / maker / studio (E(g))               | 667.5                               |
|                                | Maker / studio (E(g))   | 0   | Maker / studio (E(g))                        | 242.8                               |
|                                | Retail shop/café (E(a)/(b))   | 1433  | Retail shop/café (E(a)/(b))                  | 124.7                               |
|                                | Retail / café / maker / studio (E(a)/(b)(g))                              | 0   | Retail / café / maker / studio (E(a)/(b)(g)) | 111.8                               |
|                                | Cultural / event (Sui Generis)  | 0   | Cultural / event (Sui Generis)               | 351.2                               |
|                                | Bank (E)  | 582.1                                       | Bank (E)                                     | 0                                   |
|                                | Betting shop (Sui Generis)  | 102.2                                       | Betting shop (Sui Generis)                   | 0                                   |
|                                | Public house (Sui Generis)  | 470.9                                       | Public house (Sui Generis)                   | 420.2                               |
|                                | Basement / back of house  | 2341.7                                      | Basement / back of house                     | 5586.6                              |
|                                | TOTAL   | 14145                                       | TOTAL  | 40582.9                             |
|                                |   |   | TOTAL UPLIFT:                                | 26437.9                             |
| 3. OFFICE PROVISION IN THE CAZ | Existing: 9,215.1sqm<br>Proposed: 33,078.1sqm<br>Office uplift: 23,863sqm |   |  |                                     |
| 4. EMPLOYMENT NUMBERS          | EXISTING  |   | PROPOSED                                     |                                     |
|                                | Circa. 450  |   | Circa. 1,960 to 2,625                        |                                     |
| 5. VEHICLE/CYCLE PARKING       | EXISTING  |   | PROPOSED                                     |                                     |
|                                | Car parking spaces  | Basement parking shared with Dashwood House | Car parking spaces                           | Car free except 2 blue badge spaces |
|                                | Cycle long stay   | Unknown/minimal                             | Cycle long stay                              | 583                                 |
|                                | Cycle short stay  | Unknown/minimal                             | Cycle short stay                             | 92                                  |
|                                | Lockers   | Unknown/minimal                             | Lockers                                      | 389                                 |
|                                | Showers   | Unknown/minimal                             | Showers                                      | 42                                  |

|                                   |  |                 |  |     |
|-----------------------------------|--|-----------------|--|-----|
|                                   | Changing facilities  | Unknown/minimal | Changing facilities  | Yes |
| <b>6. HIGHWAY LOSS / GAIN</b>     | <p>Over 1,950sqm of new or improved public realm within the application red line, of which 700sqm is within Applicant ownership.</p> <p>Breakdown:<br/> Red line = 3,620sqm<br/> Applicant ownership = 2,228sqm<br/> Existing building footprint = 1,611sqm<br/> Proposed building footprint = 1,545sqm</p> <p>Highways gain (widening) along Old Broad Street and Wormwood Street. Two new pedestrian links north-south under the proposed 55 Old Broad Street building, and enhanced east-west public walkway between Old Broad Street and Bishopsgate.</p> <p>Old Broad Street pedestrian comfort level will increase from D to B+.</p> |                 |  |     |
| <b>7. PUBLIC REALM</b>            | <p>Two new pedestrian links connecting Wormwood Street with Bishopsgate Churchyard. Widened pavements on Old Broad Street and Wormwood Street. Enhancements to the public right of way through Bishopsgate Churchyard connecting Old Broad Street with Bishopsgate. Enhancements to existing area of hard-standing public realm between 65 Old Broad Street and Dashwood House.</p>  |                 |  |     |
| <b>8. STREET TREES</b>            | <b>EXISTING</b>  |                 | <b>PROPOSED</b>  |     |
|                                   | <p>No existing street trees on Wormwood Street or Old Broad Street.</p> <p>4 existing trees on Site: 2 x Category B, 2 x Category C.</p>   |                 | <p>No proposed street trees on Wormwood Street or Old Broad Street.</p> <p>1 no. Retained London Plane tree (Category B)</p> <p>6 proposed new trees between 65 Old Broad Street and Dashwood House.</p> <p>Other soft landscaping and planters proposed throughout the site at ground floor, terrace, and roof level.</p> |     |
| <b>9. SERVICING VEHICLE TRIPS</b> | <b>EXISTING</b>  |                 | <b>PROPOSED</b>  |     |
|                                   | <p>Off-site (via ramp to basement adjacent to Dashwood House).</p> <p>Precise quantum unknown.</p> <p>No Delivery and Servicing Management Plan in place, no consolidation or booking system.</p>  |                 | <p>Off-site (via ramp to basement adjacent to Dashwood House).</p> <p>65 trips per day (worst-case, unconsolidated).</p> <p>Consolidation to reduce trips by 25%.</p>  |     |



| <b>10. SERVICING HOURS</b>                                     | <p>Primarily overnight deliveries from 23.00 to 07.00 and managed through a delivery booking system.</p> <p>Day-time top-up delivers to be undertaken by cargo bike.</p>   |                  |                    |                  |            |                                 |     |     |     |                                    |     |     |                    |              |              |            |              |
|--|--|------------------|--------------------|------------------|------------|---------------------------------|-----|-----|-----|------------------------------------|-----|-----|--------------------|--------------|--------------|------------|--------------|
| <b>11. VOLUME OF RETAINED FABRIC</b>                           | <p>Substructure – 62% volume retention<br/>         Superstructure – 25% volume retention<br/>         Overall – 28% volume retention</p>  |                  |                    |                  |            |                                 |     |     |     |                                    |     |     |                    |              |              |            |              |
| <b>12. OPERATIONAL CARBON EMISSION SAVINGS</b>                 | <p>Improvements against <b>Part L 2021</b>:<br/>         New 55 Old Broad Street building: 2% reduction<br/>         Refurbished 65 Old Broad Street building: 84% reduction</p> <p>Improvements against <b>Part L 2013</b>, for comparison:<br/>         New 55 Old Broad Street building: 46% reduction<br/>         Refurbished 65 Old Broad Street building: 73% reduction</p>   |                  |                    |                  |            |                                 |     |     |     |                                    |     |     |                    |              |              |            |              |
| <b>13. OPERATIONAL CARBON EMISSIONS</b>                        | <p>25,434.9 tonnes CO<sub>2</sub> over 60 years<br/>         0.627 tonnes CO<sub>2</sub> per square meter over 60 years<br/>         (includes life-cycle modules B6 and B7)</p>   |                  |                    |                  |            |                                 |     |     |     |                                    |     |     |                    |              |              |            |              |
| <b>PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS</b> |  |                  |                    |                  |            |                                 |     |     |     |                                    |     |     |                    |              |              |            |              |
| <b>14. EMBODIED CARBON EMISSIONS</b>                           | <table border="1"> <caption>Embodied Carbon Emissions Data</caption> <thead> <tr> <th>Category</th> <th>GLA Benchmark</th> <th>GLA Aspirational</th> <th>550BS Site</th> </tr> </thead> <tbody> <tr> <td>A1-A5 (upfront embodied carbon)</td> <td>950</td> <td>600</td> <td>714</td> </tr> <tr> <td>B-C (in use stage embodied carbon)</td> <td>450</td> <td>370</td> <td>358 (excl. B6, B7)</td> </tr> <tr> <td><b>Total</b></td> <td><b>1,400</b></td> <td><b>970</b></td> <td><b>1,071</b></td> </tr> </tbody> </table> <p>A1-A5: upfront embodied carbon emissions per square meter<br/>         B – C (excluding B6 and B7): in use stage embodied carbon emissions per square meter</p> <p>Total embodied carbon of <b>28,980 tonnes CO<sub>2</sub>e (714 kgCO<sub>2</sub>e per sqm)</b></p> | Category         | GLA Benchmark      | GLA Aspirational | 550BS Site | A1-A5 (upfront embodied carbon) | 950 | 600 | 714 | B-C (in use stage embodied carbon) | 450 | 370 | 358 (excl. B6, B7) | <b>Total</b> | <b>1,400</b> | <b>970</b> | <b>1,071</b> |
| Category   | GLA Benchmark  | GLA Aspirational | 550BS Site         |                  |            |                                 |     |     |     |                                    |     |     |                    |              |              |            |              |
| A1-A5 (upfront embodied carbon)                                | 950  | 600              | 714                |                  |            |                                 |     |     |     |                                    |     |     |                    |              |              |            |              |
| B-C (in use stage embodied carbon)                             | 450  | 370              | 358 (excl. B6, B7) |                  |            |                                 |     |     |     |                                    |     |     |                    |              |              |            |              |
| <b>Total</b>   | <b>1,400</b>   | <b>970</b>       | <b>1,071</b>       |                  |            |                                 |     |     |     |                                    |     |     |                    |              |              |            |              |

**15. WHOLE LIFE CYCLE CARBON EMISSIONS**

Total whole life-cycle carbon emissions: **68,907 tonnes CO2**  
 Total whole life-cycle carbon emissions per square meter: **1.698 tonnes CO2/m2**

**16. WHOLE LIFE-CYCLE CARBON OPTIONS**

| Options appraisal summary                      | Light touch refurbishment - extension  | Intensive refurbishment - extension   | Full redevelopment  | Balanced approach   |
|--|--|---|---|---|
|  | <p>Retained:<br/>100% Substructure<br/>67% Superstructure<br/>79% Facade</p> | <p>Retained:<br/>83% Substructure<br/>48% Superstructure<br/>10% Facade</p> | <p>Retained:<br/>0% Substructure<br/>0% Superstructure<br/>0% Facade</p>  | <p>Retained:<br/>62% Substructure<br/>25% Superstructure<br/>10% Facade</p> |
|  | Option 1   | Option 2  | Option 3  | Option 4  |
| GIA  | 21,175m <sup>2</sup>   | 39,158m <sup>2</sup>  | 39,488m <sup>2</sup>  | 39,488m <sup>2</sup>  |
| Upfront embodied carbon (A1-A5)                | 340 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                   | 580 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                  | 590 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                | 562 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                  |
| % Substructure retained relative to existing   | 100% by volume   | 83% by volume   | 0% by volume  | 62% by volume   |
| % Superstructure retained relative to existing | 67% by volume  | 48% by volume   | 0% by volume  | 25% by volume   |
| % Facade retained relative to existing         | 79% by area  | 10% by area   | 0% by area  | 10% by area   |
| Life-cycle embodied Carbon [A-C(exc.B6-B7)]    | 655 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                   | 895 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                  | 882 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                | 839 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                  |
| Operational Energy (B6) (60 years)             | 698 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                   | 361 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                  | 361 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                | 361 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                  |
| Total WLCA [A-C(exc.B7)] (60 years)            | 1,355 kgCO <sub>2</sub> e/m <sup>2</sup> GIA<br>28,695 tCO <sub>2</sub> e    | 1,265 kgCO <sub>2</sub> e/m <sup>2</sup> GIA<br>49,533 tCO <sub>2</sub> e   | 1,266 kgCO <sub>2</sub> e/m <sup>2</sup> GIA<br>50,010 tCO <sub>2</sub> e | 1,218 kgCO <sub>2</sub> e/m <sup>2</sup> GIA<br>48,103 tCO <sub>2</sub> e   |

**17. TARGET BREEM RATING**

Excellent – for 55 and 65 Old Broad Street  
 55 Old Broad Street: aspiring to Outstanding (policy target Excellent or outstanding)



**18. URBAN GREENING FACTOR**

0.43 (based on a reduced red line excluding adopted highway)  
 0.31 (based on full red line)

**19. AIR QUALITY**

Air Quality Positive statement submitted as part of the EIA, in line with GLA Guidance.

The scheme is car-free, with the exception of two blue badge parking spaces.

All-electric energy strategy for the provision of heating and hot water (ASHPs) and will include solar photovoltaic (PV) panels to provide some of the electricity requirement.

There is the provision for a diesel generator for life-safety and business continuity purposes.

## **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 any body required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also form part of the environmental information to be examined and taken into account by your Committee.
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**

55 and 65 Old Broad Street

8. The Site extends to 3,728 sqm (0.37 ha) and is bound by the Metropolitan Arcade to the north, Dashwood House and the grounds of St Botolph without Bishopsgate Church to the east, Wormwood Street to the south, and Old Broad Street to the west.
9. The red line boundary includes parts of Wormwood Street and Old Broad Street and the now-unused elevated pedestrian walkway running from the Site across Wormwood Street to the south of the existing building known as Broad Street House.
10. The Site currently contains one building of ground plus 5 to 11-storeys (including roof plant), that also has a two-level basement. The existing building on Site currently comprises both 55 and 65 Old Broad Street as the buildings are currently linked. The Site is predominantly comprised of an L-shaped 1970s building named Broad Street House, which turns the corner of Wormwood Street and Old Broad Street and spans the addresses of 55 to 65 Old Broad Street with Bishopsgate Churchyard to the east to the south of Dashwood House.
11. The singular on-site building (comprising 55 and 65 Old Broad Street) currently accommodates The Kings Arms pub, a Barclays bank, two take away food shops, a William Hill betting shop and three retail stores at ground floor. The rest of the building contains offices. The existing different mixed uses amount to 14,150sqm of existing floor space. A total of 9,220sqm is currently office

floorspace (Class E), 1,433sqm comprises retail (shop/café) uses (Class E), 582sqm comprises a bank (Class E), 102sqm comprises a betting shop (Sui Generis), 471sqm comprises a public house (Sui Generis) and 2,342sqm comprises basement/back of house uses.

#### Bath House (7-8 Bishopsgate)

12. The Site also includes the Grade II listed Victorian Bath House, and a publicly-accessible area of hard landscaping between 55 Old Broad Street and Dashwood House through which a Public Right of Way runs west to east between Old Broad Street and Bishopsgate.
13. The Bath House dates back to the Victorian era and was first listed (as Grade II) in March 1976. It was first constructed as an ornate single storey kiosk attached to the old Broad Street House, containing a staircase down into a much larger basement space originally home to Turkish leisure baths which remained in such use until the 1950s. Since then it has been converted for use as restaurants and, more recently, a private events venue / club – which is its current lawful use.
14. The Site is not located within a Conservation Area but is bounded by the New Broad Street Conservation Area on its western side, and by Bishopsgate Conservation Area to the north of 65 Old Broad Street and to the east of 55 Old Broad Street. Finsbury Circus, Bank, and St Helen's Place Conservation Areas are also within a c.150m radius from the Site.
15. There are a number of heritage assets in the immediate vicinity of the site. These include:
  - London Wall: Remains of Roman and medieval wall from West End
  - Church of St Botolph (Grade II\*) and Church Hall (Grade II) and the Drinking Fountains, Overthrows and Lanterns (Grade II)
  - Bishopsgate Parish Memorial (Grade II)
  - Church of All Hallows (Grade I)
  - 62 Old Broad Street (Grade II)
  - 56-60 New Broad Street (Grade II)
16. Other designated heritage assets in the wider setting include:
  - Great Eastern Hotel at Liverpool Street (Grade II)
  - Liverpool Street Station (Grade II)
  - 76-80 Old Broad Street (Grade II)
  - St Paul's Cathedral (Grade I listed)

17. The Wormwood Street and Old Broad Street frontages of the Site are designated Principal Shopping Centres.
18. The closest neighbouring residential properties to the application site are directly to the east, including four flats at 25 Wormwood Street and 1 flat at 26 Wormwood Street and eight flats at 10 Wormwood Street. Some 300 metres further to the east are 160 flats at 80 Houndsditch and to the north-west 2 flats above The Railway Tavern, 15 Liverpool Street.

### **Proposals**

19. Planning permission under 23/00469/FULEIA is sought for:
  - Partial demolition of the existing buildings and the development of the site comprising the construction of a new building of ground floor plus 23 storey (plus two retained basement levels) of office use (Class E(g)) with flexible retail/café (Class E(a)(b)) at ground floor at 55 Old Broad Street.
  - The retention of part of 65 Old Broad Street for the provision of flexible retail / cafe / maker / studio (Class E(a)(b) and (Class F1(a)(b)(e)) at ground floor, maker / studio (Class F1(a)(b)(e)) at first floor, cultural/events space at second floor and flexible maker / studio / office (Class F1(a)(b)(e)) and (Class E(g)) at third and fourth floor.
  - Renovation of the Grade II Listed Bath House for the provision of cultural/event uses (Sui Generis).
  - Provision of replacement public house (Sui Generis).
  - Improvements to public realm and routes.
  - Ancillary basement cycle parking.
  - Servicing and plant.
  - Highway improvements and other works associated with the proposed development.
20. Listed Building Consent under 23/00966/LBC is sought for:
  - Refurbishment of the Bath House involving demolition of hard landscape slab and of 20th Century sections of the building above ground; ground floor extension to provide elevator shaft and cafe kiosk; external restoration, decoration and alteration including new accesses into the building; internal restoration, decoration and alteration including works to accommodate elevator shaft; new hard and soft landscaping including green roof and basement skylights; and exploratory works at basement level to facilitate further restoration activity.
21. The scheme would provide 40,583sqm GIA floor space, comprising:



### *55 Old Broad Street*

- 33,078 sqm of office floorspace;
- 125 sqm of retail/café floorspace (ground floor);

### *65 Old Broad Street*

- 112 sqm of retail/café/maker/studio floorspace (ground floor);
- 243 sqm of maker/studio floorspace (level 1);
- 31 sqm of cultural/event floor space (Level 2 of 65 Old Broad Street)
- 668 sqm of office/maker/studio floorspace (Level 3 and 4).

### *Bath House*

- 320sqm of cultural/event floor space at the Bath House.

### *Other*

- 420 sqm of public house floorspace;
- 5587 sqm of ancillary floorspace (including basement levels).

### *Basement Level*

22. Basement Level 1 will provide ancillary floorspaces within 55 and 65 Old Broad Street, and cultural and events space within The Bath House. Ancillary space will be provided at Basement Level 2 of 55 and 65 Old Broad Street, as well as within The Bath House. Three servicing bays will also be provided within Basement Level 2 with one located in 55 Old Broad Street and two located in 65 Old Broad Street.

### *55 Old Broad Street*

23. The proposed development will separate the currently linked 55 and 65 Old Broad Street buildings and 55 Old Broad Street would have two distinct building areas separated by a new pedestrian route. To the east the proposed new building would consist of a new mixed use building of a maximum height of 103.15m AOD consisting of 23 upper storeys (plus 2 retained basement levels).
24. The proposed scheme would provide flexible Grade A office floorspace within 55 Old Broad Street. The proposed lobby at ground floor is sizeable to accommodate any future sub-division with entrances from both its Wormwood Street and Bishopsgate Churchyard frontages. The rest of the building to the east will provide retail/ café, reception, pub and lift lobby spaces at ground level; office, plant, lift lobby spaces and pub (storage, toilets and back of house) uses at Level 1; and predominately office at Level 2.



25. From Levels 3-23 of 55 Old Broad Street office space would be provided with small terraces areas. Multi-level terraces will be provided over levels 19 and 20. Level 19 will contain a planted roof terrace for communal use, with a Level 20 terrace for the use of the level's tenant occupier.
26. A 'Visitor Cycle Pod' will be provided to the west (at the corner of Old Broad Street and Wormwood Street). This will accommodate retail/ café space as well as ancillary space at the ground floor. Ancillary space will also be provided at Levels 1 and 2. 184 cycle storage spaces (72 short stay and 112 long stay) will be delivered across the three building levels.

#### *65 Old Broad Street*

27. The proposed scheme includes the retention and refurbishment of the 65 Old Broad Street building. It is proposed to be used for a range of separate but linked uses across four floors, specifically providing retail/café/maker/studio/office floorspace. In addition, there is associated cultural/event space at second floor level in the open terrace space.
28. The ground floor of the retained building would comprise 112 sqm of affordable retail/café space which is designed to be linked to the 243 sqm maker/studio space at first floor level. Both levels will be available for 'qualifying users' and available at a discounted market rent.
29. The third and fourth floors of the retained building would offer 668 sqm of flexible office/maker/studio floorspace.
30. The second floor of the retained building would be an open terrace overlooking Old Broad Street to the west. This would be available for general amenity and events related to the activities of the tenants of the building and also associated with the use of the Bath House where other cultural/event floorspace is provided.

#### *Public House*

31. A proposed new pub to replace the existing offering would be located in the eastern part of the application site over two levels of basement, ground floor and first floor. This would be located where the existing pub is located with access from the south off Wormwood Street. There would be associated external areas within a new walkway to the north within the new proposed public realm.

#### *Cultural/Event Floor Space (Bath House)*

32. The Victorian Bath House is currently used as private events space. The proposed scheme proposes to retain and refurbish the building as an enhanced event space comprising 320sqm GIA of Sui Generis floorspace. A glazed extension will be created adjacent to 55 Old Broad Street and The Bath House that will support access to its basement.
33. The Bath House will be available for a range of users, including tenants of the building, other companies and groups (as part of private hire) and for cultural and community users to which it will be available for free public use at designated times.

*Bath House (Listed Building Consent)*

34. The submitted Listed Building Consent proposes the following works:
  - Removal of extensions and alterations/repairs to facades on western and southern elevations, including works to windows and doors to match/complement the existing northern and eastern elevations – which will themselves be refurbished and redecorated, keeping and restoring the original Victorian elements wherever possible.
  - Ground floor extension to southern façade, providing an elevator shaft allowing level access into the basement event space. The eastern side of this extension would contain a café kiosk, ancillary for use by the operators of the event space. The extension would join the northern glazed façade of the 55 Old Broad Street office lobby on which an ornate patterned finish is proposed as an enhanced backdrop to the Bath House.
  - Internal alterations, including general redecoration/refurbishment and restoration to better perform as an event space as well as to accommodate the lift access and bathroom for disabled users.
  - Removal of existing hard landscape slab above the basement to provide a flush area of public realm with decorative skylights into the space beneath.
  - Other general repairs, decorations, and soft landscaping including green roofing.

*Public Realm*

35. The proposal would enhance pedestrian routes from Liverpool Street Station through the site moving south. The proposal includes 2000 sqm of ground floor public realm within the site boundary wrapping around, underneath and in between the proposed new building at 55 Old Broad Street, the visitor cycle hub, the retained 65 Old Broad Street and the Bath House.
36. Improved pedestrian routes are proposed as part of the public realm strategy, running north to south between 65 Old Broad Street and Dashwood House and

through to Wormwood Street (to the west of the Site), running east to west from Old Broad Street through to the adjacent churchyard and on to Bishopsgate, and north to south from the new public realm to Wormwood Street past the new public house (to the east of the Site). The existing Public Right of Way between Old Broad Street and Bishopsgate, through the Churchyard, would be maintained and enhanced.

37. Within the public realm, it is proposed to have areas for the display of art installations, with the intention to use these areas for the showcasing of work of local artists' and educational institutions, with a focus on 'the arts', a number of which Landsec are engaged with.

#### *Ancillary Space*

38. The scheme retains the existing two levels of basement and works largely within the constraints of the existing foundations. The two basement levels are shared between all proposed users of 55 Old Broad Street and 65 Old Broad Street, save for the Bath House and Public House which have their own segregated basement areas. The basement otherwise stretches across the whole Site underneath 55 Old Broad Street and 65 Old Broad Street, and beyond the Site underneath Dashwood House, connecting the three buildings.
39. Underneath 65 Old Broad Street, the B1 and B2 levels would accommodate the long-stay cycle provision and end of-trip facilities for users of both 55 and 65 Old Broad Street. These can be accessed via the existing ramp that can be entered off Old Broad Street, which circles down and around Dashwood House and into the basement, or via a new lift from a dedicated cycle lobby on the rear ground floor of 65 Old Broad Street.
40. Underneath the Site, the B1 level comprises all plant, with additional changing and end-of-trip facilities adjacent to the lift core. The B2 level is much smaller and comprises only a refuse store and lift overruns.
41. A visitor cycle store is proposed directly adjacent to the 55 Old Broad Street reception entrance, co-located in a 'pod' along with a retail/café space.
42. Two sets of UKPN infrastructure are required and delivered as part of the scheme, one being in a room retained in-situ within the B1 level beneath 65 Old Broad Street and the other being in a new room within the pod at the corner of Old Broad Street and Wormwood Street.
43. All delivery and servicing for the development is proposed within the confines of the Site. Three servicing bays are housed at the B2 level and are accessed via the Dashwood House basement access ramp, as per the current situation.

44. The dis-used elevated walkway will be decommissioned and removed as part of the proposed development.
45. Amended plans were received on the 29<sup>th</sup> September 2023 to respond to design queries by CoL and the responses from the initial consultation phase. The submitted design changes are summarised as follows:
- Relocated Bath House elevator, and introduction of ground floor café kiosk ancillary to the proposed cultural/event use).
  - Refined Bath House setting - treatment to office lobby façade, and landscaping;
  - Refined pub façade detailing;
  - Changes to elevational treatment at the top of 55 Old Broad Street to crown it with a loggia;
  - Amended façade colour tones on southern and eastern elevations of 55 Old Broad Street;
  - Softening of terrace balustrade and landscaping at 19th level of 55 Old Broad Street, and decrease in terrace floor level, to minimise sky-gap reduction to St Paul's Cathedral Waterloo Bridge views in particular;
  - Ground floor landscaping changes including increased planting, locations for TfL wayfinding and underground signage, recessed revolving doors to office lobby, an indicative water fountain location; and
  - Developed vision for the future highways layout of Old Broad Street and Wormwood Street.

## **Consultations**

### **Statement of Community Involvement**

46. The Applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders including:
- Stage 1: 'Reimagining 55 Old Broad Street' event took place at 55 Old Broad Street on the 26th of October 2022 between 4.00pm and 8.30pm. 71 advanced free tickets were booked through Eventbrite; 600 leaflets were distributed in a 0.25km catchment and a mailing list of 125 contacts was also sent the invitation. There were 108 attendees to this event which was designed to share applicant's ambitions based on no architectural drawings. Overall feedback was positive around new cultural offerings within the site with most responses expressing what improved infrastructure and public realm enhancements they would like to see from the future development.

- Stage 2: A second event took place on the 17<sup>th</sup> November 2022 between 4pm and 8:30pm which took the form of a creative workshop. 44 advanced tickets were books through Eventbrite; 500 leaflets were distributed and a mailing list of 230 contacts were also sent the invitation. There were 108 attendees to this event which included presentation my Fletcher Priest Architects with display boards exhibiting sketch illustrations and overall strategy. There was a focus on the 65 Old Broad Street element of the proposed scheme. Overall feedback was positive with many expressing a desire to explore the Bath House and for this to be publicly accessible. Other feedback related to the need for free activities, creative hubs were lacking and creating a more pedestrian friendly public realm.
  - Stage 3: A third event took place on the 9<sup>th</sup> February 2023 between 4pm and 8:30pm with increased members of the design team and further creative workshops. Further architectural material was shared including use of VR goggles to imagine a 360-degree view of the proposals. 41 advanced tickets were books through Eventbrite; 500 leaflets were distributed and a mailing list of 245 contacts were also sent the invitation. There were 126 attendees to this event. Overall feedback was positive with support for improves routes through the site, desire for greener spaces and more events for health/wellbeing.
  - Stage 4 and 5: A final exhibition took place on the 8<sup>th</sup> March 2023 (and then on the 9<sup>th</sup> March 2023) between 4:00m and 8:30pm. This took the form of creative workshops and a final exhibition sharing detailed architectural material as above. 15 advanced tickets were books through Eventbrite; 400 leaflets were distributed and a mailing list of 255 contacts were also sent the invitation. A brand awareness campaign also launched on Instagram that generated 346,000 impressions and 188 engagements. There were 69 attendees to this event. Overall feedback was positive with most comments relating to the improving the public realm, interest in affordable art studios and maker spaces and retention of part of the existing building at 65 Old Broad Street.
47. The applicant has undertaken a consultation process whereby they engaged with 424 people during their stakeholder engagement processes. Attendees ranged from local workers, residents, representatives from local organisations including St Botolph without Bishops Church and the EC Bid. Most responses related to the 'carbon story' for the application site, infrastructure improvements, public realm enhancements and cultural offering embedded within the wider scheme. There was support for affordable artist/maker spaces and restoring the Bath House as a public cultural venue. There was general consensus that the site was not pedestrian friendly enough, there is a lack of cycling infrastructure and links to Liverpool Street Station.

## 65 Old Broad Street – Temporary Use

48. The proposed uses (flexible retail / cafe / maker / studio (Class E(a)(b) and (Class F1(a)(b)(e))) in 65 Old Broad Street are currently being tested in a pilot phase with an operator selected. Hive Curates have taken occupation of the space for 18 months from July 2023 as an initial trial period prior to the construction phase of development.
49. Since occupying part of 65 Old Broad Street, Hive Curates have launched 'Broadworks', comprising of an event for local workers and stakeholders on the 6<sup>th</sup> September 2023. This event was interactive with art workshops, a tour of the space, an exhibition internally and on the terrace space. The next exhibition opened on the 19<sup>th</sup> October. The space will be open until December 2024 offering 10 modular artist's studios, gallery space with a program of exhibitions, shop/café space at ground floor with space to host workshops and the terrace space which is also bookable for events. Other events supported by the EC Bid will also take place in the space with the applicants (Landsec) working with Hive Curates over the course of the next 15 months to better understand the space and how this can best be managed and utilised in the long term under the banner of the proposed uses.

### Statutory Consultation

50. Following receipt of the application, it has been advertised on site and in the press and has been consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Copies of all received letter and e-mails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the table below.
51. 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.
52. The views of other City of London departments have been taken into account in the preparation of this report.
53. Following consultation feedback, as set out above, the applicant made design amendments, and these were received on the 29<sup>th</sup> September 2023. Accordingly, a 30-day re-consultation has been undertaken. Comments from the second consultation are also set out below.

| <b>Consultation Responses</b>              |  |
|--|--|
| Thames Water<br>5th June 2023              | Conditions suggested.<br><br><b>Officer Response:</b> Conditions appended.   |
| London City Airport<br>6th June 2023       | No safeguarding objections to the proposed development.<br><br><b>Officer Response:</b> Conditions appended.   |
| NATS<br>6th June 2023                      | No objections.<br><br><b>Officer Response:</b> Conditions appended.  |
| Environment Agency<br>7th June 2023        | No objections.<br><br><b>Officer Response:</b> Conditions appended.  |
| Heathrow<br>Safeguarding<br>7th June 2023  | No objections.<br><br><b>Officer Response:</b> Conditions appended.  |
| Crossrail<br>Safeguarding<br>9th June 2023 | Conditions suggested.<br><br><b>Officer Response:</b> Conditions appended.   |
| Thames Water<br>(Amended)<br>9th June 2023 | Conditions suggested.<br><br><b>Officer Response:</b> Conditions appended.   |
| Transport For London<br>12th June 2023     | Conditions suggested.<br><br><b>Officer Response:</b> Conditions appended.   |
| Thames Water<br>15th June 2023             | Conditions suggested.<br><br><b>Officer Response:</b> Conditions appended.   |
| Network Rail, 25th<br>July 2023            | Conditions suggested.<br><br><b>Officer Response:</b> Conditions appended.   |
| Historic England<br>19th June 2023         | The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter. |



## Assessment of Significance and Impact

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: City of London APA. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

The site lies partially over the Scheduled Monument of the Roman wall. The city ditch, of Roman and medieval date, also runs through the site. An archaeological desk based assessment (MOLA 2023) was submitted with the planning application which highlights that significant archaeology has been found in the vicinity of the site. The site is also located directly adjacent to, and partly over, the burial ground of St Botolph without Bishopsgate. However, the site has been extensively truncated by the current development and previous development on the site.

An archaeological evaluation was carried out comprising test pits and boreholes in the expected vicinity of the Scheduled wall (MOLA 2021-22). The investigations revealed truncated natural gravel above which was modern made ground. No evidence for the Roman city wall was identified and the levels of truncation on the site, compared with the known levels of the wall nearby, indicate that the wall is likely to have been completely truncated by previous development on the site. However, the city ditch was dug to a greater depth than the wall and there is therefore some potential for the base of this feature and other deep cut features to survive beneath the current single storey basement. No archaeology is expected to survive in the double basemented area.

In the eastern part of the site there is to be an extension of the secant piled wall and some new piling along the eastern boundary, which may extend into the former churchyard of St Botolph's. As proposed and previous impacts are not well understood in this location, archaeological evaluation is recommended to establish if any remains of the burial ground survive.

Although the evaluation found no evidence for the survival of the Scheduled Roman and medieval wall, Scheduled Monument Consent will still need to be obtained in advance of construction work commencing. The Inspector of Ancient Monuments, Ms Jane Sidell, Historic England, should be



contacted in the first instance, in regards to the Scheduled Monument Consent.

#### Recommendations

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation 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 a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

I therefore recommend attaching a condition as follows:

Condition 1 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.

#### Informative

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.

This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition, please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 205.

I envisage that the archaeological fieldwork would comprise the following: Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Archaeological evaluation should be carried out in the former St Botolph's churchyard in the east of the site where a new secant piled wall and new piling are proposed. The Written Scheme of Investigation for the evaluation should demonstrate a good understanding of the expected impacts from the new development and provide a scheme of targeted evaluation trenching. If archaeological remains are identified, a second phase of archaeological mitigation is likely to be necessary.

I also recommend a second condition, in regards to works in the current single basement: Condition 2 Investigation

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|  | <p>No demolition or development shall take place until a 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, which shall include the statement of significance and research objectives, and</p> <p>A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</p> <p>B. Where appropriate, details of a programme for delivering related positive public benefits</p> <p>The programme for post-investigation assessment and subsequent analysis, publication &amp; 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 WSI</p> <p>Informative</p> <p>The written scheme 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.</p> <p>This pre-commencement condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this pre-commencement condition, please let us know their reasons and any alternatives suggested. Without this pre-commencement condition being imposed the application should be refused as it would not comply with NPPF paragraph 205.</p> <p>I envisage that the archaeological fieldwork would comprise the following:</p> <p>Evaluation</p> |
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An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Archaeological evaluation should be carried out in the former St Botolph's churchyard in the east of the site where a new secant piled wall and new piling are proposed. The Written Scheme of Investigation for the evaluation should demonstrate a good understanding of the expected impacts from the new development and provide a scheme of targeted evaluation trenching. If archaeological remains are identified, a second phase of archaeological mitigation is likely to be necessary.

I also recommend a second condition, in regards to works in the current single basement: Condition 2 Investigation  
No demolition or development shall take place until a 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, which shall include the statement of significance and research objectives, and

- A. 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 WSI

Informative

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|  | <p>The written scheme 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.</p> <p>Watching Brief</p> <p>An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.</p> <p>An archaeological watching brief should be carried out in the single basement area of the site during excavation for the new development in order to establish if the bases of deep cut archaeological features survive. If features are present, time should be allowed in the programme for excavation and recording of them. Scheduled Monument Consent will also be necessary for this phase of work</p> <p>You can find more information on archaeology and planning in Greater London on our website.</p> <p>This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.</p> <p><b>Officer Response:</b> Addressed in the Archaeology sections of the report and conditions appended.</p> |
| <p>The Georgian Group<br/>6<sup>th</sup> July 2023</p> | <p>Significance of Heritage Assets Affected</p> <p>St Botolph's church is of exceptional significance and makes a strong contribution to the surrounding streetscape and views within the area. This is due to the prominence of the spire of St Botolph's and its role within key views along Bishopsgate Road and particularly within One Bishopsgate Plaza. The architect James Gould designed the building along with George Dance Snr. in the early 18th century. Dance went on to become Clerk of Works for the City of London and thus had effective control of architectural changes within the City. All Hallows-on-the-wall is located</p>  |

east of the site and is grade I listed. The church was designed by George Dance the Younger who at the time was working under his father George Dance Snr then Clerk of Works for the City of London. Dance the Younger would go on to succeed his father on his death in 1768 and undertake significant projects within the City of London. The western tower is appreciated in views down London Wall looking West which contributes to the significance of this grade I listed building. Its prominence along the London Wall is a contributing factor to the New Broad Street Conservation Area which states the 'southern boundary of the conservation area, is dominated by the Church of All Hallows on the Wall'. Celebrations to mark the tercentenary (2023) of the death of Sir Christopher Wren, architect of St Paul's, are now underway and the landmark role that the cathedral's great dome and supporting drum have played in London's skyline for the past three centuries is of public interest. St Paul's Cathedral is Wren's masterpiece, and its dome became an obsession. As part of plans to repair and rejuvenate Old St Paul's, before its destruction in The Great Fire, Wren proposed the introduction of a new domed crossing to the medieval building. The idea of the dome ran through all his subsequent designs for the new cathedral and was finally executed in the form we see today. Ever since its completion, St Paul's has dominated London's skyline and has both provided the stage for great national events and been depicted in innumerable works of art. The role and contribution of St Paul's Cathedral to London's skyline is recognised within the London View Management Framework.

#### The Proposals

The application for Planning Permission concerns the redevelopment of the site development of a 24-storey building to the south of the site along with a 6-storey development to the north of the site. A full description of the proposed works can be found at the head of this letter.

#### The Georgian Group Advice

As stated above, the settings of three heritage assets allow for the buildings to be appreciated and for their prominence to be preserved amongst the surrounding built environment and City skyline. The proposed development would obscure views towards the heritage assets and compete visually with their form in the skyline causing harm to the individual heritage assets. View 22 within the submitted THVIA

presents the impact of the 24-storey tower when looking west from the One Bishopsgate Plaza. Within this view, the tower of St Botolph's Church holds the viewers eye and the clear skyline, despite the presence of 99 Bishopsgate, contributes to the setting and significance of the church whilst enhancing the City skyline. The introduction of the 24-storey tower would compete with the tower visually removing the ability to appreciate the church within the City skyline and would cause less than substantial harm to the significance of St Botolph's Church. View 13 within the THVIA provides a view looking east down London Wall towards the development with All Hallows Church present in the foreground. The western tower in this view is of interest and its present setting allows for the silhouette of the tower to be appreciated whilst also holding prominence along eastern views down London Wall and with reference to the New Broad Street Conservation Area, the southern boundary. The 24 storeys would present a distracting backdrop to All Hallows which would compete with the church, whilst in kinetic views down London Wall dominate the skyline behind. The height and massing of the tower would therefore cause an element of less than substantial harm to the significance of All Hallows. St Paul's Cathedral dome has been a landmark and constant on London's skyline for over three centuries and it's this element which is such a contributing factor to the significance of St Paul's. The best place to appreciate this dominance amongst the skyline is from Waterloo Bridge and is protected within the London View Management Framework as part of views 15 B1 & B2 downstream. Within these views, St Paul's sits against a clear skyline enhancing its dominance and ability to appreciate the form of the dome. Relevant to this application is view 15B1 downstream where the development would sit in line and compete visually with the peristyle causing an element of less than substantial harm to St Paul's Cathedral. The cumulative impact of the proposed scheme alongside no.55 Bishopsgate will also have to be considered. The applications together would raise the level of harm caused due to visual distraction the two buildings would pose in views from Waterloo Bridge. The Group would also urge the City of London to bear in mind future applications that are expected within the close vicinity, namely that of the redevelopment of Liverpool Street Station which would again elevate the harm on views towards St Paul's Cathedral.

Recommendation



As the application stands, the proposed 24 storey tower, due to the height and massing, would cause less than substantial harm to the significance of the three heritage assets referred to above. The cumulative impact of surrounding developments has the potential to raise the level of less than substantial harm to St Paul's Cathedral and should be given particular consideration by your local authority. Paragraph 199 of the NPPF reinforces the need to give great weight to a heritage asset's conservation, and the more important the asset, the greater the weight should be. All Hallows Church and St Paul's Cathedral are both grade I listed buildings and should be given the highest level of weight when it comes to conserving both those assets. St Botolph's is grade II\* listed building and again should be given a high level of weight. Furthermore, the following advice from paragraph 013 of the Planning Practice Guidance accompanying the NPPF entitled 'What is the setting of a heritage asset and how can it be taken into account?' is directly relevant: 'When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change'. Additionally, Historic England's guidance on the setting of heritage assets states: 'Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset'. Paragraph 013 of the Planning Practice Guidance additionally states: 'The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each'. As the proposals cause an element of less than substantial harm to the significance of three heritage assets, paragraph 202 of the NPPF is engaged. Paragraph 202 sets out the need to weigh public benefits against the harm caused. The Group recommends the applicant withdraw the application for Planning Permission due to the harm arising



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|  | <p>from the proposals. If the applicant is unwilling to do so, your local authority should refuse consent. As the decision maker, your local authority should take these comments on board when undertaking the balancing act set out within paragraph 202 of the NPPF. Additionally, the statutory duty set out within sections 66(1) of the Planning (Listed Building and Conservation Area) Act 1990. Within the Act, it states that special regard should be given to the desirability of preserving a building or its setting or any features of special architectural or historic interest which it possesses. Your authority should take these representations into account when determining this application.</p> <p><b>Agent Response:</b> An Addendum Pack dated 29<sup>th</sup> September 2023 was submitted in response to the concerns raised.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p>  |
| <p>Victorian Society<br/>12<sup>th</sup> July 2023</p> | <p>Thank you for consulting the Victorian Society about this application. We object to the construction of the proposed 23-storey building in this location, which would cause unwarranted and significant harm to the setting of the Grade II listed former Turkish Bath House and less than substantial harm to the New Broadstreet and Bishopsgate Conservation areas. We also have strong and serious concerns about the lack of LBC submitted with this application.</p> <p>Significance and harm:</p> <p>The former Turkish Bath house is a Grade II listed Islamic-styled building, modelled on the Church of the Holy Sepulchre in Jerusalem. It was designed by S. Harold Elphick and built between 1894-1895, with later 20th-century alterations and extensions. Notable for its small rectangular scale with a polygonal apse designed with faience tiles, terracotta brick, and surmounted by a lantern, the building's interiors are remarkable for their quality and unusual Islamic-styled tiles designed by Elphick. The lavish interiors include tiled archways, pillars, framed mirrors, and panels of hand-painted tiles. The baths remained in use until the 1950s, after which they were adapted into a restaurant and are now currently an events space. The combined proximity and scale of the proposed 23-storey building demonstrate a staggering lack of deference to the significance of this Grade II listed building. The building would dwarf and overshadow the heritage asset by partially</p> |

cantilevering over it, essentially engulfing the building in an artificially lit, cave-like space. The ability to appreciate the outline of the lantern, a crucial architectural feature of the bath house meant to be seen in silhouette against the sky, would be greatly reduced. Furthermore, the proposal would greatly impact the ability to appreciate the heritage asset as separate from the proposed structure, reducing the bath house to an ornament in the lobby of a 23-storey building. The current space around the heritage asset allows for the full appreciation of its architectural interest, while the proposal would significantly diminish this. Furthermore, the massing of the proposed building would impact views in and out of the New Broad Street and Bishopsgate Conservation areas, both noted in their appraisals for their architectural quality and nationally important buildings. In particular, the massing of the proposal would actively compete with the careful outline of the Flemish Renaissance-style Grade II\* listed former Great Eastern hotel, as viewed from the Bishopsgate Conservation area. Additionally, the views along New Broad Street looking east, noted for their high-quality buildings of Portland stone and brick would be abruptly hemmed in by the proximity of the proposed building, further eroding the relatively broad and open character of this street. Overall, the proposed building would largely sit within the Bank Character area and a small proportion within The City Cluster. The City Cluster is defined as a specific area considered by the local authority to be “less sensitive” to the impact of tall buildings on the City’s character and heritage. The proposed building, which largely sits outside of this boundary, seeks to respond to the scale and character of those high rise buildings within the City Cluster and not the area in which the proposed would be largely situated in. Therefore, a proposal of this scale, outside of this specific boundary, should be considered inappropriate and harmful for its detrimental impact on the City’s character and heritage. We also have strong and serious concerns about the lack of LBC submitted with this application. The plans clearly show major alterations to the curtilage of this heritage asset, notably the demolition of large parts of the 20th-century extension to the west, plant works, and the likely 19th-century remains of Broad Street House to the south, severing the last link to the buildings original setting. The construction of a new west and south wall, restoration throughout, and underpinning works to the underground walls of the bath house are also proposed. The application thoroughly lacks the detail we would expect for this sort of work. This application should be rejected solely for the lack of accompanying LBC.

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|   | <p>Policy:</p> <p>The City Plan for 2040 identifies only two areas as suitable for tall new buildings: the City Cluster and Fleet Valley. The City Cluster covers only a very small corner of the proposed site, with the majority of the site sitting in the Bank Character area, which is not designated as suitable for new tall buildings. Policy 7.7 of the London Plan states that "the impact of tall buildings proposed in sensitive locations should be given particular consideration. Such areas might include conservation areas, listed buildings, and their settings..." Paragraph 199 of the NPPF states that "great weight should be given to the asset's conservation," including the setting of heritage assets. The construction of this 23-storey tower would cause great, unjustified, and significant harm to the setting of the Grade II listed bath house and less than significant harm to views in and out of the Bishopsgate and New Broad Street conservation areas. Moreover, the lack of a listing building consent for significant works to a heritage asset alone is reason enough to reject this application. We urge your authority to refuse consent for a scheme that would cause irreversible harm.</p> <p><b>Agent Response:</b> The applicant engaged with the Victorian Society to discuss the proposals. An Addendum Pack dated 29<sup>th</sup> September 2023 was submitted in response to the concerns raised.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p> |
| <p>Historic England<br/>20<sup>th</sup> July 2023</p> | <p>Thank you for your letter of 3 July 2023 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.</p> <p>Summary</p> <p>The proposals would affect the setting of several highly graded listed buildings, including St Pauls Cathedral, the churches of St Botolph and All Hallows and the Great Eastern Hotel, in addition to the Grade II listed former bath house on the site. Should you be minded to determine this application positively, we think some of the harm we have identified could be minimised in accordance with the requirements of the Development Plan and National</p>  |

Planning Policy Framework (NPPF). We therefore recommend that you seek amendments as set out below.

#### Historic England Advice

Historic England had the opportunity to comment on an earlier iteration of the proposals at the pre-application stage. The scheme has been developed further since then, and a greater number of verified views have been provided, enabling a better understanding of the impacts.

#### Significance of the heritage assets

##### a) The development site

55 Old Broad Street is a tall office building of the 1970s, designed by Ley, Colbeck & Partners. The slab block has smoked-glass curtain-walling within a stone frame and it sits on a podium of brown granite. It sits above a portion of the below ground remains of the Roman and medieval City wall, which runs east-west through the site and is a Scheduled Monument.

The site also contains the former Turkish baths (8 Bishopsgate Churchyard), comprising of a small above ground kiosk and rooms below. It was designed by S. Harold Elphick in the 1890s in an elaborate Islamic style. Both the above ground building and the interiors have richly detailed tiling, which, although somewhat compromised by later interventions, are clearly of special interest. The building is Grade II listed.

##### b) The Church of St Botolph without Bishopsgate

The site is bounded to the east by the churchyard of St Botolph without Bishopsgate, a large open space and a public garden from 1863 (notably, the first churchyard to be transformed as such following the Burial Act of 1852). The early-Georgian church was built to designs by James Gould in 1725-8. The elaborate east front and church tower are designed in the Wren manner and the side elevations are plainer in character. It is Grade II\* listed for its more than special interest.

The setting of the church is compromised by a variety of large-scale modern developments in close proximity to it. These generally detract from its presence, particularly by

framing, and competing with, the church tower as an intended focal point as viewed from Bishopsgate.

c) The Church of All Hallows London Wall

This important church is located nearby to the west of the development site. It is notable as the first building by George Dance the Younger, built 1765-7 to replace a medieval church built up against the City wall. The exterior is generally restrained but has an elaborate west tower which culminates in a circular cupola, with a dome supported by a ring of delicate Corinthian columns. The interior is of particular note, and later influenced Dance's pupil, Sir John Soane. It is Grade I listed indicating its exceptional interest. Like St Botolph's church, its setting is compromised by modern development, which overshadows and dominates it in views looking east along London Wall.

d) Former Great Eastern Hotel

The hotel is located to the east of the development site. It was designed by Charles Barry Jr and his son Charles Edward Barry, and later extended by Colonel Edis and Maples. It is listed at Grade II\*, for its architecturally accomplished exterior which acts as a frontispiece to Liverpool Street Station, and its lavish interiors. Though the roof was raised and altered in the 1990s, the expressive roofscape and its silhouette contribute to its significance. Existing modern development competes with it as a landmark building, compromising its setting in a similar way to the churches described above.

e) St Paul's Cathedral

The Cathedral sits on the highest point in the City and the Grade I listed building is one of London's most famous landmarks. The rebuilding of the medieval cathedral was undertaken by Sir Christopher Wren from 1675-1710 in a baroque style. The dome has dominated London's skyline since, and it is seen among the many spires of Wren's City churches, which together have very strong group value. The dominance of the Cathedral has been eroded by modern development and views of the landmark have long been protected.

The proposals concern a distant view of the Cathedral from Waterloo Bridge, designated as the strategic view 15B.1 in the London View Management Framework. In this view, the

sky space immediately to the right of the drum and peristyle supporting the dome, has been eroded by a tall building development at 9 Frying Pan Alley (aka the Nido Tower), built c.2007. This has resulted in clear harm to the significance of the Cathedral by diminishing its prominence on the skyline.

#### Impact of the proposals

The proposals are for the clearance of the site above ground, aside from the listed former bath house, and the construction of a new tall building of up to 103.15m AOD. The building would be clad in pre-cast elements in a modular system, which give the elevations a strong grid-like appearance.

The revised scale and massing has been shaped by the potential impact in LVMF view 15B.1, with height parameters for the tallest part of the building established by the Nido Tower, which it would not exceed. The development site is closer to the viewpoint, which, alongside the proposed detailed design and materials, could result in a building with a slightly more distracting presence than the existing building.

The lower part of the proposed tower (at 89.105m and 87.12m AOD) would sit in front of the existing Dashwood House and appears to rise slightly higher than it as viewed from Waterloo Bridge. The further encroachment on the clear sky backdrop, and the proposed design, could additionally result in some harm.

The proposals would detract from the already compromised settings of the church of St Botolph and All Hallows, presenting a larger and more dominant building in comparison to their existing backdrops. In both cases, the churches as focal points would be diminished through the loss of clear sky and development which distracts from their pre-eminence. In the case of All Hallows, the proposals would rise much higher than its cupola in the backdrop. Its filigree detailing would also become harder to appreciate against the proposed façade.

The immediate setting of St Botolph's churchyard and the former bath house would change dramatically. The churchyard would become more enclosed, benefitting from less open sky and direct sunlight. The proposals would partly cantilever over the bathhouse kiosk, which combined



with the busy façade design compromising of a red tiled frontage and a distracting geometric pattern, would detract from an appreciation of its special architectural interest. We understand that the works to the bath house itself, to be dealt with in a subsequent listed building consent application, seek to improve on past unsympathetic repairs, with further details to be provided in due course.

The proposals would appear behind the roof of the Great Eastern Hotel as viewed from Bishopsgate. The proposals would further detract from the hotel's prominence in the townscape, causing some harm.

#### Relevant policy and guidance

The National Planning Policy Framework requires a robust and proportionate understanding of the significance of any affected heritage assets and for this to be taken into account in order to avoid or minimise harm from development proposals (Paras 194-195).

When considering proposals which impact the significance of designated heritage assets, decision makers are required to give great weight to their conservation (and the more important the asset, the greater the weight should be), and to be satisfied that any harm is clearly and convincingly justified (Para 199-201)

In each case the harm we have identified would be less than substantial and low in the range of such harm. Such harms would contribute to higher levels of cumulative harm arising from existing development within the settings of the listed buildings discussed. This harm should be weighed against the public benefits arising from the development as according to Para 202.

London Plan Policy HC2 requires that 'Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.'

London Plan Policies HC3 and HC4 concern strategic views and the LVMF. The latter policy requires that 'Development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views and, where appropriate...as seen from designated viewing places.'

The LVMF SPG (Mayor of London 2012) provides guidance specific to view 15B.1, stating that 'Consideration should be given to the space St Paul's Cathedral requires between it and tall buildings to maintain its visual prominence in the river prospect' (Para 266)

It also states 'Development should not dominate the peristyle, drum, dome or western towers of St Paul's Cathedral in the background of the view. Development that visually interacts with the dome in the immediate background should not diminish the viewer's ability to recognise and appreciate the Strategically Important Landmark' (Para 267).

The site sits partly within and partly outside of the Eastern Cluster policy area (Local Plan Policy CS 7), which allows for tall buildings where their architecture is of the highest calibre and they would not harm the City's historic environment or the wider London skyline.

#### Historic England's position

We welcome some of the changes that have been made since the pre-application proposals we last saw and commented on. The reduced impact in the strategic view of St Paul's Cathedral from Waterloo Bridge is positive, though some harm would remain. The closer proximity of the development, its detailed design and a further potential small loss of clear sky, arising from the lower part of the proposed tower, would not preserve or enhance the setting of the Cathedral in our view. This will require very careful consideration in light of the associated LVMF policies and guidance referred to above.

The local impacts to the churches and hotel we have described would be regrettable. Whilst the setting of these heritage assets is already characterised by the dramatic contrasts with existing modern development, many of these

relationships are negative, and the proposals would contribute to a further weakening of the ability to appreciate their significance.

The harm to bath house kiosk arises partly from the development cantilevering over it and from its detailed design. The latter is more easily resolvable - the kiosk would benefit from a much less distracting backdrop at the base of the proposed development so that it would remain prominent in its setting. We think it is also important that the kiosk has a clearer visual separation from the proposed development for the same reason. We recommend that you therefore seek amendments accordingly and we would be happy to provide further advice on this.

We have not yet seen the associated listed building consent and expect to see a clear conservation methodology which ensures that the opportunity to maximise the potential heritage benefits arising from its redevelopment are taken. It is unlikely that there would a better opportunity to secure the long-term conservation of the listed building if planning permission is granted.

#### Recommendation

Historic England has concerns about the proposals, which would result in harm to multiple highly graded listed buildings. We encourage you to seek amendments where this harm could be avoided or minimised, in accordance with the requirements of the Development Plan and NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we

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|   | <p>recommend that you seek their view as specialist archaeological adviser to the local planning authority.</p> <p>The full GLAAS consultation criteria are on our webpage at the following link:</p> <p><a href="https://www.historicengland.org.uk/services-skills/our-planning-services/greaterlondon-archaeology-advisory-service/our-advice/">https://www.historicengland.org.uk/services-skills/our-planning-services/greaterlondon-archaeology-advisory-service/our-advice/</a></p> <p><b>Agent Response:</b> The applicant engaged with Historic England to discuss the proposals. An Addendum Pack dated 29<sup>th</sup> September 2023 was submitted in response to the concerns raised.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p>  |
| <p>Network Rail<br/>26<sup>th</sup> July 2023</p> | <p>The site and proposed development are located in close proximity to London Liverpool Street Station. Network Rail is keen to support sustainable travel, and a high proportion of rail-based users is expected from the development. Network Rail agrees with the point raised within the Applicant's Transport Assessment that onboard train capacity can accommodate the demand, although we do believe that the calculation that results in the 5-user per service calculation is oversimplified. Network Rail would expect a higher portion of users to be Liverpool Street Station based versus Moorgate. This is due to the closer proximity of Liverpool Street Station and the more varied train services provided at the station.</p> <p>Whilst Network Rail supports that on-board train capacity is suitable, the ability of Liverpool Street Station to absorb the additional patronage appropriately will be challenging. Liverpool Street Station has several known capacity-based issues resulting from significant development around the station, primarily:</p> <ul style="list-style-type: none"> <li>• morning peak hour gate line capacity issues;</li> <li>• evening peak concourse capacity issues (exacerbated by un-planned rail or underground rail disruption)</li> <li>• peak hour capacity constraints with vertical circulation between lower concourse and street level.</li> <li>• significant challenges for users with additional accessibility needs through all hours of the day.</li> </ul> |

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|   | <p>As such, while the Applicant's Transport Assessment presents the additional user numbers to be negligible/minimal, it is Network Rail's view that with the numbers presented, they will be notable within the context of the station environment and would be expected to worsen the already known issues. In addition, given the layout of the interconnected stations, there would be an expectation for a number of users who present as Elizabeth or tube line users to also choose to use the Liverpool Street station estate. Particularly in the context of the significantly larger TfL Ticket Hall B, direct route for Central line users via Ticket Hall C and peak hour Elizabeth line trains that arrive/depart Platforms 16-17 in the Liverpool Street station.</p> <p>Whilst Network Rail has no objection to the proposed development, we are keen to discuss the challenges highlighted above in more detail with the City of London. We would like to work collaboratively with the City of London and identify the best approach to ensuring that the challenges posed by developments of this nature are appropriately mitigated.</p> <p>Network Rail's Asset Protection Feedback</p> <p>Network Rail strongly recommends the developer contacts the Asset Protection Team <a href="mailto:asproanliage@networkrail.co.uk">asproanliage@networkrail.co.uk</a> prior to any works commencing on site, and also to agree an Asset Protection Agreement with us to enable approval of detailed works. More information can also be obtained from our website <a href="https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/asset-protection-and-optimisation/">https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/asset-protection-and-optimisation/</a></p> |
| <p>London and Middlesex Archaeological Society<br/>1<sup>st</sup> August 2023</p> | <p>The London and Middlesex Archaeological Society (LAMAS) promotes London's archaeology, local history, and historic buildings. The LAMAS Historic Buildings and Conservation Committee reviews planning applications relating to important historic buildings and seeks to ensure a sustainable future for vital aspects of London's built heritage.</p> <p>We have serious concerns over the adverse impact of the proposed new building on the setting of the Grade II-listed Bath House, which is also the subject of alterations in the planning application. Even the image on the front of Design and Access Statement (Part 1) makes it clear that the Bath House would be overwhelmed by the cantilevered first floor of the new building, drastically impacting its setting.</p>   |

We note that there is not yet an Application for Listed Building Consent on the City of London planning website. The planning application was validated on May 15, and the Planning Statement states (1.15) '*Alongside this planning application, an application for Listed Building Consent (in relation to the Bath House works) and an application for Scheduled Monument Consent (in relation to London Wall remains) will be submitted. For clarity, these are due to be submitted after this application for planning permission is submitted*'. We are now two and a half months from validation of the application and we have yet to see the LBC.

Without the LBC Application, which is required given the heritage assets affected, it is scarcely viable to make a complete assessment of the impact of the proposed works on the nearby heritage assets. We therefore ask the planning officer to request the submission of this LBC Application so that documents such as the Heritage Statement can be posted, and that adequate time is allowed for inspection of these documents before any decision is made.

The Planning Statement (section 5.41) states '*The Proposed Development is acceptable when considered against the NPPF and relevant Development Plan policies and guidance, including that published by Historic England and the GLA, given that it avoids any harm to the setting of relevant heritage assets and, moreover, results in heritage benefits to the listed Bath House on site*'. Under the current application there is no adequate justification for this claim.

We agree with The Victorian Society's letter of objection dated 12 July which states, inter alia, that '*The combined proximity and scale of the proposed 23-storey building demonstrate a staggering lack of deference to the significance of this Grade II listed building. The building would dwarf and overshadow the heritage asset by partially cantilevering over it, essentially engulfing the building in an artificially lit, cave-like space. The ability to appreciate the outline of the lantern, a crucial architectural feature of the bath house meant to be seen in silhouette against the sky, would be greatly reduced*'.

**Officer Response:** Addressed in the Design and Heritage section of the report.



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| <p>SAVE Britain's Heritage<br/>27<sup>th</sup> September 2023</p> | <p>SAVE Britain's Heritage objects to the above planning application for 55 and 65 Old Broad Street on the grounds that this proposal would cause substantial harm to the Grade II listed former bath house (8 Bishopsgate Churchyard) within the application site, and less than substantial harm to the setting of several surrounding listed buildings. Furthermore, as the site sits between two conservation areas, New Broad Street and Bishopsgate, this proposal would negatively impact views into and out of these important heritage assets. SAVE also objects to the total demolition of 55 Broad Street on climate grounds. For these reasons, this application fails to comply with national and local policy for preserving the historic and natural environment of the City of London, and so we call on the Local Planning Authority to refuse planning permission.</p> <p>Proposal</p> <p>This application proposes the total demolition of 55 Old Street, the link bridge over Wormwood Street and the southern and northern ends of 65 Old Broad Street, and the construction of a new 23-storey building.</p> <p>Significance</p> <p>Within the application site lies 55 Old Broad Street, designed by Ley, Colbeck &amp; Partners in the 1970s. The office building features a podium of brown granite above which rises a building with smoked-glass curtain walling. It partially lies above the Scheduled Ancient Monument of the Roman wall. The Grade II listed former Turkish baths are also located within this application site, built in 1894-5 to designs by Harold Elphick in an Islamic style. It is lavishly decorated with faience tiles and a terracotta entablature. These baths remained in use until the 1950s and remain a highly significant example of this building type. The application site lies within the setting of multiple designated heritage assets, which notably include St Paul's Cathedral, the Church of St. Botolph-without-Bishopsgate, the Church of All Hallows London Wall and the Great Eastern Hotel. Grade I listed St Paul's Cathedral is a building of the highest historic significance and is a celebrated landmark recognised both nationally and internationally. To the east of the site, is the Grade II* listed church of St Botolph-without-Bishopsgate which was designed in 1725-29 by James Gould. To create a prominent landmark on Bishopsgate, the church's tower is placed at its East End</p> |

making it unique amongst the City churches. The churchyard abuts the application site and is of very high significance as the first example of a burial ground repurposed as a public garden, as permitted by the Burial Act of 1852. Also within the setting of the application site is the Church of All Hallows London Wall. This church is historically significant as one of George Dance the Younger's earliest designs, built 1765-7. Dance's new design was on the site of a 12th century medieval church which sat against the old Roman Wall. Its Grade I listing reflects this architectural importance. The site sits between two conservation areas, New Broad Street and Bishopsgate. Bishopsgate is defined by its dense urban grain with low scale buildings. A prominent feature within New Broad Street is the west tower of the Church of All Hallow which terminates in an elaborate cupola. The significance of these designated assets - both individually and collectively within this intimate setting - is strongly affirmed by letters of objection submitted against this application by the Georgian Society, Victorian Society and comments from both Historic England and 281 members of the public.

#### Our Assessment

We object to this proposal on the following grounds:

1. This proposal would cause substantial harm to a designated heritage asset, the former Turkish Bath Houses. When considering the impact of a proposed development, Para 199 NPPF (2023) requires that the LPA gives greater weight to the conservation of a heritage asset. Further to this, Para 200 NPPF (2023) provides that any harm to the significance of a heritage asset [including its setting] requires clear and convincing justification. SAVE considers the applicant's reasoning that design details (such as geometric pattering of the lower level's façade and red cladding) would mitigate the impact of this proposed development on the bath house to be insufficient justification to comply with para 200. On the contrary, we consider such details would compete and diminish the primacy and appreciation of the bath house and its setting. The vastly increased scale and proximity of the proposed office block to the

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|  | <p>bath house, with its drastic cantilever, would only compound this harm. The resulting loss of light would make the historic building's significance less appreciable. For these reasons, SAVE considers this application would cause substantial and unjustified harm as defined by the Framework.</p> <ol style="list-style-type: none"><li>2. Considering such concerns, the absence of any Listed Building Consent for this proposal is alarming. This absence suggests inadequate consideration has been given to the heritage impacts of the proposal, especially given the number and varied types of harm posed to so many heritage assets.</li><li>3. The visual impact of this development would also cause less than substantial harm to the three listed churches identified above. Para 202 NPPF (2023) requires that this harm should be weighed against the public benefit of the proposal. A key benefit used to justify this demolition application is the provision of 'new high-quality and flexible office space'. However, we would argue that given the site already provides such a use, little or no significant weight can be attached to such a benefit. Therefore, we do not consider the purported public benefits of the scheme to outweigh the harm to the setting of these heritage assets.</li><li>4. The application's Planning Statement proposes that a further public benefit of the development would be the creation of a 'new low carbon office building'. SAVE would contest such a claim on the basis that there has been entirely inadequate consideration of the possibility of the re-use of this building. This proposal entails radical demolition which would generate an embodied carbon footprint on a scale that runs counter to Para 152 NPPF (2023) and Policy CS15 of the London Local Plan (2015) which both place great importance on the 'reuse of existing buildings'. We also note the City Corporation's evolving policy in relation to draft City Plan 2040 - Carbon Options Guidance (COG) planning advice note (adopted by the Planning and Transportation Committee in March 2023) – highlights the necessity for retrofit retention</li></ol> |
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|  | <p>and refurbishment to be considered alongside any proposals for redevelopment. For these reasons SAVE considers that this demolition cannot be justified as constituting sustainable development as defined by City of London and NPPF policies.</p> <ol style="list-style-type: none"><li data-bbox="687 416 1390 1032">5. As the application site sits between two conservation areas, New Broad Street and Bishopsgate, this proposal would negatively impact views into and out of these conservation areas. The statutory duty as provided by section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that the local authority should give special regard to the desirability of preserving conservations areas. At 23-storeys, this proposal would be considerably taller than the existing 55 Broad Street. The increased scale and massing of this building therefore threatens prominent views within these two conservation areas. On this basis, the proposed development should be considered unnecessarily harmful.</li><li data-bbox="687 1043 1390 1659">6. The application site sits only partly within the Eastern Cluster and contravenes the City of London Local Plan (2015) concerning tall buildings. Policy CS14 of this plan provides that proposals for tall buildings which would affect the significance of heritage assets and their settings are not suitable. Policy CS7 further affirms that this development is not justifiable as it requires that the development of tall buildings within the Eastern Cluster adhere to the principles of the 'conservation of heritage assets and their settings'. The application site's proximity to the Easter Cluster does not justify a building of 23-storeys which would adversely impact the settings of multiple designated heritage assets.</li><li data-bbox="687 1671 1390 1951">7. This development would be visible behind the dome of St Paul's Cathedral as viewed from Waterloo Bridge, which has been designated as the strategic view 15B.1 in the London View Management Framework (LVMF). This development would move the cluster of tall building's closer to St Paul's when regarded from viewpoint 15B.1 and impede on its</li></ol> |
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relationship to the backdrop of sky. This directly conflicts with policy regarding the protection of Strategic Views in London as set out in the LVMF SPG (Mayor of London 2012), and if approved, would set a dangerous precedent for the gradual erosion of these policy protections.

#### Conclusion

For the reasons outlined above, SAVE objects to this planning application on heritage and climate grounds, and we call on the Local Planning Authority to refuse planning permission. I trust that these comments are useful to you, and I ask that you keep SAVE informed of further decisions or consultation regarding this application.

#### Agent Response:

The SAVE Britain's Heritage comments of 26<sup>th</sup> September broadly echo comments made by consultees and which the Applicant has already responded to, namely:

- Alleged substantial heritage harm to the Bath House.
- Lack of application for listed building consent.
- Alleged less-than-substantial heritage harm on three listed churches.
- Impact on setting of New Broad Street and Bishopsgate Conservation Areas.
- Querying site location relative to the Eastern Cluster, and therefore the acceptability of a tall buildings.
- Visibility relative to St Paul's in LVMF views (albeit they state the scheme is visible behind the dome of St Paul's in 15B.1 – which is not true).

They do, however, raise the following matters which are different, and whilst picked up in the submission material are directly addressed below.

1. Loss of light to the Bath House would make its historic significance less appreciable.
2. Provision of new high-quality and flexible office space should be given little or no significant weight against heritage harm as the site already provides such a use.
3. Inadequate consideration of the possibility of re-use of this building, with respect to embodied carbon.

In respect of 1., the Bath House has always been located within a densely developed area where light to it would have

been limited in this urban context. The development will not materially reduce the light to the north and east façades which are the most richly decorated and which will be enhanced. The development will not reduce the light to the interior, including (most obviously) the basement level which is the most richly decorated internal area of the building. Moreover, pavement lights are proposed to bring natural light into the basement. The lantern to the kiosk is purely decorative, does not create any additional light into or outside the building. Future building investigations will establish if this can be used to illuminate the stair, alongside improvements to the basement lighting through the proposed introduction of pavement lights.

On 2., the existing building does not come close to meeting the quality, amenity, or sustainability requirements and expectations of the current and future office market. The new 55OBS building offers a range of modern, flexible floorplates, designed to meet important demand in financial services, technology, media, legal, and other professional sectors in this part of the City, reinforcing the important role of the City of London as a global centre for these industries. The increase in office quality, uplift in office floorspace, direct investment, construction and end-use jobs represent substantial economic benefits. Further socio-economic benefits are brought about by the creative and community uses in the retained 65OBS and the Bath House. In so far as the proposed floorspace delivers core policy objectives, as set out in the Development Plan, significant weight should be afforded to them as part of the planning balance exercise.

On 3., Save do not clearly acknowledge the fact that the 65OBS portion of the existing building is proposed to be largely retained, as is the existing basement across the Site. The decisions to retain these were based on a rigorous (and peer reviewed) WLCA optioneering process, factoring in both embodied and operational carbon, as well as other sustainability and masterplanning objectives, in line with adopted CoL guidance and emerging policy.

**Agent Response:** An Addendum Pack dated 29<sup>th</sup> September 2023 was submitted in response to the concerns raised.

**Officer Response:** Addressed in Design and Heritage section of report.



Surveyor to the  
Fabric of St Pauls  
11<sup>th</sup> August 2023

## Introduction

Further to a review of the application documents, a post-submission meeting with the applicant, and previous pre-application consultation, I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the emerging proposals for a tall building at 55 & 65 Old Broad Street. As at pre-application stage, the Cathedral wishes to register concern about this application in relation to potential impact of the scheme on the heritage value of the Grade I listed Cathedral building and its status as a Strategically Important Landmark, in particular through the alteration of key views identified in the LVMF.

## Consultation with the Cathedral

A pre-application consultation was held with the applicant and supporting project team on Tuesday 10th January 2023. We registered a number of concerns during the meeting, mainly in relation to the overall height and massing of the proposals as evident in key views of the Cathedral, the extent of use of Nido Tower as “background shadowing” (including the BMU to the roof of Nido) and the suitability of the development site for tall buildings given wider heritage and visual impact. Following the submission of the scheme, a further consultation meeting was held in July to discuss design changes that occurred since our last comment.

## Policy Context

A number of key policies are relevant to this proposal in relation to the Cathedral. These are drawn from the adopted City of London Local Plan 2015, the London Plan 2021, and the National Planning Policy Framework. We have also given consideration as to the emerging draft London Plan 2040. Whilst a broad range of policies are relevant, particular consideration is given to those concerning protection of the historic environment and tall buildings.

The key policies relevant to the impact of the emerging proposals on the Cathedral are summarised below: City of London Local Plan 2015:

- Core Strategic Policy CS10: Design
- Policy DM 10.1 New Development
- Policy DM 10.4 Environmental Enhancement
- Core Strategic Policy CS12: Historic Environment

- Policy DM 12.1 Managing change affecting all heritage assets and spaces
- Core Strategic Policy CS13 Protected Views
- Core Strategic Policy CS14 Tall Buildings

One of the particular points of emphasis within the Emerging City of London Plan 2040 – and as directed by the GLA – is the correct and suitable placement of tall buildings. The spirit and detail of these emerging policies therefore has some weight and relevance for this application.

The London Plan 2021:

- Policy D1: London’s Form, character and capacity for growth
- Policy D4: Delivering Good Design
- Policy D9: Tall Buildings
- Policy HC1: Heritage Conservation and Growth
- Policy HC3: Strategic and Local Views
- Policy HC4: London View Management Framework

National Planning Policy Framework:

- Chapter 12: Achieving well designed places
- Chapter 16: Conserving and enhancing the historic environment

The City’s Protected Views SPD 2012 and the wider London View Management Framework SPG 2012 are also of relevance.

#### Key Issues and Concerns

We note that, since pre-application discussion, the applicant has revised the proposals to lower the height of the scheme, dropping the overall height of the proposals to that of Nido Tower as appreciable in key views. This is a positive step, and alleviates a number of our concerns as expressed at pre- application stage. We do, however, retain a number of concerns around the scheme which have the potential to cause adverse visual impact and tangible and permanent heritage harm.

#### Suitability for Location of Tall Building

We remain sceptical that the development site is a suitable location for a tall building, as outlined within our pre-application response to the applicant. While we welcome the reduction in height of the scheme to correspond to that of Nido, we would re-iterate that the proposals would appear

closer to the viewer than Nido (in views such as LVMF view 15B.1 – see below) and thus appear more prominent. While the project team have attempted to mitigate this through form and materiality, it still has implications and impacts, discussed below.

#### Height of Lower Element of the Scheme & Erosion of the Skygap

While the overall height of the scheme has been lowered, the “lower element of the scheme”, presumably the roof terrace area and the recessed floor above, does visually erode the sky visible to the right hand side of the Drum in LVMF view 15B. 1, and likely a kinetic sequence along Waterloo Bridge.

We acknowledge this erosion is minor and best appreciated with a telephoto lens. We do not accept the use of ‘technical visibility’ as a linguistic way to diminish the described effect of this change. The change IS harmful and encroaches on the sky space to the drum of the dome. We also appreciate the efforts of the project team to explain this change during post-submission discussion. However, it is incredibly disappointing that this erosion is proposed, given the utmost importance and visual significance of the skygap to both the composition character of key strategic and local views and the heritage significance of the cathedral. This importance was noted to the applicant during pre-application discussion. This skygap is a key focus of the policy aims described in the protective goals of protective views regimes.

#### Impact

The erosion of the skygap is contrary to the guidance within the City’s Protected Views SPD 2012 which states ‘There is a clear gap on the skyline between the Cathedral and the cluster, which it is important to retain.’ This erosion would be visible from a strategic view 15B.1 and, to our understanding, is therefore contrary to LVMF guidance, which states that new development should be of ‘a height appropriate to their site’ and ‘preserve or enhance... the Cathedrals relationship with its clear sky background’. This proposal causes adverse visual impact.

We record that, in pre-application and post application discussions with the project team, we asked for there to be an evaluation of a ‘no harm’ option of the scheme. We also

asked for the portion of the proposed building which causes this harm to the skygap to be clearly identified so that Officers can report on whether a reasonable approach could be proposed to remove the harm entirely. We do not believe that this 'no harm' option can be found in the application and we would urge Officers, as part of their evaluation of the scheme to require provision of this evidence (and absolute clarification of the areas of the building causing this impact, as inferred from the additional information issued to the Cathedral by the project team) so that it can be displaced to the decision makers. As we see it, the development - which is already of a much greater scale than the current context - does not need to press for an envelope which causes adverse impact, and planning committee should be made aware. We also note that there appear to be ways to remove this impact altogether by designing out a small portion of one floor on the lower-shoulder of the proposed tower (see below for further information on the reduction of impact).

In addition, while the main element of the proposals is lower than presented at pre-application stage, the scheme will still be closer to the viewer than Nido. It will thus be more prominent, and potentially more visually associated with the cluster than more distant development of Nido beyond. We therefore feel that the scheme does not align with the City's guidance on protected views, which states 'new development and the redevelopment of existing tall buildings should aim not to worsen and, where possible, to improve the backdrop to the view'. Furthermore, LVMF guidance for view 15B.1 also specifically states that new proposals should 'preserve and enhance the composition of the view...' and, within the background to the policy, note 'Consideration should be given to the space St Paul's Cathedral requires between it and tall buildings to maintain its visual prominence in the river prospect.' We are aware that alterations to the setting of a heritage asset does not always equate to heritage harm. However, the skygap, and the visual distinction between the Cathedral and the cluster, is also key to appreciating the heritage significance of the Grade I listed building. The visual prominence of the cathedral, preserved by its silhouette and distance from the cluster, contributes to an understanding of its architectural and historic special interest. The erosion of the skygap and worsening of Nido in the view therefore clearly equates to heritage harm. Given the Grade I listed nature of the building, this harm should be given great weight in the decision making process.

In line with policy and guidance, any harm to the significance of a heritage asset should first be mitigated and then must be justified. Indeed, given the alteration of a characteristic of these views such as the sky gap, we would expect alternate options to have been explored to avoid or minimise this impact. As we understand it (and as noted above in reference to the skygap), the harm can be removed by designing out a small portion of one floor on the lower-shoulder of the proposed tower. How is it not possible to consider this a priority, otherwise the application is not preserving or enhancing the contribution of setting to the significance of the Cathedral?

In recent years we have noted the incremental harmful alteration of parts of the setting of the Cathedral, both within its immediate setting (for example within the St Paul's Heights area) and within its backdrop as the tall buildings cluster to the East grows ever taller and more extensive.

We acknowledged that these, often minor, impacts are understood on a case by case basis (even allowing for cumulative impact). However, we feel that planning decisions should acknowledge the incremental harm that subsequent consents cause to the Cathedral in the long term. We would invite officers to consider this concern and prominently flag this encroachment and harm to the decision makers as part of the cumulative impact of a scheme.

#### Interpretation of Harm

Whilst outside direct locus of the Chapter of St Paul's, we seek to bring Officers' attention to the assessment undertaken for other heritage assets elsewhere to better understand how the applicant has arrived at a position of reporting no harm to the Cathedral. We disagree with their evaluation. It appears to us that this is also illustrated – and therefore should also heighten Officer's critical scepticism - by the evaluation of 'no heritage harm' which the evaluation indicates in relation to the significance of heritage assets such as St Botolph's Church. This is an interpretation that Officers should be very wary of, as it effectively justifies change through arguing that it is in line with the prevailing character of the setting of the listed building. In the case of the setting of both St Botolph and St Paul's, we would argue that the proposals do actively worsen the existing situation rather than simply being in-line with the existing character. Thus we suggest that Officers should recognise these impacts for what they are, which is tangible heritage harm.

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|  | <p>Conclusion</p> <p>The Cathedral wishes to register a high degree of concern about this application in relation to potential impact of the scheme on the heritage significance of the Grade I listed building, its status as a Strategically Important Landmark and contribution to strategic views, and its impact in local views.</p> <p>We wish to reiterate that we welcome the proactive approach taken by the applicant, both in pre-application discussion, and through design changes to respond to a number of our previous key concerns. We also welcome the additional information produced by the project team for our benefit, and the spirit in which they have conducted post-submission dialogue.</p> <p>Nonetheless, the scheme would worsen an already (and widely acknowledged) harmful element of the setting of the cathedral (Nido Tower). The proposals would also cause an erosion to the skygap that is crucial to the City's skyline, key views, and the significance of the Grade I listed Cathedral. We would hope these factors are given great weight in the decision making process, as required by the letter and spirit of policy and guidance. If possible, we would recommend that the applicant revisits the design to further mitigate impacts.</p> <p>We hope that this is a consultation response which strengthens the relationships and common aims of City and the developers.</p> <p><b>Agent Response:</b> An Addendum Pack dated 29<sup>th</sup> September 2023 was submitted in response to the concerns raised.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p> |
| NATS<br>4 <sup>th</sup> October 2023                     | No objections  |
| Heathrow<br>Safeguarding<br>5 <sup>th</sup> October 2023 | No safeguarding objections to the proposed development.  |
| Historic England   | Thank you for your letters of 15 September 2023 and 03   |



5<sup>th</sup> October 2023

October 2023 regarding the above applications for listed building consent and planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the applications.

### **Historic England Advice**

This letter captures our response to the Listed Building Consent application and the re-consultation on the amended associated planning application, which we have already provided detailed advice on (letter dated 20 July 2023).

Regarding the latter, we welcome the adjusted balustrade detail, which would help to minimise any harm arising to St Paul's Cathedral in the LVMF view from Waterloo Bridge. You may also wish to consider conditions and/or require a building management plan which would prevent the introduction of rooftop clutter associated with the use of the roof terrace, which could contribute to an adverse impact.

The focus of this letter are the impacts on the listed former Turkish baths at 7-8 Bishopsgate Churchyard, and its setting, as set out below.

#### Significance of the heritage asset

The baths were designed by S. Harold Elphick in the 1890s in an elaborate Islamic style. Originally, the small above ground kiosk formed part of a parade of shops on Bishopsgate Churchyard - effectively an appendage to a larger commercial development (New Broad Street House) - providing access to larger spaces below ground. Both feature elaborate tile work and faience, creating an intense decorative scheme. The ingenuity of the design, which makes the most of a very cramped site, was praised at the time of its construction.

The baths closed in the mid-twentieth century and much of the interior was lost when it was converted to use as a restaurant. Nevertheless, a considerable amount of good quality tilework and faience survives, and investigative works might reveal more internal features, once this is possible. The below ground space might have originally been lit by natural daylight - possibly by stall board lights on the shopfronts above, and certainly later by pavement lights.

The redevelopment of the wider site in the 1970s resulted in

radical change to exterior of the kiosk and its immediate environment. The demolition of New Broad Street House resulted in the kiosk acquiring two new elevations to the south and west. The kiosk was partly remodelled in consequence, with new elevations which allude to the original design relatively successfully, though the materials used are not of the same quality. A small section of the eastern elevation of the New Broad Street House survives with white glazed tiles and is the last vestige of the kiosk's original relationship with the cramped built environment it was designed around.

Despite later changes, the building is clearly of special architectural and historic interest and is Grade II listed.

#### Impact of the proposals

The proposals would see the reuse of the baths as a community, cultural and private events space, potentially in collaboration with the Guildhall School of Music and Drama.

We have identified some harm arising from the relationship of the proposed tall building, which would partly over sail the kiosk, diminishing its street presence. We have also previously identified some harm arising from the proposed treatment of the public realm immediately around the kiosk. The amendments to the scheme related to the latter have moved in the right direction in simplifying the patterned surface treatments, but we think that the proposals would still detract from an appreciation of its significance, primarily because the kiosk would still appear as a somewhat marooned object, rather than being integrated with the street.

A light weight glazed link would be added to the rear of the kiosk, connecting it with the foyer of the proposed office block, and would provide level access to the remainder of the baths, and provide a new café. Locating the lift outboard of the baths original footprint minimise the loss of the historic fabric and planform and is sensitive to significance in this regard.

The provision of the café in the glazed link would necessitate the demolition of the surviving wall of New Broad Street House. This would result in harm by eroding any remaining legibility of the baths historic setting and the particular design constraints that Elphick had to work with in realising his highly distinctive design.

The proposed demolition and recreation of the twentieth century parts of the kiosk is generally sympathetic and if executed in materials of the same quality as the original Victorian elements, would introduce greater coherence, thereby improving its appearance.

The proposed internal alterations are generally minimal and unlikely to affect historic fabric, but further investigative work would be necessary in order to understand this fully.

#### Relevant policy and guidance

The National Planning Policy Framework (NPPF) requires a robust and proportionate understanding of the significance of any affected heritage assets and for this to be taken into account in order to avoid or minimise harm from development proposals (Paras 194-195). When considering proposals which impact the significance of designated heritage assets, decision makers are required to give great weight to their conservation. Decision makers should be satisfied that any harm is clearly and convincingly justified and outweighed by the delivery of public benefits (Paras 199-202).

NPPF Para 134 requires that developments should be sympathetic to local character and history, and development that is not well designed should be refused permission, especially where it fails to reflect local and government design guidance. Related to this, the National Design Guide (2021) emphasises the importance of heritage and context when considering the merits of a design. These points are reinforced in London Plan Policies D1, D3, D9 and HC1 in particular. These related policies rely on a design-led approach for optimising sites, to ensure that the form of the proposed development responds to a site's context and capacity for growth, including through identifying and avoiding harm to heritage assets.

#### Historic England's position

We welcome the repair and reuse of the listed baths. Providing the listed building with a long-term sustainable future has the potential to be a meaningful heritage benefit which should be secured through condition or obligation. We encourage you to ensure that a good level of public access is achieved and safeguarded.

We continue to have reservations about the impact of the wider development on an appreciation of its significance. A

more satisfactory relationship could be achieved without significantly affecting the proposed quantum of development, by cutting back the fourth and fifth levels slightly so that the kiosk would retain a greater degree of breathing space. We encourage you to explore this as means of minimising harm to significance.

A clearer strategy that enhances an appreciation and understanding of the baths significance is required for the proposed changes to the public realm. This could include illustrating the lost historic street pattern in the pavement - particularly because this was so central to the way the baths were designed. Related to this, whilst we have no concerns with introducing roof lights to the subterranean spaces of the baths in principle, this could be limited to their northern perimeter, to help illustrate the original arrangement, both internally and externally.

We are generally content with the proposed interventions to the listed building, including the glazed link. However, we do not support the demolition of the surviving part of New Broad Street House, given the harm this would cause. We recommend that the proposals should be amended to incorporate it.

More generally, we think the proposals represent a missed opportunity to secure more compelling heritage benefits. This is a rare opportunity to restore a unique building and improve the legibility of what makes it special. The proposed external works are welcome but have limitations as an enhancement of significance given that it would primarily affect modern parts of the building. A much clearer enhancement of significance might involve the restoration of some of the interior spaces, particularly where missing components of the elaborate decorative scheme could be reinstated in an authentic way.

### **Recommendation**

Historic England has concerns on heritage grounds. We recommend that you seek amendments to avoid or minimise harm to significance, and enhance it, particularly in respect of the immediate setting of the kiosk, and a clearer restoration strategy for the interior spaces.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we

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|   | <p>recommend that you seek their view as specialist archaeological adviser to the local planning authority.</p> <p><b>Agent Response:</b></p> <p>A Heritage Strategy was provided which sets out the conservation and repair strategy for works to the Bath House.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p>  |
| <p>Crossrail<br/>6<sup>th</sup> October 2023</p>                  | <p>Conditions suggested.</p> <p><b>Officer Response:</b> Conditions appended.</p>   |
| <p>London City Airport<br/>10<sup>th</sup> October 2023</p>       | <p>No safeguarding objections to the proposed development.</p>  |
| <p>Twentieth Century Society<br/>13<sup>th</sup> October 2023</p> | <p>The Twentieth Century Society has been notified of the above application for the total demolition of 55 Old Broad Street, the link bridge over Wormwood Street and the partial demolition of 65 Old Broad Street, and the construction of a 23-storey building. As the National Amenity Society concerned with the conservation of post-1914 architecture and townscape, our interest here is the post-war architecture within the application site. We defer to Historic England and to the Georgian Group, Victorian Society and SAVE Britain's Heritage for comment on the scheme's impact on nearby designated heritage assets.</p> <p>The application site includes Broad Street House, which was built in 1972-77 by Ley, Colbeck and Partners. A raised walkway connects to the building at podium level and bridges Wormwood Street. This was part of the system of elevated walkways built from the mid-1960s which extended around the City of London. These pedways were part of the post-war redevelopment of the City which had been devastated by bombing in WWII. Car-ownership and travel increased in the 50s and 60s and this was catered for in the post-war plan, but with it came the need separate pedestrians from street-level traffic. The pedways provided this separation and offered high-level walkways which threaded through the City's architecture. While an entire network of pedways was planned, only a fraction was built and much of which has been demolished. A few fragments remain, mostly north of London Wall (the section within the Barbican Estate is listed). This walkway over Wormwood</p> |

Street is therefore an important and rare survivor of this post-war urban design feature in the City.

The Society asks the City of London to identify the bridge link as a Non-Designated Heritage Asset. It is within the City's power to do so now – as outlined in Planning Policy Guidance, “local authorities may [...] identify non-designated heritage assets as part of the decision-making process on planning applications”. Identified as such, paragraph 203 of the National Planning Policy Framework would apply. This asks that “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that [...] 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.”

The Society considers the pedway to have high significance as an increasingly rare and idiosyncratic feature of the post-war urban landscape of the City. Its heritage significance should be recognised and it should be conserved and incorporated into any proposed redevelopment of the site. While it may no longer provide a key pedestrian route through the City, the walkway has clear heritage value and creative use could be made of it, as happened in 2018 when it hosted the [Bridging Home sculpture by artist Do Ho Suh](#). The Society objects to the application in its current form due to the proposed complete loss of the elevated walkway. We hope that these comments are of use to you. We would be grateful if you could inform us of your decision on this application.

**Agent Response:**

The City of London proposed a series of high-level walkways as part of the post-war reconstruction of the City. These were first proposed in the 1947 plan for the rebuilding of the City and carried forward to later iterations, with a local act in 1967 requiring new developments to include these high level walkways. Their intention was to provide segregation between pedestrians and motor vehicles and a comprehensive network of routes within the City, allowing pedestrians to safely travel through the city at a high level. This was first implemented at London Wall but, despite the ambition of the scheme, only a fraction of the originally planned walkways were ever created. These were often disjointed sections, which did not create a wider network,



leading to the walkways becoming underused with many of those that were originally constructed later demolished. Those remaining are remnants of a time where city planning devoted street space to vehicles and saw pedestrians and cyclists as secondary. Removing it is in line with modern day objectives of healthy streets for people.

The walkway over Wormwood Street provided a north-south link from Liverpool Street towards Leadenhall Market and the Bank of England. It is an isolated fragment of the wider intended walkway network and has no public access and no current function, save for its use as part of a fire escape. This is acknowledged by the C20 Society.

For a structure or building to be recognised as a “heritage asset” (as defined by the NPPF) it must display historic, architectural, artistic or archaeological interest. Historic interest may arise from association with a particular person or event, and may also be drawn from the rarity of a structure. With regard to the footway, it is accepted that the footway is a rare surviving feature of the wider footway network originally envisaged as part of the post-war rebuilding of the City. However, this rarity, and the lack of current function, reflects the failure of this original vision and means that the walkway is largely experienced as devoid of any wider context, while the intended function of the structure, as part of a wider network, is not appreciable. This contrasts with the surviving walkways at the Barbican (which do form part of the Grade II listing of the complex) which form part of an integrated estate and provide links between buildings and community facilities, allowing the original vision and intention of the walkways to be understood.

The walkway at Wormwood Street is therefore an isolated fragment of the originally intended walkway network, with any historic interest it may possess considered to be extremely limited due to its lack of function and wider context. Its architectural interest, which would have been intrinsically linked with the intended function, is also limited and the structure is not therefore considered to be a non-designated heritage asset as defined by the NPPF. Moreover, the walkway itself partly blocks views of the New Broad Street Conservation Area and the All-Hallows on the Wall Church from vantage points along Wormwood Street and Bishopsgate. Removing it would better reveal these designated assets.

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|  | <p><b>Agent Response:</b> The walkway is owned by the City of London Corporation and the developer will (with the City's consent) demolish it as part of its development works. It is not within the adopted highway so the works do not fall under a Section 278 Agreement.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p>   |
| <p>Environment Agency<br/>18<sup>th</sup> October 2023</p> | <p>No objections.</p>  |
| <p>TFL<br/>20<sup>th</sup> October 2023</p>                | <p>Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to London Underground railway infrastructure.</p> <p>Therefore we request that the grant of planning permission be subject to the following separate numbered conditions to be discharged in a phased manner as and when they are completed.</p> <ol style="list-style-type: none"> <li>1. Before the pre-commencement/Site formation/Demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority. <ol style="list-style-type: none"> <li>a) provide an overview of the overall development including both design on temporary and permanent works.</li> <li>b) provide demolition details</li> <li>c) accommodate the location of the existing London Underground structures</li> <li>d) accommodate ground movement arising from the development construction thereof</li> <li>e) mitigate the effects of noise and vibration arising from the adjoining railway operations</li> <li>f) provide details on the use of tall plant/scaffolding for the demolition phase</li> <li>g) No claims to be made against TfL or London Underground by the Local Authority, purchasers, tenants, occupants or lessees of the development for any noise or vibration resulting from London Underground running, operating and maintaining the adjacent railway.</li> </ol> </li> <li>2. Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have</li> </ol> |

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|  | <p>been submitted to and approved in writing by the local planning authority.</p> <ul style="list-style-type: none"> <li>a) provide detailed design for foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent)</li> <li>b) site specific Risk Assessments and Method Statements (RAMS) for any activities (basement excavation, groundworks, piling) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing.</li> </ul> <p>3. Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.</p> <ul style="list-style-type: none"> <li>a) provide detailed design for all superstructure works (temporary and permanent)</li> <li>b) site specific Risk Assessments and Method Statements (RAMS) for any activities (craneage, scaffolding, use of tall plant) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing</li> </ul> <p>The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.</p> <p><b>Reason:</b> To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.</p> <p>We also ask that the following informative is added:</p> <p>The applicant is advised to contact TfL Infrastructure Protection in advance of preparation of final design and</p> |
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|   | <p>associated method statements, in particular with regard to: demolition; excavation; construction methods; tall plant and scaffolding.</p> <p><i>This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.</i></p> <p><b>Officer Report:</b> Addressed in the Highways section report, conditions and S106 Heads of Terms.</p>  |
| <p>Thames Water<br/>20th October 2023</p>                           | <p>Conditions Suggested.</p>  |
| <p>Historic Buildings and Places – 24<sup>th</sup> October 2023</p> | <p>Proposal: Refurbishment of the Bath House involving demolition of hard landscape slab and of 20th Century sections of the building above ground; ground floor extension to provide elevator shaft and cafe kiosk; external restoration, decoration and alteration including new accesses into the building; internal restoration, decoration and alteration including works to accommodate elevator shaft; new hard and soft landscaping including green roof and basement skylights; and exploratory works at basement level to facilitate further restoration activity.</p> <p>Statutory Remit: Historic Buildings &amp; Places (HB&amp;P) is the working name of the Ancient Monuments Society. We are a consultee on Listed Building Consent applications, as per the Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021. We are concerned with historic assets of all types and all ages, including conservation areas and undesignated heritage.</p> <p>Comments: Thank you for consulting HB&amp;P on these new and revised applications affecting the grade II listed former Turkish Baths. We generally welcome the repair of the baths and introduction of a new long-term, more accessible use for this heritage asset, however, maintain our concerns with the impact of the proposed tower development on the setting of the ground level entry pavilion and therefore object to both applications. HB&amp;P provide the following observations. It is disappointing that the listed building is still seen as a hinderance rather than an asset, and that has been evident in both the original and revised plans that have</p> |

been submitted. The continued intrusion of the new building elements into the basement, such as the escalator pit and the revolving door pits. There is ample room within the large lobby area for these, yet they are located where they directly interfere with the structure of the listed section of the basement. The loss of this floorspace limits the flexibility and viability of the basement area and would be better used as storage or support space to maximise its viability. Questions remain as to where chairs, etc. will be stored if it's a performance space/ exhibition space. Internally, there are several details that are not properly explained or detailed and thus the impact on the basement level of the baths is unclear. As noted above, the plans show the pit for the revolving doors which appear to intrude into the basement area. Is this pit just subsurface, or does it physically intrude into the basement? How does this alter the sense of space? Likewise, the lack of detail for the accessible WC and lift does not show how these are to work together – is more of the side wall to be demolished to allow access to the WC? With the removal of the existing plant enclosure to the rear of the kiosk, it's unclear where new M&E equipment and service runs will be located. How are the walls to be finished around the remaining pillars? Regarding the roof to the basement, was this replaced with the demolition of the previous building when the courtyard above was created or is the current ceiling structure original? We note the original tiling and decoration was removed with the previous uses, but is the structure itself of any interest? The coloured pavement/ roof lights may cause issues and conflicts with the use of the proposed exhibition/ performance space and it is recommended that the final user provide their input into the practicality and desirability of coloured light before proceeding. HB&P are also concerned about the proposed green roof to the pavilion. This is not appropriate on this type of building and interferes with the geometric ornamentation and design of the pavilion. Nor have plans been provided to show how the roof would be altered to fit waterproofing, etc. Given the change to the locality since the pavilion was built, is any sort of interpretation being provided to explain the historic context for its design and location?

It is also important for the setting of the pavilion that the surrounding landscaping and cladding does not appropriate cultural symbols and is not too 'busy' and overbearing. Ilona Rose House on the corner of Charing Cross Road and Manette Street in the City of Westminster is an example where the overzealous use of patterned and coloured cladding detracts, rather than enhances the streetscape and

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|  | <p>local setting. The pavilion should be the key focus, not the new build elements. Of most concern, and the key reason for our objection, is that the amended plans have done little to reduce the impact of the development on the setting of the pavilion. The cantilevered nature of the tower and the floor plane of level 3 extending out to the finial atop the pavilion's dome continues to be unacceptable. The local context has changed irreparably, leaving the pavilion somewhat isolated. The nature of the cantilever means the new build elements would now completely dominate the pavilion with the overhang interfering with its unique roofline, further eroding and harming its setting and the way it is viewed. The design is clearly contrary to the advice of Historic England in its guidance on the Setting of Heritage Assets and to Para. 199 of the NPPF (2023).</p> <p>Recommendation: Refusal or submission of amended plans omitting the cantilever section of building over the listed heritage asset. If a revise scheme is not submitted, HB&amp;P recommend that the application is refused for being contrary to Para. 199 of the NPPF (2023) and sections 16(2) and 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 with regards to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p> |
| <p>City of London<br/>Archaeological Trust<br/>– 26<sup>th</sup> October</p> | <p>CoLAT's area of interest and expertise is the archaeology of the City of London. In this case we hope and assume that the archaeological considerations will be adequately dealt with by the Corporation's existing procedures. We particularly emphasise the potential for public display in the future development of archaeological results from the site and the area around, in conjunction with the results from the various Crossrail projects.</p> <p>Otherwise we have no comment.</p> <p><b>Officer Response:</b> Addressed in Archaeology section of the report.</p>   |
| <p>City Police – 2<sup>nd</sup><br/>November 2023</p>                        | <p>No comments.</p>  |

## Letters of Representation



54. In accordance with the SCI, notification letters were sent to residential properties in the vicinity of the site in addition to the publicity carried out as set out above. Responses received can be summarised as follows:
55. Objections
56. A total of 352 objections have been received across both the planning and listed building consent applications. Given the number of objections received, officers have fully reviewed all the objections and selected key themes as summarised below. Some comments are referenced in full where necessary.

| <b>Representations – Objections</b>   |
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| <p><b>Listed Building Consent</b><br/>Listed Building Consent not submitted alongside the planning application.<br/>Risk of damage to the Bathhouse and the loss of character caused by the overhang of this new building.</p> <p><b>Officer Response:</b> The Listed Building Consent application was submitted on the 6<sup>th</sup> September 2023.</p>  |
| <p><b>Bath House</b><br/>Concerns for the impacts to Listed Bath House and its setting.<br/>The proposals would disturb the quiet oasis around the Bath House.<br/>The Bath House should be preserved from commercial development.<br/>The proposals would damage the historic or architectural value of the building.<br/>Enclosing the Bath House will remove an historic building from the outdoor public realm.<br/>The ‘Turkish Baths’ are an important part of the area’s history.<br/>The Listed Building will be dwarfed by a bland glass and steel building.<br/>Historic Buildings should be preserved and protected.<br/>The Bath House should not be overshadowed by other buildings.<br/>A slow process of robbing the City of London of all of its character and style and replacing it with acres of glass and steel has ruined the environment and removed all human scale from the area. This tiny example of Victorian architecture should be celebrated and exposed, not occluded, hidden and overbuilt.<br/>The proposals would affect views of the Bath House.<br/>The proposals would overhang the Bath House and dominate it.<br/>The proposals do not protect the architectural history of the Listed Bath House.<br/>Cantilevering over this building will entirely destroy the historic aspect.<br/>The proposals will visually damage the setting of the Listed Bath House.<br/>The proposals will visually damage the historic and architectural value of the Listed Bath House.<br/>Question whether the benefits of repair fully offset the harm caused to the setting of the listed building and if the scheme could not be amended to allow for the</p> |

new build to be shifted back and away from the listed building so as not to overhang the building.

If handled sensitively a new build could serve to frame the listed building as opposed to diverting attention away from, masking and dominating the heritage asset as the current proposals do.

The Councils duty to seek to mitigate the harm caused to heritage assets in any proposed scheme, in line with the requirements of the Act and chapter 16 of the NPPF, as well as the Historic England guidance regarding the setting of heritage assets.

The proposals appear likely to compromise the structure and visual amenity of the Grade II Listed Bath House.

The building should be left for the public to enjoy.

The proposals are oppressive to the existing Bath House.

The Bath House is part of the rich heritage of the City of London and should remain legible.

The trend for applications to cantilever over heritage assets is deeply concerning - for both this application and for the pending application by Sellar and Network Rail for London Liverpool St Station/former Great Eastern Hotel.

Application by Sellar and Network Rail for London Liverpool St Station/former Great Eastern Hotel. The city does not need more high rise buildings - the Chief Executive of Historic England has said in the media current with this application that the amount of high rise buildings in the City of London being given planning permission is a huge issue and that the cumulative weight of tall buildings is oppressive and detrimental to the heritage and history of the City of London.

The proposed cantilever would detract from any sense of space or setting of the building.

A scheme that cantilevers out over the top of it would be so oppressive.

The architectural heritage of London is priceless, and deserves respect, especially your wonderful train stations. The Turkish Bath is a wonderful surprise in the neighbourhood. A cantilever over it would destroy its setting and appreciation of the resource.

Object to the impact on the Turkish Baths as apart from a new view opened up to it from the west the overhanging new building so diminishes its character and contribution to the character of the area that it creates substantial harm to the significance of the listed building. The building is a charming and distinctive small-scale structure and a significant part of the evolution of this part of the City. It will be overwhelmed by the new structure.

The Bath House is an extraordinary and wonderful building that has provides a clear understanding of a cultural amenity from an earlier time. It's a beautiful and unique piece of architecture that has been preserved to date and can be enjoyed by all who pass by or make specific trips to visit it and has a cultural, historical and educational significance to the area. To now allow it to be dwarfed and overshadowed by the overhanging cantilevered section of the proposed new development will dramatically and irrevocably diminish the view of the Bath House and will literally and figuratively diminish the significance of this wonderful building. Allowing developers to envelop such buildings and effectively remove them the public realm seems to be a dangerous precedent for the City and one that must be resisted.

The proposed cantilever would engulf the Baths, changing its character, as it would negate the lantern, a crucial architectural feature of the bath house meant to be seen in silhouette against the sky - a practical architectural feature for light, but also a Victorian means of advertising the very purpose of the building.

To see an idiosyncratic and important building that survived the Blitz & the IRA be all but destroyed by being boxed in by yet another looming tower is shameful. The Bath House is unique, charming and part of the historic fabric of the City of London. It is mentioned in a number of guidebooks to "secret" or "hidden" London and is a breath of fresh air at a time when there is an increasing number of bland and sometimes ugly modern building developments within the city. The Bath House is already surrounded by modern buildings but the current planning application is for a high-rise development which will all but engulf it, with a ludicrous cantilevered extension block overshadowing the Bath House and almost touching its ornate cupola and spire. The proposal crowds the Bath House out, ruins any view of it, and shows no respect to its beauty, decorative qualities or listed status.

London needs to treasure and showcase architectural gems such as the Bishopsgate Bath House if it is to retain its character as an attractive, diverse and historically interesting capital city.

Encroachment on the unique original Bath House will be both unsightly and destructive of this distinctive monument to what was once a national preoccupation.

The bath house should be left open to the sky and visible from all prospects as it is now, leaving it as a focal point of Bishopsgate.

**Officer Response:** Addressed in Design and Heritage section of report.

### **Overshadowing**

The proposals will overshadow the Bath House.

The proposed structure will overshadow the bathhouse entrance and impact upon aesthetics and balance of an area rapidly losing its history.

The new development not only risks damage to the bathhouse during the building works, but would also completely overshadow and diminish its presence in the Bishopsgate streetscape, further anonymising the area.

**Officer Response:** Addressed in Design and Heritage section of report.

### **Loss of Character**

This is great British heritage and it would be an absolute catastrophic mistake to cheap build another new skyscraper. London is slowly starting to lose its character. This is another Victorian historic building but this one is unique as it merges British and Islamic style architecture. It's more than just a building but it's a sign of unity between Muslims and non-muslim.

**Officer Response:** Addressed in Design and Heritage section of report.

### **Adjacent Listed Buildings**

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| <p>The proposal will damage the surroundings for the church of St Botolph's without Bishopsgate.</p> <p>The scale of the new development will have a very detrimental effect on the character of this part of the City, and in particular on the former Turkish Baths, the adjacent church and church hall.</p> <p>Object to the very negative impact on St Botolph's Church from Bishopsgate due to the scale of the new building.</p> <p>The Bishopsgate Bathhouse is of historical significance and is part of the local history of the area.</p> <p>This development would significantly compromise the Bishopsgate Bath House and the neighbouring St Botolph without Bishopsgate area which is a tranquil area, important to city workers and residents.</p> <p>The existing bathhouse requires a more sensitive approach and far less encroachment into its space.</p> <p>The proposed development in its reach and extent is highly insensitive to the very proximate historic church of St Botolph's and appears to incorporate little or no consideration of its presence as a backdrop to the historic assets of the immediate area.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p> |
| <p><b>Open Space</b></p> <p>The churchyard is one of the few green spaces around there to sit and relax away from traffic.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p>  |
| <p><b>Overdevelopment</b></p> <p>The proposals result in the overdevelopment of the site.</p> <p>Once again a case of unnecessary overdevelopment of a site where there are already proposals to swamp the existing street frontage and reduce light penetration at street level.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p>   |
| <p><b>Daylight</b></p> <p>The proposals would have an impact on natural daylight.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p>   |
| <p><b>Environment</b></p> <p>The proposals would generate noise, disturbance, smells and pollution.</p> <p>Noise will be hugely increased in the buildings overlooking this quiet London graveyard and park, one of the few oasis in the city.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p>  |

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| <p><b>Pedestrian Flows/Accessibility</b></p> <p>As a final point the cantilever support as shown in the diagram creates a large and awkward structure at ground level that is an additional hazard for the disabled- particularly wheelchair users and the partially sighted - to navigate around</p> <p>The proposals would result in an inconvenience to pedestrians.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p>  |
| <p><b>Pattern of Development</b></p> <p>The proposals would conflict with the local pattern of development and has a poor relation with surrounding buildings.</p> <p>If the plans proceed, they will set a dangerous precedent for cantilevering over other listed buildings, such as the splendid Liverpool Street Station.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p>  |
| <p><b>Conservation Areas</b></p> <p>The proposals would affect neighbouring Conservation Areas.</p> <p>The proposed building's shape and size would also harm views in and out of the New Broad Street and Bishopsgate Conservation.</p> <p>The tower would actively compete with the outline of the listed former Great Eastern hotel, as viewed from the Bishopsgate Conservation area.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p>  |
| <p><b>Policy</b></p> <p>Objection to the very negative impact on St Botolph's Church from Bishopsgate due to the scale of the new building. It likewise is overwhelmed by the new structure. I believe the development is contrary to the NPPF on a number of counts.</p> <p>The Council's duty to seek to mitigate the harm caused to heritage assets in any proposed scheme, in line with the requirements of the Act and chapter 16 of the NPPF, as well as the Historic England guidance regarding the setting of heritage assets.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p> |
| <p><b>Design/Architecture</b></p> <p>The scheme is poorly designed.</p> <p>Massively over scaled and disgracefully designed with regard to the heritage of this part of the city.</p> <p>Architecturally insensitive.</p> <p><b>Officer Response:</b> Addressed in Design and Heritage section of report.</p>  |
| <p><b>Need for Office Space</b></p>  |

London isn't just about the skyline, it's about a sense of permanence and history. I expect this new building won't be built to last. In 10- 20 years it will probably be replaced by another semi-permanent structure. Does the city really need another office block especially after more people are working in a hybrid way. With the recent changes in work culture, and more people working at home, it is extremely difficult to justify expanding commercial office provision. A quick online search reveals hundreds of vacant office spaces in the Bishopsgate area already

**Officer Response:** Addressed in Provision of Office Space section of report.

### **Sustainability**

The proposed addition of 28,000 tonnes CO2e to the consented increase in embodied carbon in the Square Mile justifies refusal on its own account.

**Officer Response:** Addressed in Sustainability section of report.

### **Other**

Agreement with comments raised by the Victorian Society.

Listed buildings are an important part of our nation's heritage and should not be wrecked by greedy developers. I fully support the Victorian Society's objections to this application.

More cafes and another pub, and more retail space in this area, are hardly needed. Although the proposal mentions flexibility and possible use for maker and studio space, this is clearly intended to give the proposal a cultural and artistic 'spin'. Since there is no commitment to reasonable and affordable rents for such spaces, they will, in practice, be office.

Tourists don't come to London to explore all the glass and steel skyscrapers, they come to see our history.

There will be no benefit to the local community only to the investors of the development.

A beautiful old building which draws tourists like me to spend time and money in the area, where there is too much metal and glass. Keep the balance.

We have enough cafes and leisure spaces in this City. No one likes these spaces, - they have no sunlight and no atmosphere. If you look at the others you have created, you will see that they are depressing, dark and empty, and the shops and cafes all close down.

I'm a tour guide and tourists from home and abroad are fascinated by this piece of history. It won't be the same if any development goes ahead.

Allowing this development to proceed would undermine and demean a beautiful, quirky, and quiet part of the City of London.

**Officer Response:** Addressed in Design and Heritage section of report.



## Support

57. A total of 14 letters of support have been received.

| <b>Representations – Support</b>  |
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| Would like to see more spaces like ‘Hive’ available that offer maker/studio spaces. |
| Sharing support for the proposals.  |

58. Not all the representations above are material planning considerations. Those that are, have been dealt with in this report.

## Policy Context

59. 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.
60. The City of London (CoL) has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. Onward progress of the Plan has been temporarily paused to enable further refinement, but it remains a material consideration in the determination of applications (although not part of the Development Plan). The Draft City Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
61. Government Guidance is contained in the National Planning Policy Framework (NPPF) September 2023 and the Planning Practice Guidance (PPG) which is amended from time to time.
62. 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

63. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
64. 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:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
  - c) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
    - i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
    - ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
65. 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).
66. Paragraph 81 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
67. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.
68. 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.
69. Paragraph 93 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.
70. 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”.

71. 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.
72. 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”.
73. 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.”
74. 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.
75. 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...’

76. 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.
77. 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.
78. 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.
79. 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.
80. 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.
81. 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.”
82. 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.
83. 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.
84. 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”.
85. 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”.
86. 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**

87. 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 Town & Country Planning Act 1990);
  - To determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
88. 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).
89. In considering the planning application before you, account has to be taken of the documents accompanying the application, the environmental information including the Environmental Statement, the further information, any other information and consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.
90. 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.
91. 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 on strategic views in the London Views Management Framework and on other strategic local views.
  - f) The impacts of the proposal on the setting and significance of heritage assets
  - g) The potential impacts of the development on buried archaeology
  - h) The proposed public realm benefits and cultural offer
  - i) Transport, servicing, cycle parking provision and impact on highways.

- j) The impact of the proposed development on the amenity of nearby residential and other occupiers, including noise, overlooking, daylight, sunlight and light pollution.
- k) The environmental impacts of the proposal including wind microclimate, flood risk, air quality, building resource efficiency, energy consumption and sustainability.
- l) The outcome of the Health Impact Assessment
- m) The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.
- n) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010)
- o) The requirement for financial contributions and other planning obligations

### **Economic Issues and the Principle of Development**

- 92. The National Planning Policy Framework states that significant weight should be placed on the need to support economic growth and productivity.
- 93. 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.
- 94. 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.
- 95. 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.
- 96. 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.

97. 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
98. London Plan Policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
99. 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.
100. 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;

101. 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.
102. The south eastern corner of the application site is partially located within an area identified as the Eastern Cluster in the Local Plan 2015 (Figure G) but is not within the City Cluster area (Figure 33) identified in the draft City Plan 2036. However, the site is within an area indicated as not inappropriate for tall buildings under Policy CS14 of the Local Plan 2015.
103. 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 2015 and paragraphs 3.5.5 and 7.1.3 of the draft City Plan 2036 the boundary as shown in the diagrams are indicative.
104. 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.
105. 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.
106. 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.

107. 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.
108. 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 Corporations 'Destination City' vision for the square mile.

#### Proposed Uses

109. The proposed development has been designed to provide a mix of uses across the site campus which would include the following:
  - 23 storey (plus two retained basement levels) of office use (Class E(g)) with flexible retail/café (Class E(a)(b)) at ground floor at 55 Old Broad Street.
  - The retention of part of 65 Old Broad Street for the provision of flexible retail / cafe / maker / studio (Class E(a)(b) and (Class F1(a)(b)(e)) at ground floor, maker / studio (Class F1(a)(b)(e)) at first floor, cultural/events space at second floor and flexible maker / studio / office (Class F1(a)(b)(e)) and (Class E(g)) at third and fourth floor.
  - Renovation of the Grade II Listed Bath House for the provision of cultural/event uses (Sui Generis).
  - Provision of replacement public house (Sui Generis).

#### Existing Uses

110. The site currently comprises a number of different mixed uses amounting to 14,150sqm of existing floor space. A total of 9,220sqm is currently office floorspace (Class E), 1,433sqm comprises retail (shop/café) uses (Class E), 582sqm comprises a bank (Class E), 102sqm comprises a betting shop (Sui Generis), 471sqm comprises a public house (Sui Generis) and 2,342sqm comprises basement/back of house uses.

111. The total GIA of the proposed development is 40,582sqm and the other uses proposed are as follows:

| Land Use                       |                    | Existing         | Proposed         | Difference       |
|--------------------------------|--------------------|------------------|------------------|------------------|
| Use                            | Class              | Floorspace (GIA) | Floorspace (GIA) | Floorspace (GIA) |
| Office                         | E(g)               | 9215.1           | 33078.1          | 23863            |
| Office / Maker / Studio        | E(g)               | 0                | 667.5            | 667.5            |
| Maker / Studio                 | E(g)               | 0                | 242.8            | 242.8            |
| Retail (shop / cafe)           | E(a) / E(b)        | 1433             | 124.7            | -1308.3          |
| Retail / café / maker / studio | E(a) / E(b) / E(g) | 0                | 111.8            | 111.8            |
| Cultural / Event               | Sui Generis        | 0                | 351.2            | 351.2            |
| Bank                           | E                  | 582.1            | 0                | -582.1           |
| Betting Shop                   | Sui Generis        | 102.2            | 0                | -102.2           |
| Public House                   | Sui Generis        | 470.9            | 420.2            | -50.7            |
| Basement / back of house       | -                  | 2341.7           | 5586.6           | 3244.9           |
| <b>TOTAL</b>                   | -                  | <b>14145</b>     | <b>40582.9</b>   | <b>26437.9</b>   |

#### Provision of Office Accommodation

112. Strategic Policy CS1 of the City of London Local Plan 2015 and policy 4.2 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.1 seeks to protect office accommodation. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2036 and policy E1 of the London Plan. By the 31<sup>st</sup> March 2022, 1,261,000 sqm net increase in office floorspace had either been delivered, was under construction or was permitted in the City. A further 739,000 sqm net is required to meet the draft City Plan target of 2 million sqm net by 2036. The proposed development would deliver nearly 5.7% of this remaining floorspace target.
113. The proposed development at 55 and 65 Old Broad Street is predominantly an office building, comprising of 33,078sqm of office space (Class E(g)) and 668 sqm of office/maker/studio floorspace (Class F1(a)(b)(e)) and (Class E(g)) at

- Level 3 and 4 of 65 Old Broad Street which amounts to 33,746sqm GIA of office floor space provision.
114. As such the proposal would provide a significant uplift in office floorspace of 26,668sqm GIA at 55 Old Broad Street and would provide 668sqm GIA of office/maker/studio floorspace at Levels 3 and 4 at 65 Old Broad Street.
  115. The office space is classified as Grade A office space. It is predicted to accommodate 1,990 to 2,625 Full Time Equivalent (FTE) jobs. Adopted Local Plan Policy CS1 seeks a significant increase in new office floorspace in the City and Policy CS7 seeks to deliver new high-quality office floorspace on the Eastern Cluster. The draft City Plan, Policy S1, seeks to deliver 2 million sqm net of new office floorspace in the period between 2016 and 2036. Draft City Plan policy S4: City Cluster, also seeks to deliver an increase in sustainable, world class office buildings in the City Cluster Key Area of Change. The proposed development would deliver an increase of 23,000 sqm GIA in Grade A office floorspace in the Cluster, contributing to the achievement of the office floorspace target in both the adopted and emerging draft Local Plans.
  116. In terms of the proposed 668 sqm of office/maker/studio floorspace at Level 3 and 4 of 65 Old Broad Street, 25 co-working desks will be available at affordable, discounted market rent levels. Other desks in this space would be available to general users, though with a cap on organisations taking no more than 5, to ensure the space remains tailored to SMEs, start-ups and creatives.
  117. The proposed development at 55 Old Broad Street is 23 storeys. The office use is accessed from the western side of the new building with escalators to the lobby on Level 2 with lifts to the upper floors. Office uses are provided on Levels 3 - 22. Retail space is located at ground level. Emerging City Plan Policy OF1 promotes commercial uses as part of office-led development at ground levels to activate streetscapes.
  118. The typical office floorplate is 14,500sqft (1347sqm). The office spaces are designed to support a range of tenants, with flexibility to enable areas of the floor to be removed to connect levels and create double height spaces. Emerging City Plan Policy S4 encourages new floorspace to be designed to be flexible to allow adaptation of space for different types and sizes of occupiers.
  119. A range of office floorspace is required to meet the future needs of the City's office occupiers, including provision for incubator, start-ups and co-working space. The S106 agreement would include an obligation to make specific and identified provision within the development for such occupiers.

120. The scheme meets the aims of policies in the London Plan, CS1, DM1.1, 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 33,078 sqm plus an additional 668 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/Maker Studios

121. The application site is located within the designated Liverpool Street Principal Shopping Centre (PSC) as set out in the Local Plan (2015). The existing site contains 1433sq.m of retail floorspace including a bank and betting shop. The proposed works to this site would provide 125 sqm of retail/café floorspace at the ground floor of 55 Old Broad Street and in the 'cycle hub' and 112 sqm of retail/café/maker/studio floorspace at the ground floor of 65 Old Broad Street amounting to 237sq.m of retail uses (Class E and Sui Generis) floorspace.
122. On the ground floor of 55 Old Broad Street, it is proposed that the space on the corner of Wormwood Street and Old Broad Street will accommodate a café operator as this would be co-located in the short-stay cycle arrival hub. More traditional retail shops are proposed in the space allocated for retail fronting Wormwood Street which would be an improvement when compared to the existing uses that front Wormwood Street.
123. On the ground floor of 65 Old Broad Street, flexible retail / café / maker / studio space secured as affordable retail linked to the maker / studio space on the upper levels of the building is proposed. The proposed development will deliver 243 sqm GIA of flexible maker / studio workspace at level 1 of the retained 65 Old Broad Street building, which will be made available to qualifying users at discounted market rent.
124. The proposed retail / café floorspace will provide a valuable offer to occupiers of the proposed building, occupiers of surrounding office buildings, local residents and visitors to the area. This flexible use will meet a location-specific need for additional community focussed retail floorspace to support the immediate area, which includes residents and also the growing and planned growth in office stock as identified in the Draft City Plan (Policy S4).
125. As a whole, 65 Old Broad Street is intended to function as an accessible and affordable incubator for micro and SMEs in creative/cultural/light industrial industries, with complementary retail and events spaces for selling and



- promoting their crafts. By virtue of this area being provided as incubator space, the scheme will deliver greater opportunities for start-ups and SMEs to operate.
126. Local Plan Policy DM 20.1 sets out that within Principal Shopping Centres (PSCs) the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. By way of criteria, this will be assessed against 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 effect of a proposal on the area involved in terms of the size of the unit; the contribution the unit makes to the function and character of the PSC; and 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.
127. The proposed development would result in a loss of retail space. However, it is noted that the quality of the current retail provision along both Old Broad Street and Wormwood Street is varied, with several vacant premises and inactive frontages, particularly on Wormwood Street. Active frontages are provided along Old Broad Street and Wormwood Street and the scheme would increase connectivity through the enhanced public realm. The proposal would result in a loss of floorspace by way of larger retail units to be replaced by smaller units however, the proposed scheme would achieve a similar degree of active retail street frontage within the PSC; would ensure the role and function of the PSC is maintained; and would maintain a similar the presence of the PSC in terms of length of frontage, composition and distribution of retail uses. Some of the existing uses are not protected by the Local Plan policies including the banks and betting shops.
128. Overall, the proposed scheme would not demonstrate a visual significant loss of active retail frontage. Moreover, the offering will be of high quality and will encourage activation at ground floor around the proposed building and through the enhanced public realm.
129. Policy DM1.5 aims to encourage a mix of commercial uses within office developments which contribute to the City's economy and character. Adopted Local Plan Policies CS20 and DM20.1 prioritise retail uses within PSCs and seek to resist the loss of retail frontage and floorspace. Emerging City Plan policy RE1 encourages the continued provision of retail uses in the PSC and complementary uses that provide an active frontage. The proposals are in conformity with both emerging and adopted Local Plan retail policies.

#### Public House



130. London Plan Policy HC7 (Protecting Public Houses) states that boroughs should protect public houses where they have a heritage, economic, social or cultural value to communities and applications for the loss of public houses should be refused. Policy HC7 also supports proposals for new public houses. Policy DM1.5 aims to encourage a mix of commercial uses within office developments which contribute to the City's economy and character.
131. The current public house provision amounts to 470sqm. The proposed development would result in the loss of 50sqm of existing public house use (Sui Generis) as the proposed public house use would amount to 420sqm in the eastern part of the site adjacent to 55 Old Broad Street. The pub use would be re-provided in a slightly smaller unit, in the same location, with a larger outdoor amenity offering and would be well integrated into the wider development scheme. The proposed facades have been designed to reflect the character and appearance of a typical pub, in a contemporary and refined manner and would be clad with glazed red bricks. The proposals would include a larger outdoor amenity space that would integrate well into the enhanced public realm adjacent to the Bath House. The proposals are in conformity with both emerging and adopted Local Plan retail policies. It is considered that the re-provision of the public house accords with London Plan Policy HC7 and its re-provision will be secured by way of s106 planning obligation.

### Cultural Space

132. Local Plan policy DM10.3 and draft City Plan 2036 policies S8, S14 and DE5 seeks the delivery of high quality, publicly accessible elevated viewing spaces where they don't immediately overlook residential premises. Public access to tall buildings in the City is important in creating an inclusive City for all.
133. The proposed development would provide 31sqm of cultural/event floor space at Level 2 of 65 Old Broad Street and 320sqm of cultural/event floor space at the Bath House.
134. The existing Grade II Listed Bath House (currently a private events space) is proposed to be retained and refurbished as a cultural/events space with greater opportunity for public uses free of charge for local community groups, schools, cultural / arts groups and charities for uses including gallery / exhibitions, showcasing of maker / studio space work, and education visits / events.
135. A Visitor Management Plan would be secured through a Section 106 agreement with the finer details of the operation and security checking arrangements to be negotiated.

### **Design and Heritage**

The proposals include:

- the reconfiguration and refurbishment of the existing building at 65 Old Broad Street,
- the construction of a new building of 24 storeys that steps down to 19 floors in the north-western part, and
- the refurbishment of the Victorian Bathhouse

#### Principle of a Tall Building

136. The proposal includes a new building which at the highest is 103.15m and 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).
137. The CoL's long-term Plan-led approach to tall buildings is to consolidate into a coherent singular City Cluster urban form, in accordance with strategic tall buildings policy CS 14(1) and S12 and strategic spatial policies CS7 and S21. This is essential to the careful strategic balancing of growth and heritage at the core of a Plan-led approach.
138. With reference to the 'Eastern Cluster' Policy Area in the adopted Local Plan (Policy CS7, fig. G) the proposal is partly within the Eastern Cluster and partly outside of it. In the emerging City Plan 2036, the proposal falls outside the revised 'City Cluster' Policy Area (emerging Policy S21, fig. 33). In both Plans, these area policies are not the sole means of identifying areas appropriate in principle for tall building development, pursuant to London Plan Policy D9 (B); to achieve this, they instead specify where tall building development would not be appropriate (policies CS14 and S12; figs N and 21). Under the provisions of both Plans the proposal site is not located in an area identified as inappropriate for tall building development.
139. As such, the proposal would engage CS14 (3) under which tall buildings would be permitted elsewhere in the City only on those sites which are considered suitable in relation to skyline, amenity and heritage impacts; emerging policy S12 (2) similarly encourages tall buildings on suitable sites in relation to these impacts. These impacts are assessed in detail at sections XXX-XXX of the report below, and while some modest impacts are identified, officers are of the

view that these are not of the order of magnitude to render the site inappropriate, in principle, for a tall building.

140. The proposal site does fall within the revised boundary of the 'City Cluster' Policy Area in the draft City Plan 2040, identified – and with heights specified – explicitly as appropriate in principle for tall building development, pursuant to London Plan D9 (B). The proposal would accord both in location and in height with the provisions of the draft City Plan 2040. These have been shaped by an extensive characterisation study and 3D modelling exercise and is tacitly supported by the proposal site's exclusion from the areas identified as inappropriate in the 2015 and draft 2036 Plans. Although the draft City Plan 2040 has yet to be submitted to Planning and Transportation Committee, and therefore this information must be weighted accordingly, it is considered useful additional context.
141. Taking all these matters into account, it is considered that the proposal would be conform to the City's Plan-led approach as the site is in an area effectively identified as appropriate for a tall building in accordance with London Plan Policy D9(B).
142. 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 would deliver 5.7% of the required commercial space to meet projected economic and employment growth demand until 2040. This quantity of floorspace would contribute to maintaining the City's position as the world's leading international financial and business centre.
143. Officers consider the principle of a tall building on the southern part of this site is appropriate. The proposal draws strong support from adopted Policy CS1 and would align with the objectives of Policy CS7, which seek to ensure the Cluster can accommodate the Plan's significant growth in office and employment floorspace, whilst drawing support from Policy 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.

144. 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.
145. As a matter of planning judgement it is considered that the proposal would accord with London Plan Policy D9 A, B and D, Local Plan Policy CS14 (1, 2, 4), CS7 (1, 2, 4-7), draft City Plan 2036 S12 (1, 3, 6), S21 (1, 3, 8). There is some conflict with London Plan D9 C (1 (a), (d) and (h)), Local Plan CS14 (3), CS7 (3) and draft City Plan 2036 S12 (2) and S21 (2) due to adverse impacts on a single designated heritage asset and one LVMF view (15B.1). 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:

146. This section assesses the proposals against the requirements of policy D9(C 1-4) 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:*

147. The site is located at the north-western edge of the City Cluster which is a carefully curated collection of tall buildings that 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 proposed tall building has been designed with the future evolution and consolidation of the Cluster in mind. As such the proposal would be appreciated as in keeping with the evolution of the Cluster, readily identified as part of this group and reinforcing the spatial hierarchy of the local and wider context. 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.

148. In relation to London Plan Policy D9(C; 1; a; i) the impact of the proposals upon the City and wider London skyline in long range views has informed the optimisation of the site and the overall height and form of the proposed tall building. In relation to long range views, these have been tested in the THVIA Views 01 to 08, including LVMF 15B.1, LVMF 16B.2, LVMF 17B.1 and LVMF 17B.2. Additional LVMF views have been incorporated within the Appendix A of the THVIA April 2023 including LVMF 1A.1, LVMF 1A.2, LVMF 2A.1, LVMF 3A.1, LVMF 4A.1, LVMF 5A.2, LVMF 6A.1, LVMF 10A.1, LVMF 16B.1 and LVMF 26A.1. Some of the objections from statutory consultees relate to these views and the impacts are discussed through the report and in detail in the Strategic View and Heritage sections of the report. Views from neighbouring boroughs have also been included within the Appendices of the THVIA.
149. The proposal relates appropriately to the form and character of the developing Cluster, as it responds to the overall form and cascading height of the Cluster from its apex at 22 Bishopsgate/1 Undershaft that steps down towards the site. 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 (consented)
  - 22 Bishopsgate: 294.94m (existing)
  - 55 Bishopsgate: 284.68m (consented)
  - 122 Leadenhall Street (the 'Cheesegrater'): 239.40m (existing)
  - Heron Tower: 217.80m (existing)
  - 52-54 Lime Street: 206.50m (existing)
  - Tower 42: 199.60m (existing)
  - 30 St Mary Axe (the 'Gherkin'): 195m (existing)
  - Leadenhall Court: 182.7m (existing)
  - 20 Fenchurch Street: 160m (existing)
  - 85 Gracechurch Street: 155.70m (consented)
  - 70 Gracechurch Street: 155m (consented)
  - 50 Fenchurch Street: 149.6m (consented)
  - 55 Gracechurch Street: 146m (consented)
150. Generally, in long views , the proposed tall building complements the City Cluster of tall buildings as it is of a height appropriate to its location and of high

architectural design quality. The location of the proposed tall building at the southern part of the site and the overall form and massing strategy were directly in response to the established hierarchy of Cluster while respecting the City and wider London skyline. In London Panoramas, the proposed development either would be hardly visible, blending in with existing buildings in the Cluster (such as Views A2, LVMF 1A.2, A28 LVMF 3A.1, A3 LVMF 4A.1 and A4 LVMF 5A.2) included in the THVIA) or it would not be visible at all due to intervening taller buildings (such as Views A27 LVMF 2A.1, and A5 LVMF 6A.1). From LVMF 15B.1 from Waterloo Bridge, the proposed tall building was designed to minimise any impacts on designated heritage assets. However, there is a very minor erosion of the sky gap between the Cathedral and the established group of tall buildings to the right of the view, which include the buildings within the Cluster and the Chapter Spitalfields (Nido Spitalfields). Objections from some statutory consultees relate to this view and the impacts are acknowledged by Officers and discussed in detail in the Strategic View and Heritage sections of the report. In this respect, in relation to long range views, the development would slightly conflict with Policy D9(C; 1 a; i). In all other River Prospects, the proposed development would appear as a very small addition to the existing tall buildings, in some cases as part of the consolidating Cluster and in others, next or behind Angel Court which is taller than the proposed development.

151. In relation to D9(C; 1; a; ii), mid-range views, the THVIA includes Views 09 to 12, 15, and 20 to 23 to assist in the assessment of any impacts. The highest element of the tall building rises to 23 storeys and the lower steps down to 19 storeys to match the height of Dashwood House that is directly to the north of the site. This allows for a smoother transition from the tallest Cluster buildings to the lower buildings to the north, east and west of the site. In views from Sun Street Passage, Finsbury Circus and London Wall, the proposed development would appear next or in front of taller buildings, including Tower 42 (View 13) and 110 Bishopsgate (Views 10-13). As such it would be seen in an established high-rise setting, blending in smoothly with the existing backdrop of buildings. In views along Bishopsgate (Views 20-23), the proposed development would appear creating a more singular urban skyline form, however it would still appear as part of an existing backdrop of tall buildings, including 99 Bishopsgate that appear of similar height or taller than the proposed tall building. From the south of Threadneedle Street, at the northern end of the Royal Exchange, part of the proposed development would be seen in the background, mostly conforming with existing building heights of the foreground buildings and in a much smaller height than the prominent Tower 42.
152. In such mid-range views, the proposed tall building would have a dynamic sculptural form, and its elevations would have a regular and ordered quality

providing a calm and ordered appearance at middle and long range. The architecture and material treatment of the tall building would give the proposal a distinctive identity on the skyline while providing appropriate responses to key landmarks such as St Paul's Cathedral (Grade II), Church of St Botolph (Grade II\*) and Church of All Hallows (Grade I). There have been objections from some consultees relating to the impact on the settings of these heritage assets, addressed in the relevant heritage sections below. However, officers consider that the development complies with London Plan D9(C; 1 a; ii) in relation to mid-range views.

153. In relation to immediate surrounding streets (London Plan D9(C; 1 a; iii)), THVIA Views 13, 14, 16 to 19 and 24 to 2 illustrate the closer range views of the building and how the building is experienced at street level from Old Broad Street, New Broad Street, London Wall, Wormwood Street, Sun Street Passage and Bishopsgate. Great consideration has been given to the 'base' of the building which has been split into separate elements, including the 'pod', the glasshouse and the public house, all of which are treated separately to provide interest and respond better to the surrounding townscape along Wormwood Street and London Wall. The lower parts of the buildings were designed to appropriately 'bridge' the gap between the historic properties along Wormwood Street and London Wall, of the two adjacent conservation areas, in a contemporary but sympathetic way. Two routes across the site break up its lower mass creating a humane and pedestrian friendly experience. The ground-level elements of the development would contribute to the liveliness of the surrounding streets, as their activities and features would create a more engaging and vibrant atmosphere compared to the current street frontages. There have been objections from some consultees on the impact of the scheme on the grade II listed Bathhouse in particular, addressed in the relevant heritage sections below, but officers consider that the development complies with London Plan D9 (C;1 a; iii) in relation to these close views.
154. In relation to D9 (C;1b) the proposal has been designed to complement the existing stepped form of the City Cluster. It has been designed to respond to the location of the development site at a key intersection along the A1211, a major east-west road within the City, which also serves as a significant western approach route to some of the tallest buildings on Bishopsgate. The scale and architectural ambition of the development are intended to strike a balance between the tall buildings in the central part of the City Cluster, situated to the south and east of the site, and the medium to large-scale buildings to the north and west of the site. As such, 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.



155. In relation to D9 (C 1c) the architectural quality and materials would be exemplary and maintained through its life span. The proposed tall building would be of a refined, sculpted form, while its facades would maintain a sense of regularity and order, presenting a composed and tranquil appearance, especially when viewed from medium and long distances. The facades would be modelled with depth and articulation, and patterning within the cladding would provide visual interest when observed up close. The proposal aims to improve accessibility in the nearby area by introducing north-south routes through the new building. Additionally, it would reconfigure the existing east-west covered pathway, converting it into a partially open route, with a realignment that aligns it more directly with New Broad Street.
156. Overall, the architectural approach is considered to deliver a high standard of aesthetics, be of a high material and design quality and to complement the skyline. The development is driven by achieving structural efficiency and carbon reductions. The materials and detailed design would be the subject of conditions to ensure quality is maintained to deliverability on site. The base of the proposed tall building would be split into two main elements and incorporate two routes to the north, would introduce a human scale at pedestrian level providing a new sheltered public space 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 section of this report below. In these respects, the development is considered to comply with D9C 1c.
157. 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 a slight level of less than substantial harm to the significance of St Paul's Cathedral, though the proposals slight encroachment into the sky gap between the Cathedral and the Cluster, both by day and by night. Otherwise, the significance and contribution of setting of a broad range of designated heritage assets would be preserved.
158. Comments have been received from the Surveyor to the Fabric of St Paul's, Historic England, the Victorian Society, the Georgian Group, SAVE Britain's Heritage, London and Middlesex Archaeological Society, Historic Buildings & Places (working name of the Ancient Monuments Society) and the Twentieth Century Society. These are discussed in the relevant sections below.

159. 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 that would complement the City Cluster and an essential contribution to the provision of required office space.
160. Since the design inception alternative proposals have been explored including reduction in height and amendments to the design to refine the presence of the proposals in relation to the setting of St Paul's Cathedral. The proposed design has been optimised to minimize its structural complexity and embodied carbon footprint. The oversailing approach in part of the proposed new building was used to minimise the need for structural columns within the public realm while aiming to strike a balance between architectural appearance and sustainability, ensuring that the building minimises its environmental impact.
161. In relation to D9 (C; 1; d) there is some very limited conflict with this aspect of the policy due to the very minor adverse heritage impacts.
162. The development would comply with respect of D9 (C 1 e) as there would be no impact on the Tower of London World Heritage Site. The development site is not located within the local setting of the WHS and the Zone of Theoretical Influence (ZVI, p. 345 of the THVIA) shows that there would be no intervisibility between the proposed development and the WHS, including its local setting area, as can also be seen in View A7 LVMF 10A.1 Tower Bridge where the development is not visible.
163. In respect of D9 (C; 1; f), the proposal due to its location, set well back from the banks of the River Thames, outside the Thames Policy Area, as well as its relative smaller scale in comparison with the taller buildings in the Cluster, it would preserve the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river, in accordance with D9 (C; 1; f).
164. In respect of D9 (C; 1; g), the proposal would not cause adverse reflected glare, addressed elsewhere in this report. 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. Further details would be submitted through a condition to address potential glare issues to ensure compliance with D9 (C; 1; g)

165. Potential light pollution impacts arising from the proposed development have been assessed and in the Light Pollution section below. The proposal has been designed to minimise light pollution. This was a specific consideration especially in the facades visible from 15B.1 where Views 03N and 03N.1 which shows that the proposal would have a more pronounced presence at night compared with the existing situation, and create the potential for conflict with D9 (C; 1; h) in this regard. 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. These would be provided and assessed as part of the relevant condition in order to mitigate the scheme's impact on the nocturnal view of St Paul's Cathedral. In this, the proposal draws a slight degree of conflict with D9 (C; 1; h)

#### *Functional Impact*

166. 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.

#### *Environmental Impact*

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

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

### *Public Access*

169. London Plan Policy D9 (D) sets out that free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London. The proposal would also provide 31 sqm of cultural/event floor space at Level 2 of 65 Old Broad Street and 320sqm of cultural/event floor space at the Bath House. The publicly accessible uses would be prominent and visible to passers-by, particularly the pub, makers spaces/studios and the retail/café, their location has been thoughtfully positioned to be obvious and legible to potential users with appropriate signage and wayfinding measures to ensure entrances are clearly legible, the details of which are reserved for condition. The proposed scheme would therefore deliver free to enter, publicly accessible areas and they would contribute towards an improved pedestrian experience and amenity at ground floor level where views of the Grade II Listed Bath House can be enjoyed in public spaces.
170. It is considered that in this instance it is appropriate to secure the provision of publicly accessible open space as proposed and that this has been optimised in respect of the site's particulars and that the proposal would meet the considerations of Policy D9 (D).

### Tall building, conclusion

171. 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 complementing the City Cluster. As a matter of planning judgement, it is considered that the proposal would accord with London Plan Policy D9 A, B and D, Local Plan Policy CS14 (1, 2, 4), CS7 (1, 2, 4-7), draft City Plan 2036 S12 (1, 3, 6), S21 (1, 3, 8). There is some conflict with London Plan D9 C (1 (a), (d) and (h)), Local Plan CS14 (3), CS7 (3) and draft City Plan 2036 S12 (2) and S21 (2) due to adverse impacts on designated heritage assets and 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.

172. Given the nature of these 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:

173. The proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate the significant growth of core CAZ, providing employment and complementary commercial, cultural and educational uses, supported by additional public space at the Bathhouse and the 2<sup>nd</sup> floor of 65 Old Broad Street. 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.
174. The proposal is at the heart of the strategic delivery function of the City Cluster to accommodate substantial growth in accordance with Policies CS7 and London Plan Policies SD 4, SD5 and E1. The design response for a new building has been carefully considered with multiple contexts, including at street level, close views, relationships with nearby buildings, longer views from outside the City and in relation to the Conservation Areas and existing heritage assets within and surrounding the site.
175. The proposed development would provide 5.7% of the projected demand for office floor space in the City, and the proposals sought to optimise this delivery in a design-led approach which seeks to consolidate the City Cluster and reduce pressure on more sensitive environments elsewhere. This long-term approach has created an evolving character and context of tall buildings. The proposal has been designed to mediate between this context and the lower scale of buildings immediately outside the Cluster boundary. Despite the small degree of conflict identified with impacts on heritage assets and views, 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 Local Plan Policy CS10 and draft City Plan 2036 policy S8.

176. Tall buildings in the vicinity of the site include 99 Bishopsgate (26 storeys) and Tower 42 (47 storeys) to the south, and 110 Bishopsgate (Heron Tower, 46 storeys), to the east. Dashwood House (19 storeys) is located directly to the north of the site. Bishopsgate Conservation Area extends to the east and north of the site while New Broad Street Conservation Area extends to the west. The site therefore is surrounded in parts by development of various scale and styles, including modern high rise development and lower rise historic townscape. The new building's height at 55 Old Broad Street aligns with other buildings in the area like 99 Bishopsgate, fitting well into the vital east-west route of London Wall/Wormwood Street at its junction with Old Broad Street. It stands notably shorter than the taller buildings along the eastern side of Bishopsgate, such as One Bishopsgate Plaza, 110 Bishopsgate, and 100 Bishopsgate. This positions it as an intermediate-scale development between the City Cluster's tallest structures to the east and south and the mid-rise buildings typically found to the west along London Wall and northward around Broadgate.
177. 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.
178. Fundamentally shaped by its role as a mediator between the distinctiveness of the City Cluster and the character of the lower buildings and townscape to its north and west, the proposal would achieve this through architecture of the highest quality, with excellent sustainability credentials for a tall building. It would be attractive from different viewpoints and from varied distances and would integrate unique cultural spaces in the form of the Bath House, which would be publicly accessible and the varied uses at the re-imagined 65 Old Broad Street which is intended to function as an accessible and affordable incubator for micro and SMEs in creative/cultural/light industrial industries, with complementary retail and events spaces for selling and promoting their crafts.
179. The proposals have been designed to respond to the site's varied context with a tall building of a striking and simple design, demonstrable and expressed sustainability. The existing building at 65 Old Broad Street would be retained, reconfigured and extensively refurbished. The existing Grade II listed Victorian Bathhouse would also be retained and sympathetically refurbished. The new building at 55 Old Broad Street would rise to 23 storeys above ground floor

level, while the retained building at 65 Old Broad Street would consist of the ground floor plus five storeys. The Grade II listed Victorian Bath House would be converted into a gallery, exhibition space, and flexible area.

180. In response to the townscape analysis, a simple sculptural form is proposed, composed of a lower rectilinear volume with a triangular upper element. This responds to the LVMF constraints, steps between mid-height buildings at the edge of the City cluster and much taller buildings beyond, and creates a building that
181. would be calm, elegant, and subservient to St Paul's; whilst providing a distinctive, simple and sculptural silhouette in local views.
182. The new building boasts a dynamic sculptural design, featuring two distinct elements of varying heights, perceived as two interlocking, broadly triangular sections. Rectangular volumes projecting on the eastern frontage, along with corner terraces at the southwest and northeast corners, further add definition to the structure and break down its overall scale.
183. It exhibits a strong sense of order, with a lower-level base, a primary middle section above, and an elongated and angled top part. The design of the upper floor façade has been amended to create the impression of a double-order 'loggia' around the crown of the building. The facades follow a grid pattern of regularly spaced single window bays, imparting a highly organised aesthetic. The inseting of glazing and spandrels within a concrete frame adds depth and detail to the facades, while the use of patterned spandrels and perforated louvre panels in select locations provides visual intrigue.
184. The massing and form of the proposed scheme has been developed through a close analysis of long and short townscape views. This has been informed by the site's position on the edge of the City cluster, between two conservation areas, the
185. different character of Old Broad Street and Wormwood Street boundaries, the immediate relationship with Dashwood House, emerging developments in the City of London, and the proposal's appearance in the background of important London View Management Framework (LVMF) views. The silhouette of the proposed massing was particularly informed by LVMF 15B.1 from Waterloo Bridge, in which the proposal appears a prominent mediator between Cathedral and Cluster; the silhouette of the proposal here was shaped by the existing presence of the Nido Spitalfields. Nevertheless, in optimising the site's potential, there is some very minor conflict with the setting of St Paul's



Cathedral. Design refinements have sought to reduce this harm through amendments to the screening balustrade that would be visible from Waterloo Bridge (15B.1). In response to 15B.1, the proposal aims to blend with the City cluster, rather than St Paul's, using colour to blend in with its context when seen from Waterloo Bridge.

186. The proposed facades have been designed to respond to their respective contexts. In terms of the western façade and the relationship with Church of All Hallows , the proposal was designed to contrast with but not detract from Church, using colour to provide a separation with surrounding objects. The colour palette of the east elevation was amended following submission to ensure there is a single hue across the facade composition of tone and forms with Dashwood that does not complete with St Botolph-without-Bishopsgate.
187. The design of each façade has been informed by relevant solar, wind, view and radiation analysis, resulting in better informed building responses. Therefore, building upon the building form and overall contextual response, this analytic approach provides the basis for shaping the façade geometry, intricate elements and materials.
188. As part of the design of the building, green spaces have been integrated on every floor, where there would be access to greened external spaces. In design terms this would be appear as a continuous green ribbon of balconies, green roofs and planting that animate the appearance of the tall building. Greenery, including trees and planters has also been incorporated in the public realm and within the Glass House. A green roof would be provided at the flat roof of the Bath House and at 55OBS which would also include green terraces. The roof gardens and spaces have been designed according to Policies DM 10.2 and DM 10.3.
189. In support of the aim to establish the site as a gateway to the City along London Wall, as well as the exploration of a narrative concept reflecting the Roman Wall on the southern elevation. The characteristics of the Roman Wall (p. 75 of the DAS) would be reflected on the proposed building through the inclusion of a large-scale texture on the southern elevation, inspired by a detailed analysis of surviving parts of the wall and tonal and pattern cues on the eastern elevation. Furthermore, the path of the wall will be delineated across the public realm with paving, pattern and incorporation of display areas for Museum of London artifacts and information.

190. The base of 55 Old Broad Street would feature two distinct components, both set back in relation to the main floors above. The smaller component (referred to as 'the pod') would be located to the west of the route and at the western edge of the site. The larger eastern component would house 'the glasshouse' and a public house. The lower levels of 55 Old Broad Street, particularly the glasshouse, will have extensive glazing, contributing to the vibrancy of the surrounding streets while the public house use within it would be clad with glazed red bricks. The pod would be covered with concrete batons made from material reclaimed from the existing building. Splayed corners have been introduced to the eastern elevation of the pod, and the north-western corner of the bigger base element, to improve pedestrian flow and circulation through the site. Two external V-shaped columns situated to the north and south of the smaller base element, to provide support to the main floors above. The design of the glass house carefully considers the environmental conditions necessary for both the plants and the users and it is designed to be both an immersive natural environment and a functional entrance reception space.
191. The public house would replace an existing public house on the site. The proposals would improve the existing arrangement, creating a more prominent element, incorporating enhanced landscaping and seating areas to the north. The facilities of the pub would be improved retaining the primary trading area on the ground floor. On the eastern side of the pub, the proposed pedestrian pathway would improve connectivity while presenting a contemporary interpretation of traditional City alleyways. The proposed materials, including glazed red brick, and façade treatment, that has been amended to include more texture and depth, have been developed through historic and contextual analysis, resulting in a design tailored to the specific location while drawing inspiration from common design elements found in traditional pub architecture.
192. The design incorporates two new covered routes through the base of the new building, and it replaces the existing covered access point on Old Broad Street with a more directly aligned open access point, improving permeability within the site's urban block and the local area. Overall, the public realm across the site will see substantial enhancements.
193. Apart from office floorspace, the tall building at 55 Old Broad Street would include retail/café floorspace at the ground floor. The retained building at 65 Old Broad Street would include retail/café/maker/studio floorspace at ground floor level, maker/studio floorspace at Level 01, cultural/event floor space at Level 02 as well as office/maker/studio floorspace at Levels 03 and 04. [The Bath House would be converted to cultural and event floor space.](#) This mix of uses would create an enhanced and more socially and economically inclusive place. The uses and spaces are well defined and legible, comfortable for users

and combined with the public realm improvements, they would enhance the urban environment of Wormwood Street and Old Broad Street.

194. The elegant design of the tall building combined with the people focussed base elements would create a rich and humane tall building, all in accordance with London Plan policy D3, Local Plan policies CS 10, DM10.1 and emerging City Plan 2040 S8.
195. The existing building at 65 Old Broad Street would be retained and reconfigured, to expand public areas in the north, and create sheltered public spaces in the south. The mixture of uses proposed for the ground floor would encourage public use, combined with external public spaces for events. New and repurposed finishes would be applied to the refurbished building, Recycling materials from the parts of the building which would be demolished would be repaired and treated to be reapplied to 65 Old Broad Street. Simple architectural interventions are proposed to restore and improve the quality of a space, including the provision of larger doors and improved finishes to the entrance lobby to access the upper levels would enhance its visibility and arrival experience to the upper floors.
196. Circulation and public access points to lifts and staircase have been designed to be prominently position and inclusive. The office building would be accessed at ground floor via the glass house, a triple height landscaped lobby designed to provide a prominent arrival experience. The building line would be recessed to allow for a sheltered approach at ground floor and to relieve the pressure on the narrow pavement along Wormwood street. The glass house would connect with a complementary retail space. This is suggested as cafe, accessed from within the glass house, and from Wormwood Street. 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.
197. Facade maintenance and cleaning have been considered. The facades would be cleaned and maintained through a single centrally-located BMU. When not in use this would be hidden below the roof line, so it would not be visible in any key views.
198. The development is considered to be an exemplary architectural response with sustainability, microclimate, streets, people and spaces in mind, and presents an innovative design solution which makes effective use of limited resources. In the majority of visual experiences the bulk, height, massing and quality of

materials and design approach are appropriate to the character of the City and the City Cluster.

### **Urban Design and Public Realm**

199. 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 high quality cycling facilities, 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
  
200. The layout of the ground plane, with its arrangement of routes, refreshed public spaces and uses will generate activity at ground floor level, positively stitching the site into the wider urban grain. New north-south pedestrian routes through the site towards London Wall will improve pedestrian connectivity from Liverpool Street Station towards the Eastern Cluster and will alleviate some pedestrian congestion on the streets on the periphery of the site. Alongside the new north-south pedestrian routes through the site, pavement widening, new pedestrian crossings and improved existing pedestrian crossings, subject to a s278 agreement, would open up a new, more direct, pedestrian desire lines towards the eastern cluster, with the proposed development playing a positive role in shaping an improved environment for pedestrians alongside other emerging and consented developments. The s278 works secured through this application would be delivered in accordance with the emerging Liverpool Street Healthy Streets Plan which is currently in consultation.
  
201. Improved east-west connections will form a positive relationship with the New Broad Street Conservation Area to the west and the Bishopsgate Conservation Area to the east, enhancing the appearance and function of the existing public space which sits between the two conservation areas, rather uncomfortably at present. The arrangement of the buildings, routes and public spaces would create an urban structure characteristic of the city, with streets, courts, routes and public spaces which are welcoming, convenient to use and attractive.

202. Seating, tree planting, landscaping, refreshed materials and spill out space for ground floor occupiers will enliven and animate the public realm, which is currently tired and underutilised. The re-invigorated courtyard has been designed to facilitate pedestrian movement through the space, whilst providing opportunities to dwell and spend time, with an enhanced level of greening. Utilities connections for market stalls would be provided, subject to condition, to allow food and beverage kiosks to provide further vibrancy and activity within the area.
203. The design and appearance of the proposals has been developed to give a sense of public access when viewed from the surrounding streets and spaces. The east-west connections, either side of 65 Old Broad Street, would be open to the air, the key architectural move to separate 65 Old Broad Street and 55 Old Broad Street by removing the existing building overhangs would improve the level of daylight and improve views into the central public space, encouraging activity and pedestrian movement. Generally, the proposed buildings would create spaces that are comfortable in terms of wind, thermal comfort and daylight. 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 providing shading and protection from inclement weather where possible, enhancing the existing outdoor public realm and local ground level views.
204. The existing stepped space, to the west of the Bath House and north of Barclays, would be lowered and would sit flush with the rest of the public realm, giving seamless level access, this greatly improves the quantity and quality of public space available and accessible to the public. Currently, the space above the steps is quite large and inaccessible, greatly restricting the openness and size of the space, it also prohibits the building having a positive relationship with the public realm, this issue would be remedied by the proposals.
205. The lower floors would be transformed to be outward facing and visually permeable, encouraging positive relations between the ground floor uses and the adjacent public realm, the base would be an integral part of the arrival experience from all directions. The façade treatments at ground floor level are well-suited to pedestrian desire lines and sightlines, particular care and attention has been paid to meet the needs of pedestrians and cyclists, the most sustainable transport modes. The prominent and attractive cycle hub entrance would be accessible and visible to cyclists arriving at the site, providing high quality facilities which would promote active travel.

206. The proposed building line would step out slightly onto Old Broad Street, in addition, a substantial increase in floor space would generate a significant amount of pedestrian footfall along an already constrained footway, as a result, the proposals would be subject to a s278 agreement, which would seek to mitigate the impact of the development by implementing pavement widening and improved pedestrian crossing facilities on key junctions and pedestrian desire lines, as outline in the transport assessment and road safety audit. This would deliver improved pedestrian infrastructure, prioritising the needs of pedestrians and cyclists. It is considered that the proposals would make a positive contribution to the accessibility and inclusivity of the area in a local context.
207. The publicly accessible uses would be prominent and visible to passers-by, particularly the public house, makers spaces/studios and the retail/café, their location has been thoughtfully positioned to be obvious and legible to potential users with appropriate signage and wayfinding measures to ensure entrances are clearly legible, the details of which are reserved for condition. In addition, provision of legible London signage and TfL underground signage would be secured through condition.
208. Altogether, the proposals would provide high quality public realm, alongside more pedestrian-focused streets which promote active travel and are comfortable, convenient and attractive, in accordance with London Plan Policy D3 and City Plan Policy S8.
209. Active frontage would be focussed on the sites periphery, with some inward facing activation around the central public space. The mixed use nature of the proposals would result in a positive contribution to the vibrancy and activity of the area, offering social and economic benefits. The provision of mixed uses, with an active ground floor and dwell space would promote activity 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.
210. The proposed public house has been designed to reflect the character and appearance of a typical pub, in a contemporary and refined manner. The use of glazed red bricks and characterful detailing would make a positive contribution to its surroundings, with a defined spill out area which would contain customers, whilst adding vibrancy and activity in the public realm. As previously mentioned, the cycle parking facilities would have an attractive and

open façade, encouraging its use. The office facades would have dense landscaping and greening behind the well detailed and attractive glazing, to create a visually interesting and engaging façade which could have otherwise been inactive and sterile. The facades along London Wall have typical shopfront proportions, with a contemporary twist, finally, the Bath House would have improved surrounds, with the public realm making a positive contribution to its setting. Overall, it is considered that in association with the uses, their disposition, the layout of the proposed buildings and the façade design would deliver positive relations between what happens inside the building and outside in the public realm. Facades which define and activate their surroundings in a well-designed and attractive manner are considered to be in accordance with London Plan Policy D3 and D8, Local Plan Policies CS 10(3) and DM 10.1(Bullet 5) and City Plan Policies S8(6) and DE2(2,Bullet 4).

211. An appropriate management of the public realm, both internal and external, would be secured via section 106. A Public Realm Management Plan 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.
212. Hostile Vehicle Mitigation (HVM) has been minimised, replacing the existing measures on site. The existing gate would be replaced with retractable bollards, the bollards have positioned to not obstruct pedestrian movement in a north-south direction along the eastern footway of Old Broad Street.
213. The proposed servicing strategy would utilise the existing servicing ramp and basement, servicing access would be restricted to [11pm to 7am – check what has been agreed], to minimise any potential conflict between vehicles and pedestrians. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality, with minimal disturbance or inconvenience of the surrounding public realm.
214. The proposal would deliver green infrastructure, optimising the quantum and planting pallet in a manner which is human-centred, seeking to improve health and wellbeing, two large trees in the centre of the public space would transform what is currently a hardscaped environment. Final details, including planting palettes, specifications and fit out, are reserved for condition with the intent to optimise the inherent biodiversity and wellbeing benefits.



215. The proposed materials would be robust and high quality, with the final detail of surface materials and specification of street furniture reserved for condition. The use of Yorkstone paving in the public realm would read as a continuation of the surface treatment on adjacent streets and spaces. This would suggest to pedestrians that the space is publicly accessible. The routes and alleys through the building would have elevations and soffits finished in high quality and attractive materials, which are reflective of the city's characterful routes and alleys. The surface treatment around the bathhouse has been designed to be expressive and colourful, celebrating its quirky aesthetic, although the final details would be reserved for condition. 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.
216. 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.
217. Appropriate lighting, in accordance with Local Plan Policy DM 10.1 and City Plan Policies S8(11), DE3 and DE9, would deliver a sensitive and co-ordinated lighting strategy integrated into the overall design, minimising light pollution, respect context and enhance the unique character of the City by night. A detailed Lighting Strategy would be subject to condition to ensure final detail, including from, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with guidance in the City Lighting Strategy. The final design will deliver low level and architectural illumination which enhances the pedestrian experience.

### **Summary (Public Realm)**

218. Overall, the proposal would optimise the use of land to deliver a transformative new mixed-use destination for Liverpool Street. It would result in a diverse mix of use, with curated and programmed publicly accessible spaces, both internal and external, transforming an underutilised site, with little active ground floor uses and underwhelming public realm, to a new commercial and cultural hub for the City and London. It would marry commerce and culture in an engaging way which would activate and animate the new public spaces. It would deliver an improvement in both quantity and quality in new public space, enhancing convenience, comfort and attractiveness in a manner which optimises active travel and the City's public realm objectives.

## **Heritage and Strategic Views**

219. 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. These policies seek to implement the Mayor's London View Management Framework (LVMF) SPG, protect and enhance views of historic City Landmarks and Skyline Features and secure an 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).

### **220. Tower of London World Heritage Site**

221. The site is not located within the Local Setting of the Tower of London and the proposal would share no intervisibility with the World Heritage Site in any of the Representative Views identified in the LVMF or the Local Setting Study. The Zone of Theoretical Influence (ZVI, p. 345 of the THVIA) shows that there would be no intervisibility between the proposed development and the WHS, including its local setting area, as can also be seen in View A7 LVMF 10A.1 Tower Bridge where the development is not visible.

### **London View Management Framework Impacts**

222. The LVMF designates pan-London views deemed to contribute to the Capital's identity and character at a strategic level. The site is partly 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 that it signposts the historic commercial and economic heart of the Capital within the wider socio-economic and cultural topography of London.

223. Being partly within the City Cluster of tall buildings, the proposal is sited to avoid conflicting with designated Protected Vistas towards Strategically Important

Landmarks (SILs), including St Paul's Cathedral and the Tower of London (ToL). However, it would be visible from several identified views, in particular several River Prospects and also to comparatively slight degrees in the London Panoramas. These are assessed in order of magnitude of impact below.

224. For clarity, the proposals would not be visible from LVMF 2 Parliament Hill; LVMF 6 Blackheath Point; LVMF 7 The Mall to Buckingham Palace; LVMF 8 Westminster to St Paul's Cathedral; LVMF 9 King Henry VIII's Mound, Richmond to St Paul's Cathedral; LVMF 10 Tower Bridge; LVMF 11 London Bridge; LVMF 12 Southwark Bridge; LVMF 13 Millennium Bridge and Thameside at Tate Modern; LVMF 14 Blackfriars Bridge; LVMF 18 Westminster Bridge; LVMF 19 Lambeth 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; LVMF 23 Bridge over the Serpentine, Hyde Park to Westminster; LVMF 24 Island Gardens, Isle of Dogs to Royal Naval College; LVMF 25 The Queen's Walk to Tower of London; LVMF 26 St James' Park to Horse Guards Road; and LVMF 27 Parliament Square to Palace of Westminster. Therefore, impact of the proposal in these views are not assessed.
225. In addition, LVMF views from the following assessment points in which the Proposed Development would have negligible visibility are included in the HTVIA Appendix A (wireline verified views) and Appendix B (computer modelled images) respectively – 1A.1 and 1A.2 (Alexandra Palace), , 3A.1 (Kenwood), 4A.1 (Primrose Hill) and 5A.2 (Greenwich Park),
226. The Proposed Development would be visible in the following LVMF views for which verified images have been produced and included in the HTVIA:
- Views 15B.1 and 15B.2 from Waterloo Bridge;
  - Views 16B.1 and 16B.2 from Gabriel's Wharf; and
  - Views 17B.1 and 17B.2 from Hungerford Bridge.

*LVMF River Prospects:*

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

227. 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 of the view 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.

228. From 15B.1, in baseline and cumulative scenarios, in winter and summer views, the proposed new tall building would be partially visible to the left of Angel Court and to the right of St. Paul's Cathedral. The taller element of the new building would appear in front of Nido Spitalfields, rising to the same apparent height as that building and occupying its silhouette, leaving only the BMU of that building visible. The lower part of the new building would appear in front of Dashwood House, occluding that building but rising to a slightly higher level, which would consume a small section of open sky alongside the base of the drum. While the scheme has been slightly amended to mitigate this visual intrusion (through amendments to the rooftop balustrade), and this lower part of the new building would remain below the level of the base of the Cathedral's peristyle, a very small part of clear sky would be infilled.
229. This inconsistency with LVMF guidance has also been identified by Historic England, the Surveyor to St Pauls Cathedral and the Georgian Group. Following minor amendments to the proposal to minimise any infilling of the sky gap about the Cathedral. SAVE Britain's Heritage state that: "*This development would be visible behind the dome of St Paul's Cathedral as viewed from Waterloo Bridge which has been designated as the strategic view 15B.1 in the London View Management Framework (LVMF)*". It must be clarified, however, that the proposed development would not be visible behind the dome, only alongside the drum.
230. It is not considered that the proposal would draw tall buildings closer to St Paul's Cathedral, dominate it or cause a 'canyon effect' around the Cathedral (para 264). It would however affect its clear sky backdrop to a very small extent. This would only be perceptible from a great distance and only from this Assessment Point. While this infill is not such that it would obscure or detract from the Cathedral as an identified landmark element in the view, the clear sky space around the Cathedral in all views is considered highly sensitive and fundamental to appreciate the significance of its skyline features. Although the loss of clear sky adjacent to the drum is very slight, it is considered that this would still amount to a very minor incursion into the Cathedral's clear sky setting

and therefore would fail, to a slight degree, to preserve or enhance the Cathedral's relationship with its clear sky background, conflicting with this part of the guidance in para 264 of the SPG. The proposal would otherwise preserve the characteristics and composition of the view and the ability to appreciate other identified landmark elements.

231. The southern elevation of the proposed tall building would exhibit a materiality and cool tone that offers a lighter and more harmonious counterpart to St. Paul's Cathedral on the skyline, in contrast to the materiality and darker colouration of the Nido Spitalfields building. This choice of materials would relate the new building to the tonal qualities of structures within the City Cluster while it would complement without detracting from the architecture and materiality of the Cathedral. The elevations would follow a regular pattern, presenting the proposal as a well-ordered and unpretentious addition to the skyline near the Cathedral. It would maintain a significantly lower apparent height than neighbouring structures, such as Angel Court to its right in the image, and notably lower than buildings like 110 Bishopsgate, Tower 42, and 22 Bishopsgate. This contributes to a cohesive progression in height on the skyline, moving from the north and west (left) toward the central City Cluster in the east and south of the site (right). Overall, it is considered that the proposals would not compete with the prominence of St. Paul's Cathedral or hinder viewers from recognising and admiring this Strategically Important Landmark. Instead, it would seamlessly integrate with the existing development pattern within the City Cluster.
  
232. However, through the very minor incursion into the Cathedral's clear sky setting at Assessment Point 15B.1, the proposals would depart from the relevant part of the guidance in para 264 of the LVMF SPG.
  
233. As the viewer walks south towards 15B.2 (and beyond), the Cluster moves away from the Cathedral, opening up the strategic skyline gap between the City Cluster and a group of taller buildings to the north. Between section 15B.1 and 15B.2, the proposal briefly disappears from sight as it is concealed behind an existing building. It re-emerges and becomes partly visible again from Assessment Point 15B.2, located to the left of Angel Court and to the right of the Unilever Building. In this segment of the view, the apparent height of the proposed tall building would be notably lower than both the existing buildings, particularly Angel Court, ensuring that it would not affect the visual gap between St. Paul's Cathedral and the tall structures in the City Cluster. In this view, from 15B.2, the proposal would preserve the visual dominance of St. Paul's

Cathedral, and it would not overwhelm the Cathedral or hinder the viewer's ability to recognise and appreciate this Strategically Important Landmark.

234. To the extent it is visible, the proposal appears to merge well and complement the urban fabric within the City Cluster from this Assessment Point. It would form part of a coherent descent in building heights, starting from the peak of the cluster represented by 22 Bishopsgate, moving north and west through the lower buildings of 125 Old Broad Street, 99 Bishopsgate, and Angel Court, to the proposed development.
235. The development has been designed in accordance with the details and technical requirements of the draft Lighting SPD and the Corporate Lighting Strategy. Nocturnally, the overall character of LVMF 15B.1- 2 would be preserved by the proposal, with the contrast between the modern towers within the City cluster and the illuminated dome and peristyle of St Paul's Cathedral. However, in 15B.1, the proposal would introduce a degree of illumination not present in the existing view and thus would have the potential to compete with the prominence of the Cathedral in this view. Although the proposal, and specifically the façade visible, in these views has been designed to minimise light pollution from internal and external lighting, there remains the potential for a degree of illumination here that could compete with the presence of the Cathedral, albeit in a very minor way. Conditions have been proposed to manage and mitigate this as far as is practicable. There would be no other form of external lighting that will be visible in these views in relation to the proposed development.
236. 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.

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

237. 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.
238. 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.
239. The proposal would introduce a very small change to the views from 16B.1 and 16B.2, in baseline and cumulative scenarios, with the new building being partially visible behind Angel Court. The lower and higher parts of the proposal would appear to the left and right respectively of Angel Court, in both cases at a considerably lower apparent height than that existing building. It would be slightly more visible from 16B.2 however, as seen from both assessment points, the proposal would contribute to the development of the existing and emerging Cluster of tall buildings, slightly drawing in Angel Court, preserving the townscape setting of St Paul's whilst not detracting from wider landmarks in the view.
240. The proposal would appear partly behind the spire of St Benet Paul's Wharf from 16B.1 and directly behind it from 16B.2. However, the extreme distance of this viewpoint, the lower height of the spire in this view and its already constrained and altered context within it appears is such that the church is not identified as a contributor within the LVMF SPD, either a 'landmark' or within the supporting text. As such the change in its background as a result of the proposal is not considered to reach a sufficient threshold to create harmful impact on an appreciation of the church as a skyline feature within this view.



241. 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.
242. Please see additional assessment within the City Landmarks and Skyline Features and designated assets sections below.

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

243. 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 identified as the Strategically Important Landmark and centrepiece of the view.
244. From 17B.1, in baseline and cumulative scenarios, only a very small part of the proposal would be visible. It would appear as a vertical sliver, to the left side of Angel Court and behind and to the left of the tower of St. Mary-le-Bow Church. The tower of St. Mary-le-Bow Church is already visible with Angel Court behind it, and the potential visibility of a small portion of the proposed development behind the Church would not alter the way this view is perceived or appreciated, especially as it would be seen at a great distance from this Assessment Point.
245. From 17B.2, the proposed development would be visible to the left of Angel Court, at a much lower apparent height than that existing building. It would be barely discernible at this distance as it would not rise higher than the existing building of Dashwood House, already visible in this view. As such there would be no change in the way that the church of St. Mary-le-Bow is appreciated in this view.
246. Due to the relative low height of the proposal and its very limited visibility in this view, behind and adjacent to Angel Court, an existing tall building, the proposal would preserve the setting of St Paul's Cathedral within the view and would not obscure or detract from a landmark feature or any other buildings identified in the relevant visual management guidance of this view in paras 301-305 and 57 of the SPG. The proposal would have a neutral impact on the view overall.

## **LVMF – London Panoramas**

247. LVMF views from A.1 and 1A.2 (Alexandra Palace) - Views A2 and A26 in the THVIA
248. 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.
249. In both of these views, in the baseline and cumulative, a very small part of the proposed development (upper part) would be visible. This additional built form would appear as part of the consolidated City Cluster and at a lower height than existing tall buildings, to the left, right and behind of the proposed development (as seen in these views). The proposed development would preserve the characteristics and composition of the identified landmarks in views from these viewpoints, including St Paul's Cathedral, The London Eye, BT Tower and The Shard. The proposed development would have a neutral impact on this view.
250. In the cumulative scenario, additional buildings, some considerably taller than the proposed development would be visible in these views, including the resolution to grant scheme (RTG) of 55 Bishopsgate. In the cumulative scenario, the proposed development would continue to have a neutral impact on this view.
251. LVMF 3A.1 (Kenwood) - A28 in the LVMF
252. A deep panorama from one of the finest historic homes in North London, in which the existing City Cluster is an eye-catching orientation point. In this view, in baseline and cumulative scenarios, a very small part of the proposed development (upper part) would be visible. This additional built form would appear, approximately at the front of 30 St Mary Axe in this view, and would be seen as part of the dense City Cluster. It would be of a lower height than most of the existing tall buildings, including 30 St Mary Axe. The proposed development would preserve the characteristics and composition of the identified landmarks in this views, including St Paul's Cathedral, Palace of Westminster (The Clock Tower), The London Eye, BT Tower and The Shard. The proposed development would have a neutral impact on this view.

253. 4A.1 (Primrose Hill) - View A3 in the THVIA

254. A spectacular panorama comparatively close to Central London and showing the capital in close detail. In this view, a sliver of the proposed development (upper part) would be visible. This additional built form would appear, on top of existing buildings, between 110 Bishopsgate and 100 Bishopsgate which are of considerable additional height on relation to the proposed development. The proposed development, in baseline and cumulative scenarios, would make a negligible addition to an established group of mostly taller buildings and its scale would be compatible with the composition of the view. It would preserve the characteristics and contribution of the identified landmarks in this view, including St Paul's Cathedral, Palace of Westminster, BT Tower, The London Eye, and The Shard. The proposed development would have a neutral impact on this view

255. 5A.2 (Greenwich Park) - View A4 in the THVIA

256. This is a seminal London view of great historical significance allowing one of the most comprehensive views of the capital. In this view, in baseline and cumulative scenarios, a small part of the proposed development (upper part) would be visible. This additional built form would infill a very small part of the existing gap between 110 Bishopsgate and 100 Bishopsgate that rise to a much more additional height than the proposed development. Although to a very small scale, the proposed development would contribute to the consolidation of the existing Cluster of tall buildings in the City, as per paragraph 146 of the LVMF guidance. The proposed development would preserve the characteristics and composition of the identified landmarks in this view, including St Paul's Cathedral, Maritime Greenwich, Greenwich Observatory, Tower Bridge, The Monument, Millennium Dome and The Shard.

#### Summary of LVMF Impacts

257. On balance, the proposals would result in a slight level of harm to the setting of St Paul's Cathedral in LVMF 15B.1, through the minor incursion into the clear sky setting of the Cathedral, although there would be no diminishment of its prominence or landmark quality with the view, the ability to recognise and appreciate St Paul's Cathedral as Strategically Important Landmark would be preserved overall. This impact has been mitigated as far as possible through design amendments; the nocturnal impact would be mitigated through

conditions on the lighting of the building. Nevertheless, the proposal would in this regard result in a slight degree of conflict with London Plan Policy HC4, Local Plan Policy CS13 (1 and 2) and emerging City Plan 2040 Policy S13.

### **City of London Strategic Views**

258. The development site is not situated within the St. Paul's Heights Policy Area, the Monument Views Policy Area. In terms of Historic City Landmarks and Skyline Features, two City Churches with a Skyline Presence, Church of All Hallows and St Botolph-without-Bishopsgate, are located within the local context of the proposed development. View of these church are included in the THVIA, including Views 12 and 13 of All Hallows, and Views 21-23 of St. Botolph's. Additionally, the towers of several other City Churches with a Skyline Presence that are located further afield may be seen in conjunction with the proposed development in more distant views from the River Thames. These include St. Benet Paul's Wharf, St. Mary-le-Bow Cheapside, St. Nicholas Cole Abbey, and St. Paul's Cathedral. These buildings are incorporated in Views 1-7 of the THVIA.

### **Monument Views**

259. 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.

#### Views from the Monument

260. The proposal would not be sited in the Monument Views Policy Area and would be outside the field of view of identified Views 1-5 from the Viewing Gallery, which would be preserved.
261. 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.
262. The proposal would allow an unbroken view north along Gracechurch Street/Bishopsgate towards Gibson Hall. The proposal would appear in front of Dashwood House in this view, at a slightly increased height (24 instead of 19

storeys above ground floor level). The overall dynamic of the taller buildings in the Cluster would be retained. The proposed development would screen an existing tall building and due to its high quality design and architecture is considered that would enhance this view.

#### Views of and Approaches to the Monument

263. The proposal would not be in the 'Immediate Setting' of the Monument, as defined in the Protected Views SPD, leaving it preserved in accordance with the guidance at paragraphs 4.16-17 of the SPD. The proposed development would not be visible in any of the identified 'Views along Street Axes'.

#### Conclusion on the Monument

264. In summary, the proposal would preserve 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**

265. The site is situated at a distance of approximately 1 km to the north-east of St. Paul's Cathedral, and there is no intervisibility between the development site and the area surrounding the Cathedral or along the processional route to St. Paul's
266. Cathedral from the west along Fleet Street. The proposal would not be visible and would be out of scope of most of the identified Viewing Points of St Paul's identified in the Protected Views SPD (Figure 3).
267. It would be visible in the kinetic riparian sequences along the Thames bridges and from the South Bank Queen's Walk, in particular in those orientated towards the Cathedral between Hungerford and Millennium Bridges.
268. 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.
269. Overall, the proposal has been designed to protect and enhance local views of St Paul's Cathedral, its setting and backdrop... From Waterloo Bridge there be some very minor change in the relationship between the Cluster and the Cathedral. This would result in a very slight erosion in the setting of the

Cathedral. In this isolated experience 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 areas, in particular the 'Sky Garden' at 20 Fenchurch Street**

270. 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.
271. 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 proposed development would not impact the open experience of the south terrace, or the quality of the microclimate. In terms of northerly views, the proposed development in the existing and cumulative scenarios would be screened by taller and dense development in the Cluster. The proposals are therefore considered to preserve the public enjoyment in views from the Garden
272. In terms of views from One New Change, St Paul's Cathedral, to the south-west, is the primary viewing experience, and the City cluster is more peripheral. The proposed development would be partially visible towards the northern edge of the Cluster. It would be lower than the buildings within the Cluster and in keeping with the cascading view of the existing tall buildings. There would be no impact on the view of the spire of St Mary le Bow or any other elements of this view. The overall viewing experience would be preserved.
273. In terms of the newly opened viewing gallery at 8 Bishopsgate, it is likely that there would be some very limited visibility of the proposed development. However, the development would be mostly screened by 22 Bishopsgate and Tower 42 which are considerably taller than the proposed development. In the cumulative scenario, RTG 55 Bishopsgate would add additional screening in any potential views of the proposed development. In any case, 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. The viewing experience would be preserved.

## Other Borough Strategic Views

274. London Borough of Islington:
275. 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.
276. From Views LV 4-5, from Archway Road/Bridge, provide good panoramas of central London from an elevated position on rising hills along a principal artery and historic arrival point to London. The strategic siting of the City Cluster is clear, set away from St Paul's which would not be impinged upon. Where the Cluster is visible behind the rich foliage framing these views, it draws the attention of the viewer to the location of the City and commercial core of London, assisting in their recognition of St Paul's within the wider panorama. A very small part of the proposed development would be visible in between existing and cumulative schemes, including the RTG 55 Bishopsgate. Where visible, the proposed development would add small layer of building fabric to the existing buildings which comprise the Eastern Cluster, approximately in the middle of the Cluster. It would be almost indiscernible among the surrounding buildings, and would not protrude vertically or horizontally from the established Cluster of buildings.
277. Overall, the proposal would protect Views LV1-LV8 in accordance with Policy DM 2.4. No objections have been raised in relation to Local Views.
278. There have been no objections from other borough in relation to the proposed development. Some views have been tested and included in the THVIA. Due to the modest height of the proposed development, its location next to an established group of tall buildings, as well as intervening topography and built form, it is unlikely that the proposed development would appear prominent, if at all, in any of these views. This includes View 22 (Westminster reference, View A29 THVIA reference) from the Somerset House terrace in Westminster, where the proposed development would not be visible.
279. As such, it is considered that there would be no negative impacts, in baseline and cumulative scenarios, on any strategic views from other boroughs.



## **City Landmarks and Skyline Features, Views Of:**

280. The proposal would appear in views of historic City Landmarks and Skyline Features which, in accordance with CS13, 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 Paul's Cathedral:*

281. The impact of the proposal on St Paul's Cathedral is assessed in detail in the LVMF section of the report above and also in the Designated Heritage Assets section below.
282. St Paul's Cathedral is a Strategically Important Landmark, 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 other Wren churches. It has a wider, pan-London skyline presence that is identified in the aforementioned London Panoramas in the LVMF and other locally designated views
283. In baseline and cumulative scenarios, Officers consider that the proposals would introduce a small degree of change in some views of the Cathedral. In most cases, this change would be of very small scale and would not diminish an appreciation of St Paul's Cathedral as a skyline landmark. However, in the views from Waterloo Bridge at LVMF 15B.1, there would be a very minor encroachment into the sky gap between the Cathedral and existing tall development to the right of this view. This has the potential to affect, to a very small degree, the ability to appreciate its defining silhouette from this Assessment Point. This would only be visible for a fleeting moment and from a great distance. For the reasons set out in the LVMF section above, this would very slightly diminish views of the Cathedral from this point.

### *Church of All Hallows, London Wall (Grade I)*

284. The impact of the proposal on the Church of All Hallows is assessed in detail in the Designated Heritage Assets section below.
285. In baseline and cumulative scenarios, the proposed development would be visible in views looking east at the Church (including Views 12 and 13 of the THVIA), and in some cases directly behind it. The proposed development would be taller than the existing building it would replace. However, Officers consider this change to be consistent with how existing tall buildings in the background and within the City Cluster currently contribute to these views, providing a backdrop of tall buildings. Thus, the skyline presence of this City Landmark would be preserved.

#### *St Botolph-without-Bishopsgate*

286. The impact of the proposal on St Botolph's-without-Bishopsgate is assessed in detail in the Designated Heritage Assets section below.
287. The proposals would be seen together with St Botolph-without-Bishopsgate in views from Bishopsgate (particularly Views 21 – 23 in the THVIA). However, in all scenarios, Officers consider this change to be consistent with how existing tall buildings in the background of the Church currently contribute to these views, providing a backdrop of tall buildings. In the cumulative scenario, the RTG 55 Bishopsgate would appear considerably taller to the rear of 99 Bishopsgate to the south-east, without affecting however the visibility of the asset in this view and its relationship with the proposed development. Thus, the skyline presence of this City Landmark would be preserved.

#### *St. Benet Paul's Wharf*

288. The impact of the proposal on St Benet Paul's Wharf is assessed in detail in the Designated Heritage Assets section below.
289. The proposed development would be seen in views from the River Thames that include the tower of St Benet Paul's Wharf, including Views 1, 2, 4, 5 and 6 in the THVIA. In View 6, the proposed development would appear directly behind the church tower. Officers consider that, in all scenarios, the proposed development would add a new development that would be entirely consistent with the existing character of the views of the church which is seen in the context of other tall buildings. Thus, the skyline presence of this City Landmark

is not considered to be affected by the proposals and views of it would be preserved

*St. Mary-le- Bow Cheapside*

290. The impact of the proposal on St Mary-le-Bow is assessed in detail in the Designated Heritage Assets section below.
291. The proposed development would be seen in views from the River Thames that include the Church tower and the Proposed, such as Views 1, 2, 4 and 5 included in the THVIA. In such views, the Church tower is seen in the context of much larger modern development within the City Cluster, and often with modern development directly behind it. The proposed development would appear partially behind the Church tower in Views 1 and 2. Officers consider that in baseline and cumulative scenarios the proposed development would add a new development that would be consistent with the existing character of the views of the church which is seen in the context of other tall buildings. Thus, the skyline presence of this City Landmark is not considered to be affected by the proposals and views of it would be preserved.

*St. Nicholas Cole Abbey*

292. The impact of the proposal on St Nicholas Cole Abbey is assessed in detail in the Designated Heritage Assets section below.
293. The proposed development would be visible in views from the River Thames that include the church tower, specifically Views 1, 2, 3, 4, 5, 6, and 7 included in the THVIA. In such views, the church tower is situated within the context of much larger modern development within the City Cluster. Frequently, this modern development appears directly behind the Church tower. From these vantage points, in baseline and cumulative scenarios, the proposed development would appear as a relatively modest addition to the overall scene where it is seen alongside the Church tower. In View 7, the proposed development would appear behind the Church tower. However, Angel Court also appears behind the church tower in this view and the proposed development would form part of an established group of tall buildings in the background of the church. Thus, it is not considered that there would be a qualitative change to the character of these views or the prominence of the

church and the skyline presence of this City Landmark and views of it would be preserved.

294. Conclusion on City Landmarks and Skyline Features

295. The proposal would largely preserve views of all other relevant City Landmarks and Skyline Features with the exception of the very minor encroachment into the sky gap around St Paul's Cathedral with . This would result in some minor conflict with part of CS 13(2).

**Conclusion on Strategic Views**

296. The proposal has been sited at the north-west edge of 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 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.

297. The proposal would result in very minor conflict with CS13 (1 and 2) through the way in which it would result in a very minor incursion into the clear sky setting of the Cathedral in LVMF 15B.1, failing, to a slight degree, to preserve or enhance the relationship between the Cathedral and its clear sky background and resulting in very slight diminishment of it as a skyline landmark.

298. Overall, the proposal satisfies CS12 (3) as it relates to the ToL WHS, but would result in some very minor conflict with Local Plan policy CS13 (1 and 2), emerging City Plan policy S13, London Plan policy HC4, the LVMF SPG and the City of London Protected Views SPD.

**Heritage**

**Designated Heritage Assets**

299. Comments have been received from the Surveyor to the Fabric of St Paul's, Historic England, the Victorian Society, the Georgian Group, SAVE Britain's Heritage, London and Middlesex Archaeological Society and the Twentieth Century Society. The main points are:

- Impact on St Paul's Cathedral (including Suitability for Location of Tall Building, and Height of Lower Element of the Scheme & Erosion of the sky gap in relation to 15B.1)

- Impact on St Botolph's Bishopsgate
  - Impact on Church of All Hallows
  - Impact on the Bath House
  - Loss of part of wall from the former New Broad Street House, attached to the Bath House
  - Impact on Great Eastern Hotel
  - Impact on New Broadgate Conservation Area
  - Impact on Bishopsgate Conservation Area
  - Lack of LBC with the original application
  - Loss of the elevated walkway
300. Officers have considered these representations carefully and afforded them considerable importance and weight. There is some consensus, but clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.

### **Designated Heritage Assets – Direct Impact**

#### **8 Bishopsgate (Victorian Bath House, Grade II)**

301. Bath House by S. Harold Elphick, in an elaborate Islamic style and constructed in 1894-5 for James Forder Nevill. It is constructed of a combination of materials, including faience tiles, terracotta, and brick. It includes the highly decorative original polygonal apse at the eastern end, with a copper octagonal lantern on top, with stained glass lights and a projecting bracketed cornice, crowned by a coloured glass onion-shaped dome with a metal finial featuring a star and crescent spire. The original entrance is located on the north elevation, close to the eastern end, featuring an intricate terracotta door frame with attached columns and a multifoil arch. The north-west corner, west side, and south facade all date from the 1970s and 80s and are constructed with modern engineering bricks. They are notably of a simpler design than the ornate eastern end. The south elevation is more utilitarian in appearance and incorporates a modern ventilation grill. This side of the building incorporates part of white-glazed brick wall that seems to align with the eastern boundary of the previously demolished Broad Street House. The lavish interiors, although now altered to some extent, are of interest for their quality and distinctive Islamic-styled tiles designed by Elphick.

#### *Significance*

302. The significance of the Bath House primarily arises from its architectural and historic interest as a purpose-built Victorian Turkish Bath House in the City, specifically built on a very constrained site. The small eye-catching kiosk on the ground floor was designed to advertise its much larger subterranean space. Architectural interest is also derived from the appreciation of its unique and highly elaborate Islamic style and decorative features, externally and internally. This is manifested in features such as the elaborate octagonal apse on the eastern end and glass onion dome as well as the use of rich terracotta and faience finishes. Although the Bath House has undergone considerable changes to its form and setting, it still retains much of its high-quality design and architectural features. The truncated wall, likely part of the New Broad Street House (former building at 55 Old Broad Street) is only considered to be a fragment of the original setting of the Bath House with much of its context now removed.

### *Setting*

303. The setting of the Bathhouse has changed dramatically over the years. Initially it formed a ground floor extension projecting outward from the corner of New Broad Street House, located within an exceptionally cramped urban environment, tightly enclosed by neighbouring structures on all sides. During the 1970s, the Bath House was transformed into a standalone structure, preserving much of its original Victorian exterior, with supplementary additions made to the north-west corner, western, and southern facades. Its principal approach from the east was and remains open with views of the polygonal apse and cupola when approaching from St Botolph's Churchyard. These are considered to be the most important views of the asset and the only element of setting to contribute to its significance.
304. Otherwise, although the Bath House remains enclosed by modern buildings to the south, north and west, the modernity of these buildings and the complicated level changes surrounding the listed building mean that it derives no significance from these other elements of setting.

### *Impact*

305. The proposal would directly affect the Bath House, through material changes to its exterior and interior, as well as indirectly affect it by introducing changes to its setting.

## Objections/Comments

306. Historic England, the Victorian Society, SAVE Britain's Heritage, Historic Buildings and Places and the London and Middlesex Archaeological Society as well as members of the public have identified harm to this asset, as a result of the proposed development in their consultation responses. Their comments can be found in the Statutory Consultation section above.
307. It is worth noting that a lot of the consultation responses highlighted the lack of an LBC submission when the full planning applications was submitted. A LBC application was submitted on 6<sup>th</sup> September 2023 and will be decided together with this full application.

### External alterations to the Bath House

308. The proposed external alterations to the Bath House include the demolition of the non-original west and south elevations; demolition of the part of the wall likely to survive from the New Broad Street House attached to the south elevation; repair and redecoration of the western part of the north elevation; replacement of the western elevation and incorporation of new door; provision of new glazed link to the south, enclosing the part of the south façade that would be demolished; removal of non-original cornice and replacement with new, replicating original cornice; replacement of glazing of modern windows at the north elevation with coloured glass, continuing original patterns; new tiling to the north-west and west elevations to continue the pattern of the original tiling at the eastern part; repairs of damaged tiling and as appropriate.
309. The removal of the non-original, late 20<sup>th</sup> century additions from the external elevations of the Bath House is acceptable in principle and supported by Historic England. The demolition works would relate to the parts at the west, and south facades that date from the late 20<sup>th</sup> century. These parts of the building were never part of the original design, as the building was attached to a now demolished row of buildings on the site. As such no harm has been identified by their removal. Similarly, the removal of inappropriate modern additions, including the concrete rendering on the north façade would also be acceptable.



310. The proposed new façade elements would follow a slightly different floor plan arrangement than the existing, resulting in a rectangular plan for the main part (without the glazed link), instead of an L shape. The part that would be demolished in the southern elevation would not be replaced, it would instead remain open and enclosed by the new glazed link. Since, originally, this part of the building did not exist, not replacing it would be acceptable and not harmful to the significance of the building which derives from the original parts of the building that survive.
311. The proposed green roof is considered acceptable in principle as it would enliven a utilitarian part of the building, without detracting from the special architectural or historic interest of the building. Conditions will be added in relation to the proposed green roof to ensure where additional design and servicing details would be required.
312. The proposed design for the new elements would be in keeping with the character and ornate style of the original part of the Bath House. Original features would be replicated and incorporated in the new parts of the building where appropriate. For example, modern parts of the ornate cornice and parapet would be replaced with accurate replicas to reflect the original cornice that survives on the east and part of the north elevation. Also, new tiling to reflect the original tiling at the eastern part would be applied to the north-west and west facades. The proposed new door at the west elevation would be of a new design but in keeping with the character and appearance for the Victorian building.
313. The proposed design and materials would be of high quality, secured via conditions, and an improvement on the late 20<sup>th</sup> century additions which include modern and inappropriate materials, including engineering brick, Glass-Reinforced Plastic and concrete rendering. These external alterations would not result in loss of original fabric or restore any original features but would still allow for the original Bath House to be experienced and understood and would preserve the significance of the Bath House.

#### Internal alterations

314. The proposed internal works would focus on removing modern fabric while respecting original features and spaces. At ground floor level, the proposed works would be in the western part of the building and would relate to the

provision of a new entrance arrangement, including a new glazed link and platform lift, both of which would be outside the original footprint of the building.

315. At Basement 1, the principal space of the Bath House, the proposed works would be located in the western part, removing modern partitions and realigning the south-western part of the building, for its basement plan to be rectangular, similar to the original, Victorian arrangement. There would also be some works associated with the new platform lift and accessible WC. These would be located outside the original Victorian fabric, and would not affect any original features, as discussed above, while providing inclusive access to the basement area. No intrusive works are proposed at Basement 2 where the existing floorplan would be preserved.
316. A Strategy of Heritage Conservation and Repairs has been provided by the Applicant to form a basis for potential repairs, reinstatement and new work to the listed building.
317. Consultation response from Historic Buildings and Places includes comments for the internal alterations, in terms of the accessible WC and lift; ceiling structure of the basement; new M&E equipment and service runs; wall finishes around the remaining pillars; and potential conflicts and issues with the proposed pavement lights and the proposed exhibition space below. Officers have considered these points, in terms of the lift and accessible WC, they would be located outside of the original Victorian footprint, in a less sensitive area. In terms of the remaining points, details of which will be secured by relevant conditions. Intrusive investigations would be carried out to inform us about the extent of survival of the original ceiling. This would inform the introduction of any pavement lights and interaction with the space below.
318. Historic England states that:” *The proposed internal alterations are generally minimal and unlikely to affect historic fabric, but further investigative work would be necessary in order to understand this fully.*”
319. A Strategy of Heritage Conservation and Repairs has been provided by the Applicant to form a basis for potential repairs, reinstatement and new work to the listed building. Officers consider this a sound basis from which to approach the detailed design and materiality of these works, which would be secured via conditions.
320. Additional conditions would identify the need for surveys and method statements that may be required before carrying out any relevant works. The

need for intrusive works to fully understand whether original fabric may be covered under modern alterations, including the ceiling of Basement 1, as well as the extent and method for such works would also be secured via a condition. Servicing and Fire Strategy details will also be secured by relevant conditions.

321. Officers considered that the LBC application sets out proposed alterations to the listed building which would preserve the significance, and that the proposed conditions would represent appropriate and appropriate measures to secure the requisite, high-quality detailed design and materiality of these works.

#### Change within the setting of the listed building

322. It is proposed to provide a glazed link to the south of the building that would lead to a platform lift, located within the lobby of the new building at 55 Old Broad Street. Although interlinked, the Bath House would remain independent in terms of function and access from the proposed tall building at 55.
323. During pre-application discussions with the applicants, Officers stressed the importance of allowing for level access to the basement, and main functional space of the Bath House. Alternative options to achieve this have been considered carefully. The limited space at the ground floor of the Bath House as well as the potential considerable loss of historic fabric and plan form that would have been associated with incorporation of a lift within the main part of the historic building resulted in this option not to be considered appropriate. The provision of an external link to house the new lift, outside the Victorian footprint of the basement (Figure 47 of the Built Heritage Assessment, submitted by the Applicants) was considered the least impactful. The design of this link is considered to be sensitive, to allow for the main part of the historic building to be appreciated, without obstructing any views of the Bath House, and reading as a contemporary, sympathetic addition. The provision of the café kiosk within the link is considered that would animate the space and draw interest when seen from the surrounding public realm.
324. Historic England states that: *“Locating the lift outboard of the baths original footprint minimise the loss of the historic fabric and planform and is sensitive to significance in this regard.”* Officers agree with Historic England’s position that the inclusion of the platform lift within the lobby footprint would minimise the loss of historic fabric and planform and is acceptable.

325. The consultation response from Historic Buildings and Places states that: “*The continued intrusion of the new building elements into the basement, such as the escalator pit and the revolving door pits.*” As mentioned above, the platform lift and associated pit would be located outside the original Victorian footprint. The revolving door pits would not affect the historic fabric of the Bath House as they would terminate above the basement.
326. In terms of Historic England’s comments on the café and loss of the wall likely to survive from New Broad Street House, “*The provision of the café in the glazed link would necessitate the demolition of the surviving wall of New Broad Street House. This would result in harm by eroding any remaining legibility of the baths historic setting and the particular design constraints that Elphick had to work with in realising his highly distinctive design.*”
327. Officers disagree that the removal of the surviving part of the wall believed to survive from the New Broad Street House would result in harm. The truncated wall that survives is not considered to be of intrinsic historic or architectural interest or to make any considerable contribution to our understanding of the Bath House. The small but prominent structure, through its form and elaborate design and materials would continue to be indicators of its originally constrained setting. Its new setting would continue to be constrained as it would be located in close proximity to the proposed new tall building on the site.
328. The proposed development includes the replacement of the existing building at 55 Old Broad Street with a taller building that would be closer to the Bath House with the new development partially oversailing over the historic building. Many of the comments and objections relate to the proximity and partial oversailing of the proposed new building, including comments from Historic England, Victorian Society London and Middlesex Archaeology Society and SAVE Britain’s Heritage.
329. Specifically SAVE states that “*The vastly increased scale and proximity of the proposed office block to the bath house, with its drastic cantilever, would only compound this harm. The resulting loss of light would make the historic building’s significance less appreciable.*” Historic England states that: “*We have identified some harm arising from the relationship of the proposed tall building, which would partly over sail the kiosk, diminishing its street presence.*”

330. The Victorian Society states that *“The combined proximity and scale of the proposed 23-storey building demonstrate a staggering lack of deference to the significance of this Grade II listed building. The building would dwarf and overshadow the heritage asset by partially cantilevering over it, essentially engulfing the building in an artificially lit, cave-like space. The ability to appreciate the outline of the lantern, a crucial architectural feature of the bath house meant to be seen in silhouette against the sky, would be greatly reduced. Furthermore, the proposal would greatly impact the ability to appreciate the heritage asset as separate from the proposed structure, reducing the bath house to an ornament in the lobby of a 23-storey building. The current space around the heritage asset allows for the full appreciation of its architectural interest, while the proposal would significantly diminish this.”*
331. The London and Middlesex Archaeological Society states that they have *“serious concerns over the adverse impact of the proposed new building on the setting of the Grade II-listed Bath House, which is also the subject of alterations in the planning application. Even the image on the front of Design and Access Statement (Part 1) makes it clear that the Bath House would be overwhelmed by the cantilevered first floor of the new building, drastically impacting its setting.”* and that they *“agree with The Victorian Society’s letter of objection dated 12 July.”*
332. *Historic Buildings and Places* state that: *“The cantilevered nature of the tower and the floor plane of level 3 extending out to the finial atop the pavilion’s dome continues to be unacceptable. The local context has changed irreparably, leaving the pavilion somewhat isolated. The nature of the cantilever means the new build elements would now completely dominate the pavilion with the overhang interfering with its unique roofline, further eroding and harming its setting and the way it is viewed.”*
333. Officers disagree with these conclusions. There is consensus that the original setting of the Bath House was very constrained as it was surrounded by and attached to other buildings. Seeing the Bath House as a self-standing element surrounding by open space was never the original design intention. Officers do not consider that the outline of the lantern was meant to be seen in silhouette against the sky, as it was designed to be lower than the existing historic townscape on the site at the time of its construction. This is also illustrated by historic photos (Figures 17-20) included in the Applicant’s Built Heritage Assessment.

334. The proximity of the Bath House to other buildings is a dynamic redolent of its original setting. The increased height of the proposal in relation to the Bath House and its partial cantilevering, while bringing development closer to the listed building, is not considered to be so markedly different to its original setting as to fundamentally undermine the listed building's significance. The partial oversail would not diminish an ability to appreciate the asset in close experiences or in views approaching the asset from the east or west in relation to St Botolph's Churchyard. This design approach was the result of various explorations for the tall building. The proposed option includes an oversail while minimises the need of structural columns in the surrounding public realm.
335. Historic England states that: *"We have also previously identified some harm arising from the proposed treatment of the public realm immediately around the kiosk. The amendments to the scheme related to the latter have moved in the right direction in simplifying the patterned surface treatments, but we think that the proposals would still detract from an appreciation of its significance, primarily because the kiosk would still appear as a somewhat marooned object, rather than being integrated with the street."*
336. As part of SAVE Britain's Heritage objection letter, in relation to the public realm works around the Bath House *"SAVE considers the applicant's reasoning that design details (such as geometric pattering of the lower level's façade and red cladding) would mitigate the impact of this proposed development on the bath house to be insufficient justification to comply with para 200. On the contrary, we consider such details would compete and diminish the primacy and appreciation of the bath house and its setting."*
337. The Landscape Statement refers to the linear public highway that connects StBotolph-without-Bishopsgate with New Broad Street through the public realm of the site as "The Lane". The proposed changes at The Lane, including the area around the Bath House involve the removal of hard landscaping that was created in the late 20th century. They also include the provision of a screening background to the Bath House at the façade of the new 55 Old Broad Street, as well as a patterned surface around the Bath House that incorporates paving lights that feed light into the basement of the Bath House and at night, when occupied, becomes a coloured paving pattern.
338. The provision of a decorative screen in the tall building to provide a background in views of the Bath House is considered an appropriate approach to draw attention and differentiate the Bath House from the neighbouring lobby. The

design of this background screen has evolved and simplified so as to provide some interest without detracting or creating an overly busy background to the asset. In terms of the surface treatment, having a different treatment to indicate the extensive basement space underneath the kiosk is welcome and acceptable. The design of this surface treatment as well as the design of the background screening would be reserved by condition.

339. Officers disagree that the proposed public realm layout would be detrimental to the setting of the Bath House. It would result in an improved, more functional layout around this listed building that would enable better access to and appreciation of it from close quarters, albeit not in a way which specifically enhances significances but rather forms a positive change.
340. Officers further conclude that, on balance, the scheme would preserve the special architectural and historic interest of the listed building and the contribution made by setting. The proposals would lead to benign, positive change in the surroundings of the asset, albeit in a way unlinked to specific enhancement of setting or significance.

## **Designated Heritage Assets – Indirect Impact**

### **Scheduled Monuments**

341. London Wall: remains of Roman and medieval wall from W end of All Hallows Church to 38 Camomile Street (above ground)
342. The London Wall was constructed between 190 and 225 AD and extended from Tower Hill to Blackfriars. It consisted of straight sections, featuring gateways at key entry points such as Aldgate, Bishopsgate, Newgate, and Ludgate. Defensive bastions were incorporated into the Wall during the 3rd century AD. Throughout the medieval era, the Wall underwent various repairs and reconstruction efforts.
343. Today, several portions of the London Wall have survived in various states. Some segments are located below ground, while others remain above the surface. In this designated section of the Wall, there is a small section of the London Wall which lies above ground. This is located to the west of the Church of All Hallows and enclosing part of the northern edge of its Churchyard. The section within the application site is below ground.



### Significance

344. The remaining above-ground elements of the scheduled monument are of archaeological and historic interest as evidence of a defensive structure in Roman times and its apparent influence in shaping the City's urban development through to the medieval period. There is group value with other scheduled parts of the London Wall and Roman remains in the City.

### Setting

345. The original setting of the Wall has changed considerably over the years. The immediate setting of the Wall includes the Church of All Hallows and associated Churchyard which are considered to make a positive contribution to its significance. The wider setting of the Wall includes modern development, including tall buildings to the east and around the application site. The alignment of the SAM to the eponymous street and the relationship between the two is an element of setting which contributes to the significance of the SAM by illustrating its morphology and purpose; otherwise these other, modern elements of setting do not contribute to significance.

### Impact

346. The significance of this asset is derived by its survival and incorporation to the Church of All Hallows and Churchyard. The proposed development would introduce a change to the setting of the Wall, but in the area of setting which does not contribute to its significance. This change would be consistent with other tall development around the site. As such, in baseline and cumulative scenarios, it would not affect the significance of this heritage asset, in terms of its above ground elements.

## Listed Buildings

347. St Paul's Cathedral (Grade I):

### Significance

348. London's and one of the nation's most famous landmarks, St Paul's was London's first cathedral and one of the earliest sites of Christian worship in Britain. It is identified as 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. 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 derives from its architectural, historic, artistic and archaeological interest, 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

349. In terms of setting, for hundreds of years St Paul's Cathedral 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:
- Those wider strategic plan-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. These make a substantial contribution to significance and an appreciation of it.
  - 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.
  - 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.

- 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:

350. The location of the tall building has been carefully considered and has been strategically sited at the edge of the City Cluster and within an area that is not considered inappropriate for tall buildings, consolidating tall buildings and growth in a manner which would be the least impactful on strategic heritage assets, including St Paul's.
351. Historic England, the Surveyor to St Pauls Cathedral, SAVE Britain's Heritage and the Georgian Group have raised concerns on the potential impact of the proposed development on the prominence of the Cathedral, as seen from south-western vantage positions from Waterloo Bridge. Officers also identify a very minor impact on the significance of the Cathedral, through a change in the setting of the Cathedral and also conclude there is a degree of harm from these vantage positions.
352. The proposals' principal impact on the Cathedral's setting would be in Element (I) as identified above. It would not affect Element (II), would benignly affect Element (III) and would be largely neutrally perceived in Element (IV).
353. In respect of those wider riparian views, the proposed development would be seen in conjunction with St. Paul's Cathedral in long-range views from the River Thames, particularly in Views 1, 2, 3, 4, 5, 6, and 7 as presented in the THVIA. Generally, the proposed development, in baseline and cumulative scenarios, is anticipated to generally appear as a modest addition, characterised by notably lower apparent height in comparison to the existing tall buildings within the City Cluster, and with an unremarkable presence in most of these riparian experiences.

354. However, as set out above, the proposal would affect views of the Cathedral from Waterloo Bridge and in particular from the northern end of the Bridge around Assessment Point 15B.1. Here, the proposal would appear very close to the Cathedral, occupying the majority of the silhouette of the existing Nido Spitalfields tower, but infilling a slight increment of clear sky space above Dashwood House adjacent to the drum in this view.
355. The Cathedral's clear sky setting is considered highly sensitive and any incursion into it, especially near or adjoining elements of the silhouette, create the possibility of conflict with this element of setting and therefore harm to the significance of the listed building. While the proposed development would leave the setting of the Cathedral very largely preserved, it would in this slight but important respect harm the setting and therefore the significance of the Cathedral. As such, it is considered that the significance of the Cathedral would experience a slight level of less than substantial harm, in baseline and cumulative scenarios. Considerable importance and weight is attached to this harm.

### **Church of All Hallows London Wall (Grade I)**

#### *Significance*

356. The church was designed by George Dance the Younger, built in 1765-7 to replace a medieval church built up against the City wall. While the church's exterior is generally restrained, it features an ornate west tower that culminates in a circular cupola. The visual prominence of the tower, which is generally of small scale, is accentuating by the use of contrasting Portland stone to the stock brick of the main part of the church. The interior is particularly noteworthy and had a later influence on Dance's pupil, Sir John Soane.
357. The church has historic and architectural interest as an 18th-century church designed by George Dance the Younger. The unconventional aisleless floor plan of the church, its prominent tower made of Portland stone, and the grand arcade on its southern façade contribute to the significance of the Church. The church also holds additional historic and archaeological interest deriving from the foundations and remains of the Roman London Wall that incorporates. The interior is of interest and further contributes to the significance of the church.

358. An above-ground section of the medieval London Wall acts as the western boundary of the churchyard, and this segment is designated as a Scheduled Monument.

### *Setting*

359. The church is located on London Wall, a busy thoroughfare, approximately 50m west of the proposed development. Its setting is defined by its location at the edge of the road, in a densely built urban setting. The location of the church by the foundations of the Roman London Wall upon which it stands makes a significant contribution to its significance. The small Churchyard, to the west of the Church is also an important and positive element of its setting. Tall buildings within the Cluster form part of the setting of the church as they appear as a backdrop to it, mainly in views from the west. These include Dashwood House, just northeast of the development site and 1 Rebel St Mary Axe and Heron Tower (110 Bishopsgate) which form the backdrop in views of the Church from London Wall looking east. These tall buildings, as well as the existing modern development on the application site, do not contribute to the significance of the Church.

### *Impact:*

360. Historic England, SAVE's Britain's Heritage and the Georgian Group have identified harm to this asset, in their consultation responses. These have been summarised and can be found in the Statutory Consultation section above .
361. The proposed development would introduce a taller building in the vicinity of the Church. This additional built form would appear within an extensively altered and dominated by tall developments context that already informs the setting of the Church, including views looking west.
362. In some of these views, including View 12, the proposed development would be lower than existing taller development in the background of the church. In others, including View 13, the proposed development would appear higher than existing development in the background of the church and some clear sky would be infilled above the cupola of the tower. HE states that: "*In both cases, the churches as focal points would be diminished through the loss of clear sky and development which distracts from their pre-eminence. In the case of All*

*Hallows, the proposals would rise much higher than its cupola in the backdrop. Its filigree detailing would also become harder to appreciate against the proposed façade.” The Georgian Group states that “The 24 storeys would present a distracting backdrop to All Hallows which would compete with the church, whilst in kinetic views down London Wall dominate the skyline behind. The height and massing of the tower would therefore cause an element of less than substantial harm to the significance of All Hallows.”*

363. Given the much-altered context of the Church and the presence of tall buildings in and around the site that already affect views of the church and its tower, it is not considered that the proposed development would affect the prominence of the church or diminish any further from the existing context the church’s ability to act as a focal point along London Wall.
364. Officers do not consider the existing sky that would be infilled to contribute to the significance of the church or the prominence of its tower as the tower is currently seen against existing tall development. Due to the architecture and materiality of the proposed tall building, Officers are of the view that the western façade of the development would provide a much more coherent and regularised background to the church tower and its filigree detailing, making it easier to appreciate when comparing it to the existing situation where the backdrop is formed by developments of different style and materiality.
365. The development would be seen as an addition to the existing and emerging tall building context along Bishopsgate and Wormwood Street which make a neutral contribution to this asset. As such this change is not considered to be harmful. Whilst the proposed development would be prominent in some views of the church, it would be consistent with existing tall development within the setting of the church, which is characteristic of this part of the City and is not a new element or disruptive feature out of context. In terms of its height and scale but also its architecture and materiality, Officers consider that it would not detract further from the Church of All Hallows and its prominence.
366. The proposed development will introduce a change to the setting of the Church of All Hallows, as it would appear as a backdrop in views of the church from the west. Officers do not consider that the proposal would adversely affect any elements of the setting that make a positive contribution to the church. The proposed development, in baseline and cumulative scenarios, would not affect the ability to understand or appreciate the Church and would preserve its significance and the contribution of setting.

## **Church of St Botolph Bishopsgate (Grade II\*)**

367. Built between 1725 and 1729, this church was initially designed by James Gould and later modified under the supervision of George Dance. The east and main façade is crafted from Portland stone and showcases an arched window framed by paired Doric pilasters that support a pediment. Notably, this church diverges from the typical layout of other City churches, with the tower located at the east end, and the chancel situated beneath it. The tower rises in three stages, embellished with pilasters, a clock, and crowned with four urns encircling a circular lantern within a balustrade. At the top, there's an ogee dome and a carved finial. The remaining elevations are constructed from red brick and Portland stone, with modifications made in the 19th century. The interior of the church is also of interest.

### *Significance*

368. The church has historic interest as an early Georgian church with 19<sup>th</sup> century alterations that illustrates the development of the area at the time. Architectural and artistic interest derives from the appreciation of its Neo-classical style, featuring an unusually placed tower at the east end. The interior of the church also contributes to its significance. The church is part of four medieval churches dedicated to Saint Botolph, each situated by one of the city's gates. Today, only three of these churches remain, including this church, St Botolph's Aldgate, and St Botolph's Aldersgate. Their collective significance is enhanced by their proximity and association with essential medieval defence features (gates) within the City.
369. The church of St Botolph (Grade II\*), two drinking fountains, three overthrows and lanterns, the Bishopsgate Parish Memorial (Grade II) and St Botolph's church hall (all Grade II), all have group value and form a distinct group of buildings and structures.

### *Setting*

370. The church is positioned approximately 55 meters to the east of the development site. Its setting is defined by its location along Bishopsgate, just north of the remains of the medieval London Wall and one of the City gates. The setting of the Church encompasses its churchyard, to the east of the church, initially established in the 15th century, expanded to its current size in



1760 and was transformed into a garden in 1863. While the setting of the church has undergone substantial changes over the years, the enduring presence of a churchyard, regardless of its various forms, forms a positive element of the setting of the Church which consistently enhances the church's significance. The Church Hall and listed structures within the churchyard also make a positive contribution to it. The church's setting extends to include numerous large-scale developments that surround it, varying in size, age, and appearance. These include Dashwood House, the existing buildings on the development site, and the distinctive elliptical tower-like structure at The Crosspoint (34-37 Liverpool Street) immediately to the north. This element of the setting does not contribute to the significance of the church. The remaining 19th century facades of the buildings to the north of the Church make some positive contribution to its significance.

### Impact

371. Historic England, SAVE's Britain's Heritage and the Georgian Groups have identified harm to this asset, in their consultation responses. These have been summarised and can be found in the Statutory Consultation section above .
372. HE states that *the proposals would detract from the already compromised settings of the church of St Botolph and All Hallows, presenting a larger and more dominant building in comparison to their existing backdrops. In both cases, the churches as focal points would be diminished through the loss of clear sky and development which distracts from their pre-eminence.....Whilst the setting of these heritage assets is already characterised by the dramatic contrasts with existing modern development, many of these relationships are negative, and the proposals would contribute to a further weakening of the ability to appreciate their significance.*
373. The Georgian Group states that *"View 22 within the submitted THVIA presents the impact of the 24-storey tower when looking west from the One Bishopsgate Plaza. Within this view, the tower of St Botolph's Church holds the viewers eye and the clear skyline, despite the presence of 99 Bishopsgate, contributes to the setting and significance of the church whilst enhancing the City skyline. The introduction of the 24-storey tower would compete with the tower visually removing the ability to appreciate the church within the City skyline and would cause less than substantial harm to the significance of St Botolph's Church."*

374. The proposed development would replace the existing Broad Street House with a building of larger scale, as such it would be more visible in views towards the Church than the existing building. Despite its increase in scale, the proposed would align with the existing character of the setting of the Church of St. Botolph's. It would appear as a modern tall building, distinct from and separate from the church. Existing tall development, including 99 Bishopsgate, Dashwood House, the existing buildings on the development site, and the distinctive elliptical tower-like structure at The Crosspoint (34-37 Liverpool Street) form part of the backdrop of the Church, as can be seen in Views 21 – to 23 in the THVIA. Within such a much-altered setting, informed by the presence of numerous tall buildings, the proposed development would not detract any further from the Church, its prominence and appreciation within the City skyline, including from Bishopsgate Plaza (View 22).
375. Regarding the assessment of daylight, sunlight, and wind effects on the church (Chapter 10 of Environmental Statement (ES) Volume 1) it is found that while there may be significant adverse effects in specific areas of the church premises, these are deemed acceptable for a church situated in an urban environment and would not affect the understanding and appreciation of the Church
376. As a result, the proposals, in baseline and cumulative scenarios, would preserve the setting and the significance of the Church of St. Botolph and an understanding and appreciation of it.

### **St Botolph's Church Hall (Grade II)**

#### Significance

377. The Hall associated to St Botolph's Church dates from 1861. It is a single storey building with a pitched roof, of Classical style, constructed of red brick and Portland stone, reflecting the style and materials of the church. The Church Hall has historic interest as a 19<sup>th</sup> century structure, originally built as an infant's school and later converted to a church hall and architectural interest deriving from the appreciation of its style and materials, complementing the style and materials of the main church.
378. The church of St Botolph (Grade II\*), two drinking fountains, three overthrows and lanterns, the Bishopsgate Parish Memorial (Grade II) and St Botolph's

church hall (all Grade II), all have group value and form a distinct group of buildings and structures from early Georgian to the early 20th century.

### Setting

379. The setting of the Hall is defined by the churchyard within it stands and its relationship with the Church, being closely associated with it. The Church, the churchyard and associated structures are the only elements of its setting that contribute to its significance.
380. Being in a built-up urban context that has changed dramatically over the years, the contributing setting of the Hall is not considered to extend beyond the churchyard, and the wider modern setting of the Hall makes only a neutral contribution to significance.

### Impact

381. The proposed development would replace the existing building at 55 Old Broad Street with a taller building of bigger scale. Given the extent of the surrounding tall development, the proposed tall building would be consistent with the character of the area surrounding the Church Hall which includes many tall buildings, including Dashwood House, directly to the west of the Church Hall. The proposed development would not affect the relationship of the Hall with the Church, the churchyard or any of the other listed structures that form positive elements of its setting.
382. Chapter 10 of Environmental Statement (ES) Volume 1 discusses the impact of the proposed development on aspects such as daylight, sunlight, and overshadowing, particularly in relation to the Church Hall. The assessment indicates that there are no significant effects on daylight, while a major adverse effect on sunlight is acknowledged. However, the level of sunlight is deemed acceptable for this urban area and would not affect the use of the building as a Church Hall.
383. This means that while the proposed development might have a notable impact on the amount of sunlight received by the Church Hall, its significance and understanding and appreciation would not be affected.

384. The proposals, in baseline and cumulative scenarios, would preserve the setting and the significance of the Church Hall and an understanding and appreciation of it.

**Two drinking fountains, three overthrows and lanterns; and Bishopsgate Parish Memorial (both Grade II)**

Significance

385. The drinking fountains include two stone piers on either side of the entrance to the churchyard of St Botolph's from Bishopsgate. They are of stone with pink granite bands with brass fittings. The overthrow and lanterns date from the late 19<sup>th</sup> century and comprise wrought iron barbed overthrows and railings embracing Windsor lanterns. They have historic and architectural interest as 19<sup>th</sup> century decorative structures within St Botolph's churchyard.
386. The Memorial dates to 1916 and was built to commemorate both named war heroes and un-named local servicemen who had died in the first two years of the conflict.
387. It has historic interest as it serves as a poignant reminder of the profound impact of global events on the local community and stands as a testament to the sacrifices made by the community during World War. Architectural interest derives from its elegant design, featuring a memorial cross designed in a medieval style.

Setting and impact

388. The church of St Botolph (Grade II\*), two drinking fountains, three overthrows and lanterns, the Bishopsgate Parish Memorial (Grade II) and St Botolph's church hall (all Grade II), all have group value and form a distinct group of buildings and structures. This group setting for these two listed elements of street furniture makes a contribution to their significance; the wider urban setting makes a neutral contribution. The proposals would amount to change in this wider, neutral setting and would not affect elements of setting which contribute to significance. . Accordingly, the proposals would preserve the significance of these two listed structures,

## Great Eastern Hotel (grade II\*)

389. Hotel of 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.

### *Significance*

390. 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*

391. The immediate, local setting of the listed building makes a positive contribution to its significance, despite recent and late 20<sup>th</sup> 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 shows 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. The wider area surrounding the Great Eastern Hotel is characterised by modern development and tall buildings such as One Bishopsgate Plaza and 110 Bishopsgate to the southeast, and 99 Bishopsgate, Dashwood House, and Tower 42 to the south and southwest. This wider setting is considered to make a neutral contribution to significance.

### Impact

392. Historic England and the Victorian Society have identified harm to this asset, in their consultation responses. These have been summarised and can be found in the Statutory Consultation section above .
393. Victorian Society states that: *“In particular, the massing of the proposal would actively compete with the careful outline of the Flemish Renaissance-style Grade II\* listed former Great Eastern hotel, as viewed from the Bishopsgate Conservation area.”*
394. Historic England states that: *“The proposals would appear behind the roof of the Great Eastern Hotel as viewed from Bishopsgate. The proposals would further detract from the hotel’s prominence in the townscape, causing some harm.”*
395. Most of the short-range views, as shown in View 7, that best appreciate the listed building's significance, particularly its relationship to Liverpool Street Station, would not feature the proposed development due to their direction compared to the site's location.
396. However, the proposed development would be visible in some views when looking south along Bishopsgate that include the Great Eastern Hotel. In some cases, it may appear behind the listed building. Existing tall buildings, like 99 Bishopsgate and Tower 42, are often present in such more distant views, including directly behind the listed building, as demonstrated in View 20. In the cumulative scenario, the RTG 55 Bishopsgate would appear behind and to the left of Tower 42, intensifying the tall building background to this view but without altering the way this asset is seen in the context of the proposed development.
397. When visible behind or in the context of the listed building, the proposed development, in all scenarios, aligns with the scale and type of development already present within its the local and wider setting, which is defined by its urban location. As it would clearly appear as an element in the background, the Hotel would continue to be experience and appreciated along Bishopsgate.
398. Although there would be a change in the setting of the building, this would not affect the positive elements of that setting, including its relationships with Liverpool Street Station and prominence along Bishopsgate. The proposals, in

baseline and cumulative scenarios, would preserve the significance of the building and the contribution of setting.

399. 13 Bishopsgate (Grade I)

Significance

400. The building has historic interest as a distinguishes and ornate 19<sup>th</sup> century building commissioned as the headquarters of the National Provincial Bank and from its association with J Gibson who designed it. Architectural interest derives from its rich Classical style and Portland stone facade.

Setting

401. The listed building forms part of an almost continuous street frontage to the western part of Bishopsgate that includes historic buildings of mostly similar age, scale and style that inform its setting and make a very positive contribution to it. These include the Lloyds Bank and British Linen Bank with which it shares an associative connection with the development of the area for banking, as well as a coherent appearance. The immediate setting of the building also includes modern tall buildings, most notably 22 Bishopsgate opposite of the listed building to the east. Additional modern tall development is also present in views of the listed building looking north, including Tower 42 and 99 Bishopsgate which rise prominently in the background of such views. These modern tall development do not contribute to the significance of the listed building.

*Impact*

402. In the baseline scenario, the proposed development would appear partially between Tower 42 and 99 Bishopsgate in views of the listed building to the north. The proposed development would rise on top of existing modern development to the north of the building. The proposed development would be consistent with the character of the background development in views of the building to the north having a neutral impact on the significance of the asset. In the cumulative scenario which includes the RTG 55 Bishopsgate, the latter would rise at a considerable height just to the right of Tower 42 in views to the north, obscuring further the visibility of the proposed development. As such only a very small part of the proposed development would be visible among existing modern developments, consistent with the character of the development in the background of the building.



403. In both scenarios, the relationship of the listed building and historic buildings to the west would be unaffected by the proposed development.
404. The proposed development would preserve the significance of the listed building

### **St. Benet Paul's Wharf (Grade I)**

405. The Church of St Benet, Paul's Wharf was built between 1677 and 1685 and is one of the least altered of Wren's churches. It features a square layout with a prominent western tower and a three-bay northern aisle. The red brick façades are adorned with painted stone accents. The tower boasts a wooden cornice crowned by a lead-covered cupola. This cupola includes a lantern and a distinctive weathervane.

#### Significance

406. The significance of the listed church stems from its high architectural and historic interest as a 17th century church designed by Sir Christopher Wren. Being one of the few surviving churches rebuilt after the Great Fire combined with the level of intactness of the church, further contributes to its significance.

#### Setting

407. The church is predominantly surrounded by modern development that does not contribute its significance. Such modern development includes the City of London (CoL) School buildings to its east and south, constructed in 1986. However, the use of red brick in the school buildings reflects the materials of the church. One notable exception is the Grade I listed College of Arms to the north, which was built around the same time as the church and does contribute to its significance. The church's setting has been also affected by modern road infrastructure, specifically Queen Victoria Street to the north and White Lion Hill to the west, which are situated at a higher level than the ground of the church, diminishing its presence to some extent.

#### Impact

408. St. Benet, Paul's Wharf is situated approximately 180 meters south of St. Paul's Cathedral. Given that both were designed by Wren, built during a similar timeframe, and located relatively close to each other, they can be considered to form part of each other's local setting, despite being separated by modern developments. There is some visibility between the two landmarks from various vantage points, particularly along White Lion Hill. The tops of the Church tower and St. Paul's Cathedral are occasionally visible together in long-range views along the River Thames, sometimes accompanied by other Wren-designed churches in the City. In some of these views, tall developments within the City are discernible in the distance in certain views, including the Church when looking east, and when viewing the top of its tower along the River Thames. There is no visibility between the site, situated approximately 1.2 km to the north-east, and the area around the Church.
409. The proposed development, in all scenarios, would be visible in views of the Church tower from the River Thames, including Views 1, 2, 4, 5, and 6 of the THVIA. In these the Church tower is seen within the context of tall modern development in and around the City Cluster. In the majority of these views, the Church tower is perceptibly shorter than other church towers in the skyline. The proposed development would typically constitute a relatively modest addition to these views, and it would not usually share a direct spatial relationship with the Church, however in View 6, the proposed development would appear behind the Church tower. This particular view includes Angel Court to the left of the Church tower. In this scenario, the proposed development would be situated behind Angel Court and the Church tower, presenting itself at a lower apparent height compared to Angel Court. Even though it would appear directly behind the tower, it is not anticipated that this positioning would diminish the significance of the church. This is particularly relevant in this constrained view of the church tower, which is already influenced by the presence of tall modern development. The proposed development would become a part of this altered context and would not have a negative impact on the ability to understand and experience the church in close, medium or long range views. Therefore, the significance and contribution of setting of the church would be preserved, in both baseline and cumulative scenarios

### **St. Mary-le- Bow Cheapside (Grade I)**

410. The church was constructed between 1670 and 1683 under the design of Christopher Wren. It features a 12<sup>th</sup> century crypt with the primary square structure of the church clad in red brick and complemented by Portland stone trimmings. Its eastern and western facades display pedimented or gabled

sections with a substantial central arched window, flanked by narrower windows accompanied by circular openings above. A simple connecting structure links the church to a tower situated fronting Cheapside. The tower is constructed of Portland Stone and features an open ground floor with entrances on the northern and western sides. The belfry is embellished with pilasters and supports a balustrade adorned with scrolled finials at the corners, culminating in a steeple featuring two tiers of columns.

### Significance

411. St. Mary-le-Bow has historic and architectural interest as a 17th-century City church, masterfully designed by Christopher Wren. It is renowned as one of Wren's most extensive and impressive creations. The church boasts an elegant tower, adorned with an elaborate steeple, which serves as a distinctive and prominent feature in both close-up and distant vistas, with its impact notably pronounced along Cheapside. Archaeological interest survives from the survival of the 12<sup>th</sup> century crypt.

### Setting

412. The immediate and local surroundings of the Church are characterised by medium and large-scale modern structures, notably Bow Bells House to the immediate west. The heights of these contemporary developments do not overshadow the Church's tower, allowing it to maintain its historical prominence in east-west vistas along Cheapside. This prominence is accentuated by the tower's slight projection forward compared to the prevailing building line. The Church is also appreciated at close range within the mostly enclosed setting of the former churchyard to the west of the Church. This former churchyard is expanded in size. Bow Lane, running along the eastern boundary of the Church, is a narrow thoroughfare following the medieval street layout dating back to the Church's construction.
413. St. Mary-le-Bow is located approximately 250 meters east of St. Paul's Cathedral. Due to their shared architect, Christopher Wren, their construction during a similar period, and their relative proximity, they mutually enhance and contribute positively to each other's local settings and architectural and historical significances. Both assets can be observed from various viewpoints, notably at the junction of Cheapside and New Change. The top of the Church tower is occasionally seen in conjunction with St. Paul's Cathedral in long-range

views along the River Thames, and sometimes includes other Wren-designed City churches.

414. While tall modern developments in the City can be seen in conjunction with the Church, including views facing east from the Church, and those featuring the top of the Church tower along the River Thames, there is no intervisibility between the Church and the development site, which is located about 750 meters to the northeast of the Church. These elements of setting do not contribute to the significance of the Church.

#### Impact

415. In views from the River Thames, in baseline and cumulative scenarios, encompassing both the Church tower and the proposed development (such as Views 1, 2, 4, and 5 in the THVIA), it is evident that the Church tower is set against the backdrop of larger modern developments within the City Cluster. Furthermore, modern buildings often stand directly behind the Church tower. In two of these views, Views 1 and 2, the proposed development would appear behind the church tower.
416. Specifically in View 1 (LVMF 17B.1), Angel Court dominates the skyline, surpassing the height of the Church tower. In this view, only a very small part of the proposed development would appear behind Angel Court and the Church tower, positioned at a lower apparent height relative to Angel Court. In View 2 (LVMF 17B.2), Dashwood House is seen behind the Church tower, positioned at a lower level than the upper steeple of the Church. The proposed development would occupy a similar position, without an apparent height exceeding that of Dashwood House.
417. The proposed development is not expected to affect the local setting of the Church. In terms of its wider setting, as perceived in views along the River Thames, the proposed development would seamlessly integrate into the existing character of these views. Where visible behind the church, the proposed development would be of very limited visibility and in the context of existing tall modern developments like Angel Court and Dashwood House in a similar position.
418. The character of these views and the prominence of the church within them would not be affected. As a result, the development, in baseline and cumulative

scenarios, would not affect the understanding and appreciation of the church, preserving its significance and contribution of setting.

### **St. Nicholas Cole Abbey**

419. St Nicholas Cole Abbey was constructed between 1671 and 1681, by Sir Christopher Wren. The church is mainly constructed of Portland stone, featuring arched and corniced windows, an entablature, and a prominent balustrade. The western elevation of the church presents an irregular appearance, with elements of exposed rubble and brickwork adding character. The main entrance is adorned with a pedimented doorway situated towards the western end of the south side and another in the north face of the tower. The tower showcases arched openings with a pedimented cornice, capped by four ornate urns. Crowned with a lead-covered spire replete with small oval and circular windows, a gallery, and a weather vane, it adds to the church's distinctive silhouette. The interior of the church suffered extensive damage during World War II but has been meticulously reconstructed to closely resemble its original form.

#### Significance

420. Architectural and historic interest as a 17<sup>th</sup> century City church by Wren, built on the site of a former church destroyed in the Great Fire, with an unusual plan form. The tower is an elegant skyline feature that contributes to its prominence and townscape value. The church retains its original pulpit, font cover, altar rails, and an iron sword rest that contribute to its significance.

#### Setting

421. The Church's immediate setting is characterised by modern development including medium and large-scale modern buildings. These structures include Bracken House to the east, 128 Queen Victoria Street to the west, and 4 Cannon Street to the north. While the spire of the church rises above most of the surrounding development, the Church itself does not stand out prominently beyond its immediate vicinity. This is due to its location set back from the street and its relatively modest height.

422. St. Nicholas Cole Abbey is located approximately 150 meters to the southeast of St. Paul's Cathedral. Given that both were designed by Sir Christopher Wren, constructed at similar times, and situated in relatively close proximity, they can be regarded as integral elements of each other's local context, contributing positively to one another's settings. Although they are separated by modern developments, there is some visual connection between the two buildings. In certain long-range views along the River Thames, both the top of the Church tower and St. Paul's Cathedral are visible together. This visual connection also extends to include other Wren-designed churches in the City.

## Impact

423. While tall modern buildings within the City can be seen in the distance from some viewpoints, including those looking east from the Church and those capturing the top of the tower along the River Thames, there is no direct visual connection with the site. The site is situated approximately 1 km to the north-east and is not visible from the area surrounding the Church.
424. The proposed development would be visible in views from the River Thames including the Church tower, including Views 1, 2, 3, 4, 5, 6 and 7 in the THVIA. In these views, in baseline and cumulative scenarios, the Church tower is often seen with modern buildings directly behind it with the proposed development usually being a relatively minor addition to these scenes when viewed alongside the Church tower.
425. In most of these views, the development would not generally have a direct relationship with the church. However, in View 7, the proposed development would appear behind the Church tower. In this view, Angel Court is already visible behind the Church tower. Due to the relative lower height of the church tower in this view, which is not a designated view, and the much-altered context within which it stands, the church tower is not prominent in this view. The proposed development would appear behind both Angel Court and the Church tower, and it would be at a notably lower apparent height than Angel Court. Given this context, the proposed development would not dominate the view, and would form part of established surrounding modern development. As such, it is not considered that the ability to appreciate and understand the church would be affected.

426. The proposed development would not affect the local setting of the Church. When considering its wider setting, particularly when viewed along the River Thames, the proposed development would seamlessly blend into the existing character of such views. The proposed development would not have a negative effect on any elements of the setting that make a positive contribution to the church. The significance of the church would be preserved in baseline and cumulative scenarios.

### **New Broad Street Conservation Area**

427. 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.

#### Significance:

428. The significance of the Conservation Area lies 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 from the Church of All Hallows (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:

429. 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.
430. 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. These make a neutral contribution to the significance of the conservation area.



## Impact

431. The Victorian Society and SAVE's Britain Heritage have mentioned that the proposed development would negatively affect views related to New Broad Street Conservation Area in their responses. Officers disagree with them for the reasons below.
432. The proposed development site is located just east of the New Broad Street Conservation Area. As such, the proposed development would be visible from it, in views from within the Conservation Area, looking east, as well as views of the Conservation Area. Examples of views from within the Conservation Area include Views 18 and 19 included in the THVIA.
433. Tall buildings, including Dashwood House, 110 Bishopsgate, and 100 Bishopsgate, constitute a backdrop of tall structures behind the buildings within the Conservation Area. Due to their distance, contrasting style and materiality, these tall buildings appear clearly distinct from the buildings within the conservation area. The existing building at 55 Old Broad Street is also evident in these views, however, at a lower level than the tall buildings mentioned.
434. The proposed tall building at 55 Old Broad Street would come into view in the foreground of views to the east, positioned in front of 100 Bishopsgate and a section of 110 Bishopsgate. Similarly with the existing tall buildings around the site, the scale, form, and overall appearance of the proposed tall building at 55 Old Broad Street would align with the existing character of the Conservation Area's eastern setting, encompassing the current building at 55, Dashwood House adjacent to it, as well as 110 Bishopsgate and 100 Bishopsgate in the background. This cohesive integration will be particularly evident in views from the Conservation Area looking east, where prominent tall buildings like Dashwood House, 110 Bishopsgate, and 99 Bishopsgate already define the surrounding context, creating a distinctive and separate backdrop against which the Conservation Area is foregrounded. As such, the significance of the conservation area would not be negatively affected.
435. Additionally, the lower-level volume of the existing building at 65 Old Broad Street would be partially demolished, thereby creating an open access point that aligns with New Broad Street. This alteration would enhance the visual and physical permeability between the site and its surroundings, allowing for enhanced views at street level. These enhanced views would allow the

proposed to be refurbished Victorian Bathhouse to be seen and appreciated from within the New Broad Street Conservation Area. This would provide a visual connection and continuation of the Victorian buildings within the Conservation Area and the Bathhouse within the site.

436. The relationship of the Conservation Area to the neighbouring Finsbury Circus Conservation Area in the west, that has been identified as positive element of its setting would remain unaffected by the proposals.
437. Overall, it is considered that, in all scenarios, the proposed development would not have a negative impact on the character and appearance or significance of the conservation area. There would be positive change within the setting of the conservation area through the realignment of the building at 65 Old Broad Street, the improved permeability and new views of the Bathhouse. This would be positive change rather than specific enhancement of the setting and therefore the character, appearance and significance of the conservation area.

### **Bishopsgate Conservation Area**

438. 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 and east of the development site.
439. Bishopsgate was originally a Roman route travelling north out of the City. The Conservation Area extends from Wormwood Street on its southern boundary, to Brushfield Street to the north.

### **Significance**

440. The conservation area has historic interest and architectural interest that derives from 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

441. 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 that are considered to make a neutral contribution to its significance. The development site is adjacent to the conservation area, to the south and east.

#### Impact:

442. The Victorian Society and SAVE's Britain Heritage have mentioned that the proposed development would negatively affect views related to Bishopsgate Conservation Area in their responses. Officers disagree with them for the reasons below.
443. 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.
444. The proposed development would be visible from areas within the Conservation Area. It would also be visible in views of the Conservation Area. Such views include 14 and 17 and Views 20 – 25 within the THVIA.
445. The proposed tall building would replace an existing building on the site that represents a visual contrast with the smaller-scale buildings within the Conservation Area, especially those on Wormwood Street and Old Broad Street.

446. When the proposed development is seen in close views, for example along Worwood Street, it has been designed at the lower levels (base) to respond to its immediate context including the adjacent buildings within the Conservation Area. The design and material treatment of the lower levels is considered to respond well to the protected townscape of the Bishopsgate Conservation Area.
447. In longer views of the proposed building, from within or of the Conservation Area, the proposed tall building would appear in the background, in a way consistent to other existing tall buildings like Dashwood House and 99 Bishopsgate. While the development would represent an increase in scale compared to the existing building on the site, and it would introduce a heightened level of contrast between the site and the smaller-scale buildings within the Conservation Area, this intensification would build upon an established background of tall buildings as part of the setting of the Conservation Area. Importantly, the proposed development would exhibit better visual and architectural quality compared to the existing building at 55 Old Broad Street.
448. The proposed development, in baseline and cumulative scenarios, would not affect the significance of the Bishopsgate Conservation Area and would preserve its character and appearance.

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

#### Significance

449. 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

450. 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.

### Impact

451. The proposed development would be visible from the northern and western parts of Finsbury Circus, and from the surrounding streets and pavements, as also illustrated in View 10 in the THVIA which shows that the proposed development would be partly seen, but mostly screened by trees that even in the winter would provide considerable screening.
452. When visible, the proposed development would be seen in the context of several existing tall buildings, including 110 Bishopsgate and 100 Bishopsgate in the same direction as the Site, and 22 Bishopsgate and Tower 42 to the south. The proposed development would appear considerably lower than these buildings and in keeping with the local and broader context of Finsbury Circus.
453. As such, the proposed development, in baseline and cumulative scenarios, would not affect the setting or contribution made by significance of the Registered Park and Garden, or the setting, character, appearance and significance of the conservation area.

## St Paul's Cathedral Conservation Area

### Significance

454. An area of international significance, a focal point of the City of London, part of a major processional route and a focus of national celebration. The conservation area mainly defines the immediate setting of the Cathedral, a building of international historic, architectural and cultural significance and one of England's most important classical buildings and a seminal building in the history of English architecture. An area of great architectural significance, including one of the largest concentrations in the City of London of Grade I, Grade II\* and Grade II listed buildings, as well as numerous non-designated buildings of high architectural quality from different periods. An area where the urban grain varies from tightly knit historic streets and alleys to open spaces around St Paul's Cathedral and churchyard. It is associated with nationally significant religious, cultural and historic events and notable people, including the burial places of numerous historic figures.

### Setting

455. The setting of the conservation area is defined by its location at the heart of London, and in the eastern part of the City. Modern structures, including One New Change, are an integral part of the immediate and nearby surroundings of the Conservation Area, while tall buildings from the post-war or modern era already constitute a component of the broader setting of the Conservation Area. The tall buildings of the central City Cluster are visible in the middle distance in views along St. Paul's Churchyard/ Cannon Street, looking east out of the Conservation Area. These elements make a neutral contribution to the significance of the conservation area. Longer range views towards the Conservation Area, such as those of the River Thames, are principally of the Cathedral itself, the wider setting of which extends beyond the boundaries of the Conservation Area. While the Cathedral is seen in the context of the City Cluster in many such views, the Conservation Area as a whole cannot be appreciated in them.

### Impact

456. The proposed development is not expected to be seen in views from the Conservation Area, however, it would be seen in conjunction with St. Paul's

Cathedral in longer range views from the River Thames such as Views 1, 2, 3, 4, 5, 6 and 7 in the THVIA. The impact of the proposed development on the Cathedral is being discussed in the relevant section. prominence and dominance of the Cathedral extends beyond the boundaries of the Conservation Area. While visible in some longer range views in relation to St Paul's Cathedral, it is not considered that the proposed development would affect the significance of the St Paul's Conservation Area, including the ability to understand and appreciate this Conservation Area. The character and appearance of the Conservation Area would be preserved in baseline and cumulative scenarios.

457. 56-60 New Broad Street (Grade II)

Significance

458. This is an early 20th-century office building, in red brick and stone with a mansion block appearance, modified on the ground floor by C.F.A. Voysey. The building has historic interest as a striking commercial building of the early 20<sup>th</sup> century and from its association with Voysey, a leading architect and designer in the Arts and Crafts movement. Architectural interest derives from its symmetrical and imposing exterior but also from its internal decoration on the ground floor that retains most of the internal fittings however, the context and positions of which has changed.

Setting

459. The building is located on New Broad Street, a street is predominantly flanked by medium scale commercial buildings, creating a harmonious immediate setting that makes a positive contribution to the significance of this asset, including separately listed No. 62 New Broad Street. The street itself is narrow and runs straight, oriented from east to west, with a notable sense of enclosure. The buildings within the New Broad Street Conservation Area make a positive contribution to the significance of this asset. In the wider setting of this asset and as can be seen in views looking east along New Broad Street that include this heritage asset and the application site, the background of this view prominently features tall buildings such as Dashwood House and 110 Bishopsgate (Heron Tower). These buildings and sites make a neutral contribution to the significance of this asset.

Impact



460. The proposed development would replace the existing Broad Street House with a larger scale building while it would introduce an opening in the street frontage along Old Broad Street which would align with New Broad Street, opening up views across the site and creating a more permeable urban environment. The proposed development would be visible, in views looking along New Broad Street, that include the main elevation of this asset, as illustrated by Views 18 and 19 in the THVIA. Although larger in size than the current Broad Street House, it would align with the established character of the existing taller buildings to the east, including Dashwood House, 110 Bishopsgate, and 100 Bishopsgate further in the distance. In such views the listed building would still be prominent in the foreground, allowing for appreciation of its impressive scale and architectural style, as well as its relationship with New Broad Street and neighbouring structures of similar age and style. The proposed development would not compromise the appreciation of the listed building and their immediate surroundings but would instead join an existing group of tall buildings that are distinct from the heritage asset and its immediate context in such views. The proposed development, in baseline and cumulative scenarios, would harmonise with the eastern part of the settings of these listed buildings and would not have any impact on the heritage significance of no. 56-60 New Broad Street or the appreciation of that significance.

461. 62 New Broad Street (Grade II)

462. Formerly part of premises numbered Nos 56 to 60, the building visually belongs to the composition of the adjoining premises to the west. Similarly, it has historic interest as an early 20<sup>th</sup> century commercial building and architectural interest from the appreciation of its style and materials, including notable interior fittings.

#### Setting

463. The listing building at no. 62 shares the same setting at nos. 56 to 60 new Broad Street. The buildings within the New Broad Street Conservation Area make a positive contribution to the significance of this asset while taller development in its wider setting makes a neutral contribution to it.

#### Impact

464. The proposed development would introduce the same change as to the wider setting of 56 to 60 New Broad Street. The proposed development, in all scenarios, would harmonise with the eastern part of the settings of these listed

buildings and would not have any impact on the heritage significance of no. 62 New Broad Street or the appreciation of that significance.

465. 76-80 Old Broad Street (Grade II)

Significance

466. The building has historic interest as a mid-19<sup>th</sup> century building in the Italianate style. Architectural interest derives from the appreciation of its style and materials, including a prominent and ornate stone elevation facing onto Old Broad Street, and plain yellow brick side elevations. The symmetrical design of the main façade contributes to the architectural interest of the building. At the ground floor the building incorporates shops, indicative of the economic and social history of the area. Artistic interest derives from the elaborate detailing, including lion masks at the valleys between the pediments.

Setting:

467. The setting of the building is defined by its location, forming part of a row of buildings on the western side of Old Broad Street, which includes other structures of similar size and a broadly similar age and style. These collectively contribute positively to the immediate setting of the asset. The building is located within the Bishopsgate Conservation Area and just north of the boundary of the New Broad Street Conservation Area providing a historic context to the asset and contributing to its significance. Its local surroundings encompass Dashwood House and the existing buildings on the application site, situated to the southeast on the opposite side of Old Broad Street, although these are clearly different than the surrounding historic development within New Broad Street and Bishopsgate Conservation Areas. Within the wider setting of the asset there are modern tall buildings, with notable examples being Tower 42 and 110 Bishopsgate (Heron Tower). These modern elements of setting do not contribute to the significance of this asset.

Impact

468. The proposed development would be visible in contextual views of the listed building to the north and south along Old Broad Street. These views encompass both the existing buildings on the site and Tower 42 further away.

469. The proposed development would not affect the relationship of the listed building with other structures that share a similar age and look on the western side of Old Broad Street, which have identified to make a positive contribution to its significance.

470. Even though the proposed development would introduce a larger structure in close proximity to 76-80 Old Broad Street, it would maintain a comparable form and size to other tall buildings in the vicinity of the listed structure. Consequently, the proposed development, in baseline and cumulative scenarios, would not affect the heritage significance of the listed building, or the understanding and appreciation of that significance.

471. Liverpool Street Station (Grade II)

Significance:

472. 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:

473. 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

474. The proposed development would be visible from around the station, to its north, from Exchange Square (View A32 in the THVIA), west, from Sun Street Passage (View 9) and south, from Liverpool Street (View 17). It would also be visible in views looking south along Bishopsgate that include Liverpool Street Station (View 20).
475. In all these views, the proposed development would be seen in the context of other tall buildings, currently visible in the background of views of the station, including Tower 42, 99 Bishopsgate and Dashwood House. In View 20, in the cumulative scenario that includes the RTG 55 Bishopsgate, a considerably taller building would appear behind and to the left of Tower 42. This would intensify the taller development in the background of this asset, however it would not affect how the proposed development is seen in relation to this asset. As such the proposed, in both scenarios, development would not be perceived as an isolated tall building, but as part of an established group of tall buildings that already define the setting of the station. The relationship of the station and the former Great Eastern Hotel would not be affected. The proposed development, in baseline and cumulative scenarios, would not have an impact on the significance of this heritage asset, including the ability to understand and appreciate the asset.
476. London Wall Buildings (Grade II)

### Significance

477. Office block, constructed in 1901 and designed by Gordon and Gunton, features a striking stone exterior, and mansard roofs with slate cladding on the end pavilions.

478. Located in the southeast quadrant of Finsbury Circus, this grand Edwardian building holds historic as a representative example of office development in the area surrounding Finsbury Circus while architectural interest derives from the appreciation of its Baroque style and materials and its prominent location in an impressive formal planned development in the City.
479. London Wall Buildings has group value with the other buildings that form part of the Finsbury Circus arrangement as well as with Carpenters' Hall to the south.

### Setting

480. The setting of this asset is informed by its location at Finsbury Circus, with all buildings, structures and landscaping associated with the planned arrangement making a positive contribution to its setting. The Carpenters' Hall to the south also makes a positive contribution to the setting of this asset, as they are of a similar age and style. Modern development is present in its immediate context, generally of similar scale. To the east and south-east, the wider setting of the asset includes tall buildings within the Eastern Cluster, including 110 Bishopsgate, 99 Bishopsgate and 22 Bishopsgate. Dashwood House, directly north of the application site is also visible in some views of the listed building. These modern elements of its setting, including the application site to the east of the asset do not contribute to its significance.

### Impact

481. The proposed development would introduce a new tall building in the vicinity of the listed London Wall buildings. This would be seen in the context of an established group of tall buildings. In views from London Wall looking towards the development site, including View 12, the proposed development would be seen in front of taller buildings, including 110 Bishopsgate. In views of the asset from Finsbury Circus, including View 10, the proposed development would appear in the context of Tower 42 and 22 Bishopsgate which rise taller than it. The proposed development, when visible in views of this asset, it would be seen in the context of existing taller buildings and consistent with the character of the views to the east of the asset. The positive elements of the setting of London Wall buildings, including the Finsbury Circus arrangement and Carpenters' Hall would remain unaffected.

482. The proposed development, in baseline and cumulative scenarios, would not affect the significance of this asset, or the ability to understand and appreciate it.

### Finsbury House (Grade II)

#### Significance

483. Finsbury House dates from 1877, designed by E C Robins in an enriched Classical style. It has historic interest as it marks the initial phase of transformation of Finsbury Circus, shifting from a Georgian residential neighbourhood to a hub of commercial offices in the late 19<sup>th</sup> century. Architectural interest derives from its ornate Classical style and imposing stone façade. It forms a cohesive ensemble and has group value with the other buildings at Finsbury Circus.

#### Setting

484. Finsbury House is located in the south-eastern quadrant of Finsbury Circus, in the corner of Blomfield Street and Finsbury Circus, and adjacent to London Wall Buildings, to the north.
485. The setting of this asset is informed by its location at Finsbury Circus, with all buildings, structures and landscaping associated with the planned arrangement making a positive contribution to its setting. Development in its immediate setting is of relatively similar scale. However, development further east and south-east, in its wider setting, includes tall buildings within the Eastern Cluster, including 110 Bishopsgate, 99 Bishopsgate and 22 Bishopsgate. Dashwood House, directly north of the application site is also visible in some views of the listed building. These modern elements of its setting, including the application site, to the east of the asset do not contribute to its significance.

#### Impact

486. The proposed development would introduce a new tall building in the vicinity of the listed Finsbury House. This would be seen in the context of an established group of tall buildings. In views of the asset from Finsbury Circus, including View 10, the proposed development would appear in the context of Tower 42 and 22 Bishopsgate which rise taller than it. The proposed development, when visible in views of this asset, it would be seen in the context of existing taller

buildings and consistent with the character of the views to the east of the asset. The positive elements of the setting of Finsbury House buildings, including the Finsbury Circus arrangement would remain unaffected.

487. The proposed development, in baseline and cumulative scenarios, would not affect the significance of this asset, or the ability to understand and appreciate it.

### Salisbury House (Grade II)

#### Significance

488. Salisbury House occupies the whole south-west quadrant and was built between 1899 and 1901, to the designs of Davis and Emmanuel. It is a French-style building in Bath stone, with extensive embellishment and the cornice in straight sections against the concave front.
489. It has historic and architectural interest as an imposing commercial building in the French style, constructed at the turn of the 19<sup>th</sup> to the 20<sup>th</sup> century, featuring intricate decorative elements.
490. Although a later addition, Salisbury House reflects the grand architecture and formal arrangement of Finsbury Circus and has group value with the buildings surrounding Finsbury Circus.

#### Setting

491. The setting of this asset is informed by its location at Finsbury Circus, with all buildings, structures and landscaping associated with the planned arrangement making a positive contribution to its setting. Modern development of various scale informs its surroundings, including 21 Moorfields to the west. Development further east and south-east, in its wider setting, includes tall buildings within the Eastern Cluster, including 110 Bishopsgate, 99 Bishopsgate and 22 Bishopsgate. Dashwood House, directly north of the application site is also visible in some views of the listed building. These modern elements of its setting, including the application site to the east of the asset does not contribute to its significance.

#### Impact



492. The proposed development would introduce a new tall building in the vicinity of the listed Salisbury House. This would be seen in the context of an established group of tall buildings. In views of the asset that would include the proposed development along London Wall, it would appear in from of 110 Bishopsgate at a lower height. The proposed development, when visible in views of this asset, it would be seen in the context of existing taller buildings and consistent with the character of the views to the east of the asset. The positive elements of the setting of Salisbury House buildings, including the Finsbury Circus arrangement would remain unaffected.
493. The proposed development, in baseline and cumulative scenarios, would not affect the significance of this asset, or the ability to understand and appreciate it.

Business School, London Metropolitan University (Electra House, Grade II)

#### Significance

494. Electra House designed in 1900-3 in the Classical style and is now occupied by the London Metropolitan University.
495. The building has architectural and historic interest as an imposing commercial building from the early 20<sup>th</sup> century, in Classical style by Belcher de Joass. Artistic interest derives from decorative elements including sculptures by George Frampton. It forms a cohesive ensemble and has group value with the other buildings at Finsbury Circus.

#### Setting

496. All buildings, structures and landscaping associated with the planned arrangement of Finsbury Circus make a positive contribution to its setting.
497. There is a mix of historic and modern development in the vicinity of this asset, with historic buildings, including the listed buildings around the listed Globe Public House to the west making a positive contribution to the significance of this asset. Modern development of bigger scale is also present to the west, including Moor House and 21 Moorfields. Development further east and south-east, in the wider setting of the asset, includes tall buildings within the Eastern Cluster, including 110 Bishopsgate, 99 Bishopsgate and 22 Bishopsgate. Dashwood House, directly north of the application site is also visible in some

views of the listed building. These elements of its setting, including the application site to the east of the asset do not contribute to its significance.

### Impact

498. There would be some limited visibility of the proposed development, in views of the listed building on and along Finsbury Circus (the street), and from some small area on Moorfields. In such views, the development would be seen in the context of a group of tall buildings, including One Bishopsgate Plaza, 110 Bishopsgate, 99 Bishopsgate and 100 Bishopsgate are seen, most of which are taller than the proposed building at 55 Old Broad Street. As such it would be consistent with the character of the views to the east of the asset. The positive elements of the setting of Electra House, including the Finsbury Circus arrangement would remain unaffected.
499. The proposed development, in baseline and cumulative scenarios, would not affect the significance of this asset, or the ability to understand and appreciate it.

### Park House and Garden House

#### Significance

500. Park House and Garden House has historic and architectural interest as an imposing early 20<sup>th</sup> century building in the Classical style with a symmetrical composition, designed by Gordon and Gunton.
501. It has group value with the other buildings around Finsbury Circus.

#### Setting

502. All buildings, structures and landscaping associated with the planned arrangement of Finsbury Circus make a positive contribution to the setting of this asset.
503. There is a mix of historic and modern development in the vicinity of this asset, with historic buildings, including the listed buildings around the Globe Public House to the west making a positive contribution to the significance of this asset. Modern development of bigger scale including Moor House and 21 Moorfields is present to the west of the site. Development further east and

south-east, in the wider setting of the asset, includes tall buildings within the Eastern Cluster, including 110 Bishopsgate, 99 Bishopsgate and 22 Bishopsgate. These modern elements of its setting, including the application site to the east of the asset do not contribute to its significance.

#### Impact

504. There would be some limited visibility of the proposed development, in views that include the listed building from Finsbury Circus looking east, including View 10. In such views, the development would be seen in the context of a group of tall buildings, including One Bishopsgate Plaza, 110 Bishopsgate, 99 Bishopsgate and 100 Bishopsgate are seen, most of which are taller than the proposed building at 55 Old Broad Street. As such it would be consistent with the character of the views to the east of the asset. The positive elements of the setting of Park House and Garden House, including the Finsbury Circus arrangement would remain unaffected.
505. The proposed development, in baseline and cumulative scenarios, would not affect the significance of this asset, or the ability to understand and appreciate it.

#### Lutyens House (Grade II)

506. Lutyens House, also known as Britannic House, was designed by Edwin Lutyens in 1924-27. It has historic interest as an early 20<sup>th</sup> century office building by Edwin Lutyens. Being Lutyens first large and elaborate corporate project, adds to its historic interest. Architectural interest derives from the appreciation of its elaborate free Classical style. It has group value with the other buildings at Finsbury Circus.

#### Setting

507. All buildings, structures and landscaping associated with the planned arrangement of Finsbury Circus make a positive contribution to the setting of this asset.
508. There is a mix of historic and modern development in the vicinity of this asset, with historic buildings, including the Grade II listed Church of St Mary Moorfields to the north making a positive contribution to the significance of this asset. Modern development of bigger scale including Moor House and 21 Moorfields

is present to the west of the asset. Development further east and south-east, in its wider setting, includes tall buildings within the Eastern Cluster, including 110 Bishopsgate, 99 Bishopsgate and 22 Bishopsgate. These modern elements of its setting, including the application site to the east of the asset do not contribute to its significance.

#### Impact

509. The proposed development would be visible in some views of the asset, when looking east with View 10, being a representative view, although to the east of the listed building. In such views, the development would be seen in the context of a group of tall buildings, including One Bishopsgate Plaza, 110 Bishopsgate, 99 Bishopsgate and 100 Bishopsgate are seen, most of which are taller than the proposed building at 55 Old Broad Street. As such it would be consistent with the character of the views to the east of the asset. The positive elements of the setting of Park House and Garden House, including the Finsbury Circus arrangement would remain unaffected.
510. The proposed development, in baseline and cumulative scenarios, would not affect the significance of this asset, or the ability to understand and appreciate it.

#### Carpenters' Hall (Grade II)

#### Significance

511. Carpenters' Hall has historic interest as a late 19<sup>th</sup> century building and a livery hall for the Carpenters Company which has occupied this site since the mid-15<sup>th</sup> century. Historic interest also derives from the association of the existing building with W.W. Pocock who designed it retaining original fabric and decorative elements from the Company's original hall. Architectural style derives from its Italianate style and prominent elevations.
512. It is considered to have group value with Draper's Hall, at the southern end of Throgmorton Avenue and London Wall buildings to the northern side of London Wall.

#### Setting

513. Historic buildings in the immediate setting of the asset, including the building at Finsbury Circus make a positive contribution to the setting of this asset. Development further east and south-east, in its wider setting, includes tall buildings within the Eastern Cluster, including 110 Bishopsgate, 99 Bishopsgate and 22 Bishopsgate. These modern elements of its setting, including the application site to the east of the asset do not contribute to its significance.

#### Impact

514. The proposed development would be visible in some views of the asset, from London Wall looking east. In such views, the development would be seen in the context of a group of tall buildings, including One Bishopsgate Plaza, 110 Bishopsgate, 99 Bishopsgate and 100 Bishopsgate are seen, most of which are taller than the proposed building at 55 Old Broad Street. As such it would be consistent with the character of the views to the east of the asset. The positive elements of the setting of Carpenters' Hall including its relationship with London Wall Buildings to the north would not be affected by the proposed development.
515. The proposed development, in baseline and cumulative scenarios, would not affect the significance of this asset, or the ability to understand and appreciate it.

#### City of London Club (Grade II\*)

#### Significance:

516. 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:

517. 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 of different 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. These modern elements do not contribute to the asset's significance.

#### Impact

518. Part of the proposed development would be visible from this asset to the north, in the context of modern development, including existing tall buildings. These tall buildings include the Tower 42 which is situated in very close proximity, to the north-east of this listed building. The proposed development would appear to be part of an existing group of tall buildings, in the vicinity of the site. It would not affect any positive aspects of the setting of the listed building, including the narrow historic street or the relationship of this listed building with other historic properties to the south. The proposed development, in baseline and cumulative scenarios, would not have an impact on the significance of this heritage asset, including the ability to understand and appreciate the asset.

#### Bank Conservation Area

519. 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.

#### Significance

520. The majority of the Conservation Area 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.
521. 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:

522. 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.
523. 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.
524. 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.

#### Impact

525. There will be some limited visibility of the proposed development from the Conservation Area, mainly along the southern section of Old Broad Street, a small portion of Threadneedle Street, and along London Wall. It would not be visible from most of the Conservation Area, including Bank Junction.
526. When visible the proposed development would be seen in the context of existing tall buildings, including Tower 42 and when viewed from points to the south, No. 125 Old Broad Street. In views along London Wall, it would be seen along with the tall buildings of 99, 100, and 110 Bishopsgate, located beyond the boundaries of the Conservation Area. The Proposed Development would be consistent with the existing character of such views and would typically be



seen at a lower apparent height than 100 and 110 Bishopsgate. It would contribute to a coherent progression in building height towards these structures, along with 99 Bishopsgate.

527. The relationship of the conservation area to the Finsbury Circus Conservation Area and New Broad Street Conservation Area to the north, and the Guildhall Conservation Area to the west, would be unaffected by the proposed development.
528. The proposed development, in baseline and cumulative scenarios, would not have an impact on the significance of this heritage asset, including the ability to understand and appreciate the asset.

#### 1 Old Broad Street (Grade II) – View 15

##### Significance

529. This is a stone faced building of 1903 by Chatfield Clarke. It has three main storeys above the ground floor, with two attic storeys at the top, and occupies a triangular plot at the junction of Threadneedle Street and Old Broad Street
530. It has architectural and historic interest as an early 20th century building in restrained neo-classical style, illustrative of commercial development in the area.

##### Setting

531. The prominent corner location of the building, and surrounding buildings of similar scale and style contribute to its significance. Moving away from its immediate context to the north and east there are many tall buildings, including Tower 42 and 22 Bishopsgate in views from the south-west, which appear prominently behind the No. 1 Old Broad Street. These modern elements of its setting do not make any contribution to its significance.

##### Impact

532. The proposed development would be visible in some views of the listed building. An example includes View 15 in the THVIA where the proposed development would appear to the left, in a much lower apparent height than Tower 42 that rises very prominently behind the listed building. In the cumulative scenario that includes the RTG 55 Bishopsgate, a taller building would appear behind Tower 42.

533. It is considered that the proposed development would introduce a modest change to the setting of this asset, that would however appear in the context of other tall buildings already prominently visible in the background and in some cases directly behind the listed building. As such, it would be consistent with the character of its wider surroundings and, in baseline and cumulative scenarios, would not affect the significance of the assets, or the way to understand and appreciate it.

#### Metropolitan Arcade (non-designated asset)

#### Significance:

534. 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:

535. 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\*). Modern tall development in the vicinity of this asset, including Dashwood House to its south is a neutral element of its urban context.

#### Impact

536. The proposed development would be visible from this asset, in views to the south. It would be consistent of the character of development in the area, featuring many tall buildings. It would not affect the significance of the asset as an arcade associated with a major railway station or its relationship with any of the assets that make a positive contribution to its significance identified above. As such the proposed development, in baseline and cumulative scenarios, would preserve the significance of this asset, and its understanding and appreciation.

## St Botolph's Churchyard (non-designated asset)

537. St Botolph's Churchyard includes the open space to the south and south-west of the Church of St Botolph without Bishopsgate. Its origins date back to the 15th century, and it was expanded to its current size in 1760. In 1863, it was transformed into a public garden. It includes an east-west path that runs through the application site and connects Bishopsgate and Old Broad Street. The Church Hall is located within the north-western part of the Churchyard, as well as the Bishopsgate Parish memorial, two drinking fountains, three overthrows and lanterns, all of which are Grade II listed and discussed earlier in this section.

### Significance

538. This historic area, despite changes over the years, holds historic interest as a historic churchyard associated with the Church of St Botolph. It is a defining element of the setting of the Church, the Church Hall, and the other listed structures with which it has group value. Some artistic interest derives from the design of the Churchyard, including paths and landscaping. There is a sense of calm within the Churchyard that contrasts with the busy roads that surround it.

### Setting

539. The setting of the Churchyard has changed drastically over the years, especially in the post-war period. The Church, Church Hall and listed structures it includes make a significance contribution to it. Tall buildings form part of the setting of the Churchyard, including Dashwood House, immediately to the west but also the Crosspoint building to the north, and One Bishopsgate Plaza and 110 Bishopsgate on the eastern side of Bishopsgate. These modern elements do not contribute to its significance

### Impact

540. Tall buildings already form part of the setting of this asset. The proposed development would replace an existing post-war building with a taller one, which would be visible in views from the Churchyard, looking west. Given the extent of tall development in the vicinity of the asset, the proposed development

would form part of a consistent character, defined by tall buildings, and not as an isolated feature.

541. The relationship of the Churchyard with the Church, Church Hall and structures within it, it would not be affected as a result of the proposal.
542. Therefore, the significance of the Churchyard would not be affected by the proposed development, in baseline and cumulative scenarios.

### **Loss of an elevated walkway**

543. The proposals include the removal of a raised walkway over Wormwood Street attached to the existing building at 55 Old Broad Street. This raised walkway is part of a system of elevated walkways known as "pedways", constructed from the mid-1960s as part of the post-war redevelopment of the City of London, which had suffered extensive damage during World War II.
544. The main purpose of these pedways was to address the increasing car ownership and travel during the 1950s and 1960s by offering high-level walkways to separate pedestrians from street-level traffic and ensure safety and convenience.
545. While an extensive network of pedways was initially planned, only a portion of it was actually built, and many of the constructed pedways have since been demolished. However, a few pieces of this elevated walkway system still exist, primarily located north of London Wall.
546. The walkways were of varied quality and design. The walkway over Wormwood Street provided a north-south link from Liverpool Street towards Leadenhall Market and the Bank of England. Currently, it has no public access or other function, except for its use as part of a fire escape.
547. The 20<sup>th</sup> Century Society has objected to the planning application due to the proposed complete loss of the elevated walkway. They ask the City of London to identify the bridge link as a non-designated heritage asset. They state that: *"The Society considers the pedway to have high significance as an increasingly rare and idiosyncratic feature of the post-war urban landscape of the City. Its heritage significance should be recognised and it should be conserved and incorporated into any proposed redevelopment of the site. While it may no longer provide a key pedestrian route through the City, the walkway has clear heritage value and creative use could be made of it, as happened in 2018 when it hosted the Bridging Home sculpture by artist Do Ho Suh."*

548. The structure has been considered against the relevant criteria in Historic England Advice Note 7 as a potential non-designated heritage asset. It is considered that the structure's design and materials are unexceptional rather utilitarian and is not considered to possess sufficient architectural interest. There is some very limited historic interest as a raised walkway that formed part of an extensive network that was however never materialised in full. Better examples, including examples in the Barbican survive and can be appreciated in the area. It is not considered to hold any associations with events, individuals or organisations of historic interest. The art installation of 2018 by artist Do Ho Suh is not considered to add sufficient associative value to the structure. It is not of an age, landmark status or rarity above the norm and while there is some very limited group value with the remaining pedways in the City, it is not considered to have sufficient heritage significance to be a non-designated heritage asset in its own right.
549. Its removal is considered acceptable in design and heritage terms. Its removal would open up and declutter views along Worwood Street.

#### Other Heritage Assets

550. 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 THVIA Tables 5.2 and 5.3 include lists of heritage assets which were scoped in and out. The designated heritage assets considered included but not exclusively so:
- Guild Church of St. Ethelburga the Virgin Listed building (Grade I)
  - 51-53 Threadneedle Street Listed Building (Grade II\*)
  - 162 and 164 Bishopsgate Listed Building (Grade II)
  - 1, 3 and 5 Stone House Court Listed Building (Grade II)
  - British Linen Bank Listed Building (Grade II)
  - Lloyds Bank Listed Building (Grade II)
  - 18 Old Broad Street Listed Building (Grade II)
  - 13-17 Old Broad Street Listed Building (Grade II)
  - 123 Old Broad Street Listed Building (Grade II)
  - 26 Throgmorton Street Listed Building (Grade II)

- 43-47 Threadneedle Street Listed Building (Grade II)
- 41 Threadneedle Street Listed Building (Grade II)
- St. Helen's Place Conservation Area
- Leadenhall Market Conservation Area
- Bow Lane Conservation Area

551. The settings and contribution to significance of these heritage assets would not be affected by the proposals due to the relative distance of the proposal from them, and intervening development resulting in little intervisibility between them. It is the view of 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 THVIA (Officers agree with that scoping exercise). Officers consider that the identification of heritage assets which may be affected, and the assessment of impact on significance as set out in the THVIA and in this report, are proportionate to the significance of the assets and to the nature and extent of the proposed development. 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**

552. Overall the proposals would preserve the significance and contribution of setting of all the aforementioned heritage assets except that of St Paul's Cathedral, which would experience a slight level of less than substantial harm through the slight erosion of its clear sky setting in the views from the northern end of Waterloo Bridge illustrated by LVMF 15B.1.
553. As such, the proposal would result in very minor conflict with Local Plan Policies CS12, DM12.1, 12.5, CS13 (1 and 2), draft City Plan policies S11 and London Place HE1 and HC1, and with the objective set out in Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.
554. 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.
555. Objections have been received from Historic England, The Victorian Society, The Georgian Group, Historic Buildings and Places, The Twentieth Century Society, The Surveyor to the Fabric of St Paul's Cathedral and SAVE (Britain's

Heritage). Officers have considered these representations carefully and afford them considerable importance and weight. There is some consensus, but some clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.

## **Archaeology**

556. The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: City of London APA. The site lies partially over the Scheduled Monument of the Roman wall. The city ditch, of Roman and medieval date, also runs through the site. The site is also located directly adjacent to, and partly over, the burial ground of St Botolph without Bishopsgate.
557. An archaeological desk based assessment (MOLA 2023) was submitted with the planning application which highlights that significant archaeology has been found in the vicinity of the site. An archaeological evaluation was carried out comprising test pits and boreholes in the expected vicinity of the Scheduled wall (MOLA 2021-22). No evidence for the Roman city wall was identified and the levels of truncation on the site, compared with the known levels of the wall nearby, indicate that the wall is likely to have been completely truncated by previous development on the site. However, the city ditch was dug to a greater depth than the wall and there is therefore some potential for the base of this feature and other deep cut features to survive beneath the current single storey basement. No archaeology is expected to survive in the double basemented area.
558. In the eastern part of the site there is to be an extension of the secant piled wall and some new piling along the eastern boundary, which may extend into the former churchyard of St Botolph's. Historic England have commented that as proposed and previous impacts are not well understood in this location, archaeological evaluation is recommended to establish if any remains of the burial ground survive.
559. Although the evaluation found no evidence for the survival of the Scheduled Roman and medieval wall, Scheduled Monument Consent will still need to be obtained in advance of construction work commencing.
560. Historic England have advised that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation 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 they consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the



nature and extent of surviving remains, followed, if necessary, by a full investigation which would be secured by condition.

### **Public Access and Inclusivity**

561. 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.
562. A total of 92 short-stay visitor cycle parking would be provided, including 20 externally at ground floor level, and the remaining 72 in the visitor cycle 'pod' building. A total of 583 long stay cycle parking spaces would be provided within the building at Basements 1 and Basement 2 and the pod. These spaces would be accessed by a dedicated cycle lift/stairs in 65 Old Broad Street and the existing ramp to the north of the site or by dedicated stairs and lifts within the pod building. In addition, 42 showers and 389 lockers would be provided.
563. The majority of cycle spaces would be two-tier racks, 15% of spaces will be for folding bikes and a further 5 % will be vertical stands that are able to accommodate a mix of larger cycles ensuring that the requirements of the LCDS (2014) are achieved.
564. In terms of changing accommodation, showers and changing rooms are easily accessible from the cycle store. The end of trip facilities are shared across two areas in B1; in 65 Old Broad Street and in the core of 55 Old Broad Street. Onward access to the workspace reception is via the passenger/goods lift located within the main core. Male and female showering areas are provided at B1 level alongside an accessible WC/shower, with further showering facilities in the main 55 Old Broad Street core at B1 level.
565. The proposed development is car-free except for two blue badge parking spaces located at basement level. These would be located in a managed area controlled by building management. Delivery and servicing activity will take place between 23:00-7:00 to minimise the risk of any clash with users during office hours. In addition, accessible parking bays will include access zones to one side and the rear as required by Approved Document M.
566. It is proposed that all new entrances will be designed to meeting the guidance of Approved Document M Volume 2. Two new entrances to 55 Old Broad Street will have revolving doors with accompanying swing pass doors. The latter will have a clear opening width of at least 1000mm. Access to the main entrance to 65 Old Broad Street is direct, with level-access provided to a set of automated double doors. Set to open simultaneously, the doors will provide a clear opening width of 1400mm. Access to the main entrance to the Bath House is direct, with

level-access provided to a set of automated double doors. Set to open simultaneously, the doors will provide a clear opening width of 1400mm. Details of the lobby and reception are to be developed at a later design stage.

567. The existing Bath House basement is not fully accessible, being provided with a stair only. The proposal adds a dedicated lift for the Bath House serving ground and B1 level. The adjustments to the location of the lift form part of the amendments to the scheme submitted on the 29<sup>th</sup> September 2023 so that the lift is fully outside more sensitive elements of the fabric of the Listed Building. All Bath House visitors will use the same entrance at ground level, with the option of then using the stairs or the lift. Manifestation will be included for the glazed link structure in line with Approved Document K.
568. Horizontal circulation such as the effective clear widths of internal doors and security barriers, widths of corridors and passing places and circulation routes would be step-free and would meet minimum requirements and are satisfactory. All of the internal spaces across the application site will have open floor plans.
569. 55 Old Broad Street has lift access to all floors. Provision will be made for nine passenger lifts with two designated as fire-fighting lifts and one as an evacuation lift, and one goods lift in the main core. Four of the lifts will serve ground through level 11. One fire-fighting passenger lift will serve Basement 1 through level 22. Another fire-fighting passenger lift and one evacuation lift will serve ground floor through level 22. The two remaining lifts will serve ground floor and level 12 through to level 22. The goods lift will serve Basement 2 through to level 23. A cycle lift will serve ground through level 2 in the cycle pod. 65 Old Broad Street has lift access to all floors. Provision will be made for one passenger / fire-fighting lift that will serve ground floor through level 4. The cycle lift will serve level Basement 2 level through ground floor level. new platform lift will provide step-free access between ground floor and Basement 1 in the Bath House.
570. The proposed cultural events spaces are also designed to meet Approved Document M guidance. The doors to access the terraces proposed from first to twenty-second level at 55 Old Broad Street and on Level 2 at 65 Old Broad Street will have a minimum clear opening of 1000mm.
571. A single unisex wheelchair-accessible WC will be provided at ground floor level and a single unisex wheelchair accessible cubicle within the wider WC block provided for staff and visitors on each floor of 55 Old Broad Street. A wheelchair-accessible WC has also been proposed in basement 1 of the Bath House due to the limited amount of space available in the reception area at ground floor level. A lift will provide step-free access and the travel distance will be within 40m.

572. There will be no provision of a single unisex wheelchair accessible toilet in the northern entrance of 65 Old Broad Street as there is no reception at this level. A wheelchair-accessible WC is proposed on levels 3 and 4 of 65 Old Broad Street. In 65 Old Broad Street, provision will be made in the ground floor retail space for a unisex wheelchair-accessible WC. The provisions outlined will be reviewed at later design stages.
573. 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**

574. Policy S1 in the London Plan states that development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported. The cultural/ events space proposed is intended to be used for a range of functions, such as educational events / seminars, by local schools, cultural groups or charities. Moreover, this use will help support a range of other important policies in the Local Plan Policy CS22 (that looks to maximise opportunities to engage residential and working communities through new facilities), London Plan Policies S1 (that promotes new social infrastructure including publicly accessible space for local community use) and E11 (that supports education and training opportunities), and draft City Plan Policy HL5 (that supports new flexible, multi-use space).
575. Local Plan policies CS11 and DM11.2 and draft City Plan 2036 Strategic Policy S6 encourage new cultural experiences and art works. A Cultural Plan has been submitted in accordance with draft City Plan 2036 Strategic Policy S6.
576. A Cultural Plan has been prepared by AND London which sets out how the cultural contribution from the proposed development scheme will deliver two cultural venues including the restoration of the Grade II Listed Bath House to provide a cultural offer and the transformation of 65 Old Broad Street into a new creative workspace.
577. The key elements will include:
- Sensitive restoration of the Grade II Listed Bath House (as in LPA Ref 23/00966/LBC) to be publicly accessible as a cultural space.
  - Creation of '65 Old Broad Street Studios', a creative incubator space providing affordable workspaces for artists/makers whilst also delivering a public program of workshops for a wide audience.
  - Independent, creative, retail space at ground floor.
  - Opportunities for art installations in the public realm.

578. The proposed development would provide 31sqm of cultural/event floor space at Level 2 of 65 Old Broad Street and 320sqm of cultural/event floor space at the Bath House.

#### The Bath House

579. The large space underneath the Bath House is proposed to be opened to the public and a cultural programme will be managed by an operator upon its reopening in 2028 once works have been completed to restore it.
580. The Bath House is proposed to be open 10.00 -18.00 with out of hours for specific events or bookings.
581. The functions of the Bath House will also focus on skills development with sessions for the community and public audiences such as performing arts workshops, well-being activities such as music/art therapies, movement workshops, coaching/live music supported by the operator, an artist programme and a public programme. The space will be free to use, accessible and welcoming and will be a bookable space.

#### 65 Old Broad Street

582. Hive Curates have taken occupation of the space for 18 months from July 2023 as an initial trial period prior to the construction phase of development.
583. On the ground floor of 65 Old Broad Street, flexible retail / café / maker / studio space secured as affordable retail linked to the maker / studio space on the upper levels of the building is proposed. The proposed development will deliver 243 sqm GIA of flexible maker / studio workspace at level 1 of the retained 65 Old Broad Street building, which will be made available to qualifying users at discounted market rent.
584. The second floor of the retained building would be an open terrace overlooking Old Broad Street to the west. This would be available for general amenity and events related to the activities of the tenants of the building and also associated with the use of the Bath House where other cultural/events floorspace is provided.

#### Summary

585. The applicant has actively engaged with several potential partners who would appropriately deliver the proposed developments cultural offer. Separate operators will be selected for both the Bath House and 65 Old Broad Street in order to deliver the long term visions on completion of the overall development.

The operator for 65 Old Broad Street will be responsible for leasing the ground and first floor of 65 Old Broad Street at affordable rents whilst also managing the public programme of workshops.

- 586. The public spaces within the building will be managed by a cultural project manager who will identify content partners to programme the art installations and events and ensure that the programme aligns with the aspirations of the Destination City and EC BID businesses.
- 587. 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.

## **Highways**

### Public Transport

- 588. 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 Southeastern.
- 589. The Site is bound to the west by Old Broad Street, from which vehicles can currently access.
- 590. Beyond the site, to the east is A10 Bishopsgate, and to the south of the site A1211 Wormwood Street. Liverpool Street runs east to west a short distance to the north of the site, with an entrance to Liverpool Street station on this road.
- 591. Public transport options locally include 20 daytime bus routes, national rail services from Liverpool Street and Moorgate stations, as well as London Underground, Overground and Elizabeth Line services. Local buses near the site also facilitate shorter journeys.

### Trip Generation

- 592. It is anticipated that the majority of trips to the Site would be by public transport, with the last part of the journey undertaken on foot or cycle. Liverpool Street

Station is within 100 metres of the Site and Moorgate within 600 metres. Rail would continue to be an attractive transport mode for those site users coming from outer London boroughs and from outside London.

593. As part of the development proposals, improved walking routes would be created through the site within two new north-south route (Old Broad Street - Wormwood Street) to accommodate the increased trips and pedestrian comfort levels.

#### Pedestrian Comfort Levels (PCLs)

594. To understand existing pedestrian flows in and around the site, extensive surveys were undertaken.
595. The main access to the Site at present is along the eastern footway on Old Broad Street. The highest pedestrian flows along the Old Broad Street Eastern footway reached 2,471 (73% primary circulation) in the AM peak (08:00-09:00) and Wormwood Street reached 804 (27% secondary circulation) AM peak.
596. Old Broad Street eastern footway and the Wormwood Street northern footway are considered to be the footways on which pedestrian flows to and from the proposed development will have the greatest impact.
597. The above assessment estimates that the Pedestrian Level of Comfort (PCL) on the existing footways would fall to a level of D in Old Broad Street and B+ in Wormwood Street following occupation of the development, if no footway improvements are made. TFL guidance on PCLs considers levels of B- and C+ acceptable for office and retail locations however, the City's recommended minimum level for all areas is B+.
598. To improve pedestrian comfort levels, the new development will allow for new routes for pedestrians, widening of the existing footways (Old Broad Street and Wormwood Street), raised crossing and junction improvement works. These works will be delivered as part of the highways works, under a Section 278 Agreement (Highways Act 1980).
599. The approach will bring significant enhancement to the area and public and compliant with London Plan Policy T2 (Healthy Streets) and London Plan Policy T4 Assessing and Mitigating Transport Impacts.

#### Cycle Parking

600. 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.

601. Underneath 65 Old Broad Street, the B1 and B2 levels include the long-stay cycle provision and end of trip facilities for users of both 55 and 65 Old Broad Street. These can be accessed via the existing ramp that can be entered off Old Broad Street, which circles down and around Dashwood House and into the basement, or via a new lift from a dedicated cycle lobby on the rear ground floor of 65 Old Broad Street.
602. 583 long stay cycling parking spaces (of which 471 spaces will be located within the basement and 112 spaces within the Visitor Cycle Pod) and 92 short stay cycle space (of which 72 spaces will be located in the Visitor Cycle Pod and 20 spaces externally). The scheme is in compliance with Local Plan Policy 16.3 and London Plan policy 6.9.
603. The level of cycle parking proposed as part of the development is compliant with the London Plan requirements.

#### Servicing and Deliveries

604. 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.
605. The proposals seek to maintain existing servicing arrangements via a ramp to the north of the site, where vehicles would enter in forward gear, and make use of the second basement. Due to site constraints, the maximum size of vehicle has been limited to 8 metres. Delivery, servicing and waste operations would be privately managed.
606. The applicant proposes the use of an off-site consolidation centre for deliveries and, when applying a 25% reduction to account for this, it is estimated that there will be an average daily servicing requirement of 50 delivery vehicles.
607. 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 most of the deliveries overnight from 23:00 - 07:00 with some of the deliveries during the day, outside peak-hours. Cargo bikes would be permitted to access the proposed internal off-street servicing area during these times.



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

#### Highways Works – S278 Agreement

609. To mitigate the impact of the development on the public highway, the applicant will be required to enter into a Section 278 Agreement.
610. The scope of the fully funded works are (but not limited to):

- A raised pedestrian crossing on Wormwood Street in line with the new eastern pedestrian route
- Reconstruction of the footways fronting the application site in Yorkstone Paving
- Widening of the Old Broad Street eastern footway in Yorkstone paving
- Associated drainage works, to accommodate the new raised table
- Associated road markings to suit the new road layout
- Relocation/removal of street furniture to suit new layout
- A raised pedestrian crossing on Old Broad Street, connecting New Broad Street with the Site.
- Resurfacing the carriageways fronting the applicant's site
- Installation of loading bays, subject to traffic orders and road safety audits

#### Car Parking

611. 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.
612. Local Plan PolicyDM16.5 (2) states that designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements.
613. 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.’

614. The proposed development is car-free except for two blue badge parking spaces located at basement level. These spaces will be accessed via a dedicated booking system managed through the building management team and accessed via the same ramp used for deliveries, servicing and waste vehicles to the north of the Site. Give the context of the application site, this is considered to be acceptable.

#### Oversailing

615. The proposed oversailing is considered acceptable in highways terms and will not prohibitively impact pedestrian or vehicular movements. An oversailing licence under a Section 177 of the Highways Act 1980 would be required.

#### Consultation Logistics Plan

616. 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.

#### City Walkways

617. As set out in the heritage section above, the removal of the structure is considered to be acceptable on that basis. The loss of the elevated walkway is not considered to compromise the pedestrian environment given the improvements proposed public realm, increased desire lines together with the range of s278 agreement measures identified. The discontinuance of the walkway is subject to a separate approvals process outside of planning, however the principle of this is accepted. Transportation Conclusion
618. 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**

619. 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

620. 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.
621. 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.
622. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
623. 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.
624. Assessments have been carried out for both the windiest season and the summer seasons and this is covered in Chapter 11 (Microclimate) of the Environmental Statement Volume 1 with a detailed technical report included as an appendix in Volume 3 of the Environment Statement.
625. 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

626. The wind microclimate across the Site was tested for the following configurations:
- Configuration 1: The existing Site with the existing surrounding buildings (The Baseline);
  - Configuration 2: The Proposed Development with the existing surrounding buildings;
  - Configuration 3: The Proposed Development with the existing surrounding buildings, existing and proposed landscaping and wind mitigation measures;
  - Configuration 4: The existing Site with the cumulative schemes (Future Baseline);
  - Configuration 5: The Proposed Development with the cumulative schemes;
  - Configuration 6: The Proposed Development with the cumulative schemes and 55 Bishopsgate scheme;
  - Configuration 7: The Proposed Development with the cumulative schemes and 55 Bishopsgate scheme, existing and proposed landscaping and wind mitigation measures; and
  - Configuration 8: The existing Site with the Cumulative schemes and 55 Bishopsgate scheme.
627. A separate CFD assessment comprising the Site and the surrounding area within a 400m radius of the centre of the Site has been carried out by GIA in accordance with the CoL Wind Microclimate Guidelines. The CFD results have been broadly compared to the wind tunnel assessment with emphasis on the differences found in terms of significance.
628. A two tier cumulative assessment has been undertaken due to the variation in the statuses of nearby schemes and planning applications. The primary cumulative assessment (Configuration 4 & 5) comprises of 25 cumulative schemes which all have been either granted permission, have resolution to grant or will be going to planning committee prior to the submission of this planning application. In addition, a secondary cumulative assessment (Configurations 6, 7 and 8) comprising all cumulative schemes plus 55 Bishopsgate (LPA Ref: 22/00981/FULEIA) has been undertaken.
629. In the existing baseline conditions the wind tunnel tests and CFD show that conditions around the site are generally suitable for occasional sitting use, with standing and walking use conditions to the east during the windiest season. This is the expected microclimate at the existing Site as it is sheltered by the

existing mid-rise developments to the south and south-west, where the prevailing winds originate. The independent CFD assessment results reported similar wind conditions ranging from suitable for frequent sitting to walking use during the windiest season.

630. Significant attention is given to the following two receptors throughout the assessments.

- Bus stops (off-site) along Wormwood Street (measurement location 52) - suitable for occasional sitting use during the windiest season.
- Ground Level Amenity Spaces (Spill-out/Café Seating) - The café seating at the junction to the west (measurement location 24) is suitable for frequent sitting use during the summer season.

631. All other café spaces surrounding the existing Site (measurement locations 75, 145, 187, 196 and 197) are suitable for occasional sitting use during the summer season. Occasional Sitting conditions would be one category windier than suitable for the intended use.

632. The wind conditions off-Site would gradually adjust to that with the Completed Development in situ, largely representing a Negligible (not significant) effect. There would be two isolated Major Adverse (Significant) effects relating to wind comfort at measurement locations 24 and 52 (as above) displaying wind conditions two categories windier than the intended use (walking conditions rather than sitting conditions), and a Significant (Moderate Adverse) effect has been identified at the café / spill out seating space for the café located to the west of Site on the corner of Wormwood Street and Old Broad Street (measurement location 24).

633. Additionally, Configurations 2, 5 and 6 have identified areas of the proposed development that would require wind mitigation measures to improve wind conditions to be suitable for the intended occupant uses.

634. As there would be adverse conditions on-Site when the Proposed Development is complete, developed wind mitigation measures should be in place prior to the Proposed Development being complete and occupied to provide suitable conditions for the on-Site users. The following measures have been included within the design of the proposed development as a result of the wind tunnel testing process:

- The inclusion of three 1m deep and one 0.5m deep solid screens underneath the alleyway at the south-east corner of the Proposed Development. These would be full height from ground level to the ceiling and along the eastern edge of the Site;

- A 1.4m high hedge along the perimeter of the Level 20 tenant's terrace and along the perimeter of the private terraces at the south-west corner of the Proposed Development; and
  - The façade of the roof level includes a 70% closed porous mesh.
635. In Configuration 2 'developed measures' including mitigation incorporated within the final design to provide shelter to the remaining spaces within unsuitable conditions. These are listed as follows:
- 2m high, 5m long solid screen (extending from the façade to north) at the north-east corner of the Proposed Development and inclusion of return (to the west) solid screen parallel to the building façade which is 2m high, 6m long (extending from west to east) (to north and east of measurement location 45);
  - Inclusion of a full height, 1.2m long, 70% closed porous screen on the southern façade of the south-west corner terraces at Levels 3-10 and levels 17-21.
636. The following conceptual mitigation measures would be necessary in order to provide suitable conditions for off-Site users:
- Inclusion of 1.5m high, 2m long, "L-shaped" solid screens to the west of the café seating to the west of the Proposed Development; and
  - Inclusion of a bus shelter (3m tall with 1m solid side screens) at the bus stop closer to the south-east corner of the Proposed Development.
637. The above measures would be secured by planning conditions as they are not included in the final design of the proposed development.
638. In Configuration 3, with the inclusion of the existing and proposed landscaping and the proposed on-Site wind mitigation measures only, wind conditions at the Proposed Development would be suitable and safe for the intended uses throughout the year. This would represent Moderate Beneficial (not significant) to Negligible (not significant effects).
639. Consistent with Configuration 2, the following off-Site areas would have wind conditions windier than suitable for the intended use:
- The bus stop closer to the south-east corner of the Proposed Development with walking conditions during the windiest season (measurement location 52); and
  - Spill-out seating to the west of the Proposed Development with occasional sitting use during the summer season (measurement location 24).

640. These conditions would be one category windier than suitable for the intended use and up to two categories windier than Configuration 1. This would represent a Major Adverse (significant) effect and would require conceptual wind mitigation measures. These adverse effects could be dealt with by the inclusion of the conceptual wind mitigation measures, the bus stop and the spill-out seating provisions if considered necessary and if implemented these locations would be expected to have wind conditions similar to that of Configuration 1; which would represent a Negligible (not significant) effect.
641. The independent CFD assessment results reported that the majority of off-Site areas would have suitable wind conditions for the intended use. Consistent with the wind tunnel, the Wormwood Street bus stop would have walking conditions in the windiest season. This would be one category higher than acceptable and two categories higher than Configuration 1, representing a Major Adverse (Significant) effect. However, the spill out seating to the west of the Proposed Development would have frequent sitting use conditions in the summer season which would be acceptable for the intended use.
642. In Configuration 7, on site with the inclusion of the existing and proposed landscaping and the proposed on-Site wind mitigation measures wind conditions at the Proposed Development would be suitable and safe for the intended uses throughout the year. This would represent Moderate Beneficial (not significant) to Negligible (not significant) effects.
643. Consistent with Configuration 6, the following off-Site areas would have wind conditions windier than suitable for the intended use and windier than Configuration 8:
- Off-Site entrances along Wormwood Street with walking conditions during the windiest season (measurement locations 72, 76 and 94). Walking conditions at the entrance represented by measurement location 76 would be marginally over the threshold for walking category.
  - The bus stop close to the south-east corner of the Proposed Development with walking conditions during the windiest season (measurement location 52).
644. These conditions would be one category windier than suitable for the intended use and up to two categories windier than Configuration 8. This would represent a Major Adverse (significant) effect and would require conceptual wind mitigation measures.
645. In the context of the existing surrounding buildings and the Tier 1 cumulative schemes, with the inclusion of the conceptual mitigation measures there would be no significant wind microclimate effects at any location at and around the Proposed Development.



646. In the context of the Tier 2 cumulative schemes (i.e. including 55 Bishopsgate), with the inclusion of the conceptual mitigation measures there would be one occurrence of a Major adverse (significant) effect at the entrance to the existing Coral betting shop on Wormwood Street (measurement location 94). All other locations would have no significant effects.
647. With conceptual wind mitigation measures introduced, the Major Adverse (significant) bus stop and spill out seating effects would be reduced to Negligible (not significant) effects.
648. Amended plans were received on the 29<sup>th</sup> September 2023. In the context of the wind assessment, the amendments include replacing the proposed 1400mm high hedge around the southern and western sides of the Level 20 terrace with metal railing balustrade and reducing the height by 200mm. Within the previous wind tunnel study, the effectiveness of the proposed hedge was assessed in the wind tunnel; with the hedging in place the terrace would have a mixture of frequent sitting and occasional sitting use wind conditions during the summer season, suitable conditions for terrace amenity. To achieve suitable conditions on the Level 20 terrace, it is now recommended that at least 50% closed porous mesh panels are integrated to the railing as the open railing would not be expected to provide shelter from the winds approaching this terrace and the balustrade height (height of the parapet + height of the railing) is 1400mm from the floor level of the Level 20 terrace.
649. Furthermore, the September 2023 Amendments include extending the extent of pub outdoor seating to north. To achieve suitable wind conditions, it is recommended that the developed wind mitigation measures (2m high solid screen) are extended along the northern and eastern side of the pub seating to increase the localised shelter provided to the revised pub seating.
650. The integration of the above recommended measures are expected to have wind conditions similar to that reported in the 2023 Wind Microclimate ES chapter, suitable for the intended use. The requirement for these wind mitigation measures will be reviewed again by an experienced wind consultant and the design team at the next stage of detailed design, and will be subject to an appropriately worded planning condition. As such, the conclusions presented within the Wind Microclimate assessment presented within the 2023 ES are considered to remain valid.
651. A Wind Audit would be secured in the S106 Agreement which would require 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.

652. It is considered that the microclimate in and around the site, with regard to wind conditions, would 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 and Overshadowing

653. 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, whilst avoiding overheating, minimising overshadowing, and maximising the usability of amenity space.
654. 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.
655. 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.
656. Paragraph 3.10.41 of the Local Plan indicates that BRE methods will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Paragraph 3.10.41 of the Local Plan and Policy HS3 of 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.
657. 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*

658. 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*

659. 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*

660. 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.

661. The residential buildings to be considered are those at:

- 26 Wormwood Street
- 25 Wormwood Street
- 5-24 Wormwood Street
- 50 Bishopsgate
- 33 Great St Helen's
- 80 Houndsditch
- Overnight Accommodation at the Carpenters Hall
- Residential Accommodation along New Street
- 3 Devonshire Square
- Drapers Hall, Throgmorton Avenue
- Vergers Flat, The Dutch Church, 7 Austin Friars
- Residential properties on Cree Church Lane
- Jamaica Buildings St Michael's Alley
- 48 Cornhill
- 74 Cornhill
- Merchant Taylors Hall

662. The religious receptors to be considered are those at:

- St Botolph's Church Hall
- St Botolph without Bishopsgate Church
- All Hallows On The Wall

663. The commercial receptors to be considered are those at:

- Railway Tavern Public House, 15 Liverpool St

664. 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.

665. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and for non-domestic buildings where there is a particular requirement for sunlight. In this case officers do not consider that the offices surrounding the application site fall into the category contemplated by the BRE where occupiers have a reasonable expectation of daylight, and officers do not consider that the surrounding offices have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same policy test requirements as residential premises. The dense urban environment of the City, in particular in and around the cluster is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises, the proposed development provides a degree of separation such that it would not have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10.

#### Daylight

666. 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 of the NSL guidelines are not met.
667. 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).

668. Both the London Plan 2021 and the draft City Plan 2036 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.
669. The following scenarios have been assessed:
- Baseline Scenario;
  - Baseline + Proposed Development;
  - Baseline + Proposed Development + Cumulative Schemes Tier One 1-27 The Arcade, Liverpool Street and 1-14 Liverpool Street and 11-12 Blomfield Street);
  - Baseline + Proposed Development + Cumulative Schemes Tier Two (as above plus 55 Bishopsgate).

#### Baseline Scenario

670. The VSC baseline results show that in the current situation, 55% (578 of 1047) windows in the surrounding properties benefit from at least 27% VSC which, in accordance with the BRE guidelines, is considered a good level of daylight. The majority of these windows serve the Pacific Hotel. These baseline results serve to highlight the fact that a significant number of windows within the existing receptors do not achieve the guideline values in the baseline condition.
671. The NSL baseline results show that in the current baseline situation 77% (55 of 71) of the rooms assessed benefit from direct skylight at working plane height to more than 80% of the room's area. These rooms are therefore considered to receive a good level of daylight distribution in accordance with the BRE guidelines. Therefore, the majority of the rooms within the existing receptors do achieve the guideline value which is acceptable given the urban context.
672. The APSH baseline results show that in the current situation 74% (32 of 43) of the total rooms assessed within the surrounding properties benefit from at least 25% total APSH, with at least 5% APSH in the winter months, which is considered to be a good level of sunlight in accordance with the BRE guidelines.
673. In terms of overshadowing 2-hr Sun on Ground assessments and Site-wide transient overshadowing studies have been undertaken to the public amenity spaces within Bishopsgate Courtyard that are likely to be affected. These are:
- Tennis/ Netball Court;

- Public Spaces with Seating; and
- Private Memorial Garden Area

674. The baseline 2-hr Sun on Ground assessments show that these spaces currently experience 2 hours of direct sunlight to 0% of their area on the 21st of March. These baseline results serve to highlight the fact that the amenity spaces assessed do not achieve the guideline values in the baseline condition, this is due to the dense urban context.

#### Daylight

675. A total of 1,047 windows across 9 properties were assessed for daylight. For VSC a total of 21 windows would see losses greater than recommended in BRE Guidelines and would experience a reduction of 20% or more. In particular at St Botolph's Church – Church Hall, St Botolph without Bishopsgate Church and the Church of All Hallows , 83 London Wall.

676. A total of 71 rooms were assessed for daylight. For NSL a total of 2 rooms would see losses greater than recommended in BRE Guidelines and would experience a reduction of 30% or more at St Botolph without Bishopsgate Church.

677. Overall, it is considered that the effect of the proposed development on the daylight availability would be Negligible and Not Significant where results fall within the suggested numerical levels in the BRE guidelines for 6 out of the 9 properties assessed. This includes Railway Tavern Public House, 15 Liverpool St; 26 Wormwood Street; 25 Wormwood Street; 5-24 Wormwood Street; 50 Bishopsgate; and Pan Pacific Hotel, 80 Houndsditch.

678. For St Botolph's Church – Church Hall and All Hallows Church , 83 London Wall, the effect on daylight amenity is defined as Minor Adverse and Not Significant given that the VSC and NSL alterations applicable to the room are no greater than a 30% reduction from their baseline values. St Botolph without Bishopsgate Church experiences daylight alterations beyond the BRE Guidelines and is therefore assessed in greater detail as this will experience a Major Adverse (Significant) daylight effect.

#### St Botolph without Bishopsgate Church.

679. A total of 52 windows serving 7 rooms have been assessed. Of 7 rooms, 3 rooms will experience VSC and NSL reductions that meet the BRE guidelines with reductions less than 20% with effects considered to be Negligible. A further 2 rooms will experience VSC and NSL reductions to a Minor Adverse extent and therefore the effects to these rooms are Not Significant.



680. The remaining 2 rooms will experience daylight reductions which are considered to be Significant (Moderate to Major Adverse) in terms of daylight distribution. The 2 rooms namely, R1/120 and R2/120 are adjacent to the nave of the church and are understood to be a vestry under the organ room and a side vestry. Officers accept that these rooms are auxiliary rooms to the use of the Church. With regards to the retained NSL values, one of these rooms (R1/120) will retain at least 45% NSL which is just slightly below our alternative target criteria of 50%. The remaining room (R2/120) will retain approximately 35%.
681. The majority of windows/rooms are within the BRE guidelines and the two rooms that experience reductions beyond the BRE guidelines are considered secondary spaces (being vestries). In conclusion, when all windows/rooms that serve this property are considered and the use of the spaces which are affected, the overall effect is not likely to be material. Therefore, these results are considered acceptable for an urban area and for this non-residential property.

#### Sunlight

682. The sunlight assessment shows two properties assessed would experience a change in Annual Probable Sunlight Hours (ASPH) and one property assessed would experience a change in Winter Probable Sunlight Hours (Winter PSH). The impacts on these properties are outlined below.
683. Of the 71 residential rooms assessed for daylight, a total of 43 rooms across 5 properties were assessed for sunlight as they have at least one window that is orientated within 90 degrees south.
684. Of the five properties, three are expected to experience Negligible (not significant) sunlight effects. These properties encompass the Railway Tavern Public House, 15 Liverpool Street; Church of All Hallows, 83 London Wall; and Pan Pacific Hotel, 80 Houndsditch.
685. For St Botolph's Church – Church Hall, the effect on sunlight amenity is defined as Major Adverse (Significant) and for St Botolph's without Bishopsgate the effect on sunlight amenity is defined as Moderate Adverse (Significant). Given that these sunlight alterations are beyond the BRE Guidelines, they are therefore assessed in greater detail.

#### St Botolph's Church – Church Hall

686. Two rooms within the property including the church hall and kitchen that are served by 14 site-facing windows have been assessed. The kitchen has been assessed to experience APSH alterations which are considered to be Negligible

and therefore the effects on this room are Not Significant. The church hall will experience reductions that are considered to be Major Adverse (Significant). The room is served by 11 windows, 7 of which will experience APSH alterations that meet the BRE recommendations. Accordingly, 61% of the windows serving this room will be in line with the BRE recommendations.

687. The room receives 0% APSH for winter hours and therefore alterations in winter would be negligible and not material. Over 70% of all windows serving this property will not experience any significant alterations in terms of both winter and annual hours. The church hall is not occupied on a permanent basis, and it appears from online searches undertaken by the applicant's consultant to be used for dinners/evening events. With this not being a residential building, the effects are considered to be acceptable.

#### St Botolph's without Bishopsgate

688. A total of 52 Site-facing windows serving 7 rooms have been assessed in terms of daylight reductions, 3 rooms served by 40 windows have been assessed in terms of sunlight alterations. Of 3 rooms, 2 rooms will meet the BRE guidelines in terms of sunlight reductions, therefore these effects are considered to be Negligible and Not Significant. The remaining room (R1/120) which is a vestry will experience APSH alterations that are considered to be Moderate Adverse.
689. This room will not experience any reductions in winter hours, and the reductions in annual APSH are slightly beyond the target of being categorised as minor adverse (by 0.4%). In addition, this room will retain 16% of annual APSH. This is considered to be an acceptable level of sunlight given the urban environment, the non-residential use and that the room is not considered to be in a use where loss of sunlight will have a materially detrimental effect..
690. Overall, whilst the percentage reductions show that this property experiences up to Moderate Adverse sunlight alterations to 1 room that are Significant, the overall effects are considered to be acceptable due to the rooms being impacted are vestries, not the main nave, transept or chancel areas to the church. The remaining rooms are well within the BRE recommendations or by exceeding this target by only 3% to be categorised as minor adverse, but still not significant.

#### Cumulative Impact

691. A total of 1,047 windows across 9 properties were assessed for daylight. For VSC a total of 21 windows would see losses greater than recommended in BRE Guidelines and would experience a reduction of 20% or more. In particular at St Botolph's Church – Church Hall, St Botolph without Bishopsgate Church and All Hallows Church London Wall. However, two additional windows in St

Botolph's without Bishopsgate would experience losses and additional effects, however the conclusions reached would be the same as discussed above.

692. A total of 71 rooms were assessed for daylight. For NSL a total of 2 rooms would see losses greater than recommended in BRE Guidelines and would experience a reduction of 30% or more at St Botolph without Bishopsgate Church, however this was also discussed above.
693. Additional losses are prevalent at All Hallows Church and of the 4 windows assessed, 2 would not meet BRE Guidance with one window now experiencing a loss of 30% which was not identified in the completed development assessment. This window will experience VSC alterations that are considered Moderate Adverse, therefore are considered to be Significant. However, this window will experience reductions 1.12% above the target of being considered Minor Adverse and Not Significant. Additionally, this room is served by another window which meets BRE Guidance. The average reduction to this room is approximately 15%.

#### St Botolph's without Bishopsgate Church

694. For Sunlight, St Botolph's without Bishopsgate Church will experience some additional effects as a result of the cumulative schemes. Of 3 rooms, 2 rooms will experience sunlight reductions up to 25.7%, therefore these effects are not considered to be not significant. The remaining 1 room will experience APSH alterations that are considered to be Moderate Adverse and Significant. As above, room R1/120 is understood to be a vestry under the organ room and will experience APSH reductions of 33.3%. Therefore, the alterations are considered to be Moderate Adverse and Significant. The room will not experience any reductions in terms of winter hours and it will retain 14% of annual hours. This is considered to be an acceptable level of sunlight given the urban environment, the non-residential use and that the room is not considered to be in a use where loss of sunlight will have a materially detrimental effect.
695. Overall the daylight and sunlight available will be sufficient and appropriate to context and would not be reduced to unacceptable levels, and acceptable living standards would be maintained. As such, the overall impact (including the degree and extent of harm) is not considered to be such that it would conflict with, London Plan policy D6, Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.

#### Sunlight in Amenity Spaces

696. The potential impacts of the proposed development on the sunlight availability on surrounding amenity areas has been assessed against the baseline scenario.

697. The impacts of the proposed development has been assessed on 3 surrounding amenity areas including:
- Tennis/ Netball Court;
  - Public Spaces with Seating;
  - Private Memorial Garden Area
698. In terms of overshadowing, for the completed scheme, the Sun on Ground assessments show that these amenity spaces assessed will not experience any reductions of levels of sunlight above those suggested by the BRE guidelines on the 21st of March, as they receive 2 hours of direct sunlight to 0% of their areas. Therefore, these effects can be classified as Negligible and Not Significant. When assessed on the 21st of June, all 3 amenity spaces will receive 2 hours of direct sunlight to at least 60% of their area which is well within the BRE guidelines criteria.
699. Time in Sun images illustrate that on the 21st of March, the Tennis Court will not see any notable alterations. Private Memorial Garden will experience an additional 30min of shadow to approximately 20% of its area. The remaining 2 spaces will see an additional 30min of shadow to 50% of their area on the 21st of March. These effects can be therefore considered Negligible or, at worst, Minor Adverse which are Not Significant.
700. The Tennis/Netball Court will see an additional 30 min of shadow to approximately half of its area. The 2 remaining amenity spaces (Bishopsgate Churchyard and Private Memorial Area) will experience an additional shadow of up to 30min to their entire areas on the 21st of June. The overall effects of the Proposed Development in terms of overshadowing, therefore, are considered to be Negligible.

#### Cumulative Impact

701. The Sun on Ground assessments show that this amenity space assessed will not experience any reductions of levels of sunlight above those suggested by the BRE guidelines on the 21st of March, as it receives 2 hours of direct sunlight to 0% of its area in the existing condition. Therefore, these effects can be classified as Negligible and Not Significant. When assessed on the 21st of June, this amenity space will receive 2 hours of direct sunlight to at least 93% of their area which is well within the BRE guidelines criteria.
702. Time in Sun images illustrate that on the 21st of March, the amenity space assessed will experience an additional 30min of shadow to approximately 50% of its area. These effects can be therefore considered Negligible or at worst Minor Adverse and Not Significant.

703. Due to the location of the Cumulative Schemes in Tier 1 in relation to the Site, it is not necessary to run separate assessments for 55 Bishopsgate, as the scheme will not interact with the Tier 1 Cumulative Schemes as it is located too far south. Therefore 55 Bishopsgate will not affect any cumulative effects caused to or by the Tier 1 Cumulative Schemes (1-27 The Arcade, Liverpool Street or 1-14 Liverpool Street and 11-12 Blomfield Street).

#### Transient Overshadowing

704. At the Spring Equinox, the shadow is cast from the existing development to these amenity spaces after 15:00GMT. These amenity spaces are overshadowed by a shadow cast from the existing property from 15:00GMT to 17:00GMT.
705. At the Summer Solstice, the shadow is cast from the existing property to the south-west from 15:00GMT. There is no significant overshadowing caused by the existing development to these 3 amenity spaces until 15:00GMT. There is some overshadowing to Tennis Court and Private Memorial Garden Area from 15:00GMT to 17:00GMT.
706. In conclusion, the results show that there would be no material overshadowing effects caused by the development to any public amenity area and therefore the proposal complies with, policy D6 of the London Plan, DM10.7 of the Local Plan and DE8 of the emerging City Plan.

#### Solar Glare

707. Five assessment point 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.
708. The calendar graphs show that any glare that is likely to occur will be very small and unlikely to cause a significant effect. The effects would therefore be considered Not Significant.
709. 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.

### Third Party Review

710. A third party review was commissioned to undertake a non-technical review of the Daylight and Sunlight assessment submitted.

St. Botolph's Church - Church Hall

711. Notwithstanding the sensitivity of the church hall, the effect upon the daylight within the church hall, when considering the use and VSC, NSL, APSH and radiance analysis will be of minor significance. The losses of sunlight are isolated to north facing windows only, and we therefore agree with the conclusions that the impacts could be consider acceptable.

712. St. Botolph without Bishopsgate Church

713. The overall effect upon the daylight and sunlight within the church is off minor significant when considering VSC, NSL, APSH and radiance analysis.

Church of All Hallows, 83 London Wall

714. Whist 1 window experiences a VSC loss of potentially moderate significance, it is felt that the overall impact can be considered acceptable by virtue of the second window serving the room experiencing an unnoticeable change in VSC, and, subsequently, in NSL. In conjunction with the BRE adherent changes in APSH and the non-residential use of the building. It is agreed that the impacts can be considered acceptable.

Overshadowing

715. The overall effects of the proposed development in terms of overshadowing, has been considered negligible. It is agreed that the effect is negligible.

Solar Glare

716. The application submission states that “whilst some glare occurs within an angle of 3° to 30°, (which in accordance with Table 10.5 could be considered to be a medium magnitude of effect), the amount of time that the glare could occur for on any one day, the time of day it occurs at, as well the number of occurrences across the year are not considered to lead to same level of significance. We have therefore reached a conclusion with a lower overall significance of effect than that shown at Table 10.9 and classified the effects Minor Adverse or Negligible”. Following review, the comments on solar glare and the analysis in the appendix of the ES chapter and they align and as such they were content with the conclusion an explanation provided.

## Thermal Comfort Assessment

717. London Plan Policies 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.
718. 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.
719. 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:
720. Five configurations have been assessed including the following:
- Configuration 1: Existing Site with Existing Surrounding Buildings;
  - Configuration 2: Proposed Development with Existing Surrounding Buildings;
  - Configuration 3: Proposed Development with Cumulative Surrounding Buildings;
  - Configuration 4: Proposed Development with Existing and Proposed Landscaping, Wind Mitigation Measures and Existing Surrounding Buildings; and
  - Configuration 5: Proposed Development with Existing and Proposed Landscaping, Wind Mitigation Measures and Cumulative Surrounding Buildings.



| 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<br>AND<br>≥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<br>AND<br>≥25% winter         | Appropriate for short duration and/or infrequent sedentary uses during most of the year.                                 | Orange |
| Transient           | <25% in winter<br>OR<br><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    |

721. Thermal comfort directly relates to the amenity of external spaces around the site and is therefore an important parameter for public space planning and design. The predicted thermal comfort frequencies have been presented in line with the City of London Thermal Comfort Guidelines. It is noted that visual aspects of public space design are very subjective and have not been considered in this study.
722. When the Proposed Development is built out (Configuration 2), the majority of the areas at and around the Proposed Development were predicted to have all-season and seasonal thermal comfort conditions. Areas with short-term and short-term seasonal thermal comfort conditions were appropriate for thoroughfares on nearby pavements and cycle users using the carriageways. Amenity spaces with short-term conditions are associated with increased windiness during the winter months. These areas were predicted to have acceptable thermal comfort conditions during the summer season. Thermal comfort conditions predicted for off-Site terrace spaces were consistent with Configuration 1.
723. With the cumulative schemes in situ (Configuration 3), the simulations predicted that there would not be a significant change in outdoor thermal comfort compared to Configuration 2.
724. Inclusion of the proposed landscaping and the wind mitigation measures (Configurations 4 and 5) were predicted to improve the extent of all-season thermal comfort conditions closer to the north-east corner of the Proposed Development and to the west of Dashwood House. Inclusion of terrace level

wind mitigation measures improved the thermal comfort conditions predicted on the upper-level private terraces at the south-west corner and the level 19 and 20 terrace spaces.

725. The simulations indicated that thermal comfort conditions around the Proposed Development are suitable for the intended uses.

#### Thermal Comfort Conclusion

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

#### Light Pollution

727. 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.
728. Potential light pollution impacts arising from the proposed development have been assessed in neighbouring buildings across the road along Old Broad Street and west of the proposed development on Wormwood Street. These areas have been identified as sensitive to the impacts of light pollution in accordance with Institute of Lighting Practitioners (ILP) Guidance.
729. The assessment demonstrates that on the face of the building along Old Broad Street there will be an average of 10 lux of light emanating from the proposed public realm lighting when at full output. This level is significantly below the pre-curfew recommendation of the ILP.
730. Post-curfew, the lighting around the Pod and uplighting to the timber canopy would be dimmed down to 50% to ensure that there is no more than 5 lux light trespass into the neighbouring property in accordance with the ILP recommendation.
731. Finally, the assessment indicates that on the face of the building along the East on Wormwood Street there will be an average of 1 lux of light emanating from the proposed public realm lighting when at full output. This level is significantly below the pre-curfew and the post-curfew recommendation of the ILP.
732. All of the neighbouring sensitive receptors are shown to experience levels of light trespass well within the guideline values for both the pre and post curfew assessment.

733. 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.
734. The development would comply with the Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9 and has been designed as to avoid light spill.

#### Air Quality

735. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 2036 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all development to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI of the London Plan.
736. The Environmental Statement (Chapter 8) 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.
737. 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.
738. The BREEAM Pre-assessment demonstrates that the scheme is 'Excellent' in the Pollution category.
739. Overall, the proposed development would have a non-significant effect on air quality, during both the construction and operational phases. The proposed development would be Air Quality Neutral and meets the Air Quality Neutral benchmarks for both building and transport emissions assessment.
740. The City's Air Quality Officer has no objections and recommends conditions in relation to installation of generators, Non- Road Mobile Machinery Register

details and a compliance condition in relation to flues terminating at least 1m above the highest roof in the development.

741. Subject to conditions, the proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2036, and policy SI of London Plan which all seek to improve air quality.

#### Noise and Vibration

742. 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.
743. 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.
744. 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) noise effect is likely to occur at 25-26 Wormwood Street during demolition. A Moderate Adverse (significant) noise effect is also expected on 69 Old Broad Street during demolition. During piling works, Major Adverse (significant) noise effects are expected on 25-26 Wormwood Street and 5-24 Wormwood St, with Moderate Adverse (significant) noise effects expected on 35 New Broad St and 69 Old Broad St. 69 Old Broad Street is also expected to experience Moderate Adverse (significant) noise effects during the substructure and superstructure works respectively. All other properties assessed are considered to experience Minor Adverse or Negligible (not significant) temporary noise effects.
745. 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.
746. 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.

747. 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.
748. 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.
749. The submitted EIA indicates that the requirements of these conditions can be satisfactorily met and consequently the proposals would comply with London Plan policy D13, Local Plan policy DM15.7 and draft City Plan 2036 policy HL3.

#### Health Impact Assessment

750. 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.
751. 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.
752. There are several residential units in close proximity to the site including 25-26 Wormwood Street directly adjacent to the Site, 5-24 Wormwood Street approximately 15 metres from the Site and at 80 Houndsditch approximately 100 metres from the site. The HIA addresses potential disturbance from construction noise for the residential units at Bull's Head Passage and states that the Dust Management Plan and Construction Environmental Management Plan will enable mitigation of disturbance.
753. 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:
- Creation of high-quality buildings applying inclusive design principles that meet Building Regulations to create a development that is suitable for and accessible to a wide range of users;

- Consideration to design elements to support creation of safe and welcoming buildings;
- Car-free development that encourages and promotes active travel (walking and cycling);
- Provision of extensive, high-quality public realm including new pedestrian routes creating links to the local area and integrating the proposals in the neighbourhood;
- Provision of cycle facilities providing cycle parking, showers and lockers to encourage sustainable travel options and supporting active building principles;
- Provision of enhanced public realm - placemaking initiatives which help to shape a welcoming cultural and social environment supporting social cohesion among workers and visitors, encouraging interaction and movement;
- Enhanced biodiversity through provision of new public realm and greening across proposed terraces and incorporating biophilia principles;
- The provision of new jobs associated with the construction phase in addition to the proposed commercial, supporting access to local employment;
- Provision of cultural spaces supporting local community events and supporting social cohesion;
- Provision of affordable workspace - the proposed Creative Incubator Space will support local artists and creatives by facilitating greater collaboration and offering affordable workspace at reduced market rent; and,
- Promotion of skills and training through construction programme and partnerships with local community (including local schools).

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

- Noise effects at nearby residential receptors on Wormwood Street arising from demolition and piling activities. The noise arising from these activities could lead to indirect health effects arising from disruption and disturbance. This could range from annoyance to potential mental health issues including stress-related illness and disturbances in sleep (although construction activities, particularly noisy activities, will be controlled to specific hours of operation). The noise effects would be temporary, concluding once works are completed. The assessment as set out above considers health effects at a general population level however, when exposed to the same health pathway, different individuals may react differently as a result of a complex mixture of underlying health issues, lifestyle factors and personal preferences. Therefore, the potential health effects on nearby residents could result in an associated health impact but it is not considered this would result in a significant health impact.

755. Potential negative impacts identified in the Assessment would be mitigated so far as possible by the requirements of relevant conditions and S106 obligations. The development seeks to improve the health and addresses health inequalities, the residual impact would be acceptable, and the proposals would comply with London Plan policy GG3 and draft City Plan 2036 policy S1.

## **Sustainability**

### Circular Economy

756. 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.
757. The application includes considerations as to whether there is an opportunity to retain and refurbish the building or building elements currently on site.
758. The existing development was completed in the 1970s and shares an interconnected basement with Dashwood House to the northeast of the site. On average, typical upper floors of the 11-storey element have structural floor to floor heights of 3.59m. Following the IRA bomb damage in 1993, the curtain wall façade was replaced and the building was repaired in 1994.
759. A pre-demolition and materials audit has been undertaken and 4 options were considered as part of the pre-redevelopment audit:
- Light touch refurbishment with new core and up to 3 additional storey upward extension  
Retained: 100% substructure, 67% superstructure, 79% facades (all and subsequent structure retention percentages measured by volume, facades based on square meter)  
This option would not achieve a full energy efficiency upgrade and high quality office floorspace.
  - Intensive refurbishment, partially retaining existing and transferring new stories over using deep transfer trusses  
Retained: 83% substructure, 48% superstructure, 10% facades  
This option would retain the majority of the structure but require embodied carbon intensive transfer structures to transmit the loads to new piled foundations in order to facilitate the level of extension. The floor to floor heights of the retained floors would constrain the horizontal distribution of building services and the use of simple and efficient HVAC systems, in addition to limiting the adaptability and flexibility of the floorspace.



- Full redevelopment, including full demolition and new basement  
Retained: 0%  
This option would not address opportunities of circular economy and lead to the highest embodied carbon impacts, and therefore was discarded at an early stage.
- Balanced approach, retention of existing basement where possible and partial retention of 65 Old Broad Street  
Retained: 62% substructure, 25% superstructure, 10% facades

760. This option would partially retain structure and include a new build element at 55 Old Broad Street which would provide adaptable and flexible office floorspaces and efficient MEP systems.

761. The applicants consider option 4 to represent the best balance between retention of building elements, reducing embodied carbon emissions, incorporating the range of circularity principles and achieving benefits relating to public realm, urban greening, energy efficiency and health and wellbeing.

762. Overall, the analysis of the options with regard to circular economy demonstrates that the retention of higher percentages of existing fabric would result in lower quality office accommodation on the retained floors, including limited future flexibility and adaptability. With regard to carbon intensity, options 1 and 2 would have poorer operational energy performances and, in relation to option 2, high carbon intensity to strengthen the structure for an extension that maximises the proposed floorspace to full capacity on the site. The application includes an exemplar assessment of how the deconstruction material resulting from the preferred option 4 could be reused at highest values. This forms a substantial basis for improving the material reuse opportunities at later project stages, and the confirmation of details will be required through a condition.

The application proposal:

763. 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.

764. A pre-redevelopment audit, a pre-demolition audit and a materials audit have been submitted. The circular economy strategy includes details to support reuse and recycling of existing materials within the new built elements as well as durable materials and construction and sustainable procurement, to include:

- maximum the retention of the basement structure (62%) and the majority of 65 Old Broad Street's superstructure (25%) and façade (10%)

- identification of existing materials and their opportunities for recovery, reuse and recycling, including 3% of the facades and 13% of the terrace soffits reused
- identification of waste minimisation measures, such as through prefabricated elements and the use of take back schemes
- new built elements with durable materials, generous floor to ceiling heights and robust construction to enable flexibility and adaptability to future changes of use and climate change
- accessibility of building elements for maintenance and replacement and self-finished materials and mechanical connections for ease of disassembly
- targeting high recycled contents for new materials of overall 25%.

765. An update to the 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 are required by condition.

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

766. The Energy Statement accompanying the planning application provides separate figures for the new development at 55 Old Broad Street (OBS) and the refurbished building at 65 OBS. The strategy demonstrates that 55 OBS has been designed to achieve an overall 2% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building, and 65 OBS would achieve a 84% reduction compared to its current performance (in accordance with Part L 2021). For the new building at 55 OBS, this compares to an over 46% reduction beyond Part L 2013 and for 65 OBS 73% of carbon emissions could be saved which demonstrates that the development is designed to achieve an operational carbon emissions reduction similar to the level of other City office developments approved in recent years.

767. Energy demand and the risk of overheating would be reduced by including the following design measures:

- optimised glazing to solid ratio including external shading ration to maximise of daylight penetration while balancing solar gains and heat losses
- minimising heat losses through highly insulated and airtight envelope
- providing thermal mass for passive regulation of the internal temperature through exposed concrete soffits
- reducing cooling loads through manually operable windows as part of a mixed mode ventilation system provided by on-floor air handling units (AHUs)
- efficient heating and cooling system through underfloor ventilation and perimeter trench

- additional active cooling provided by high efficiency air source heat pumps
  - efficient Variable Refrigerant Flow system (VRF) with potential for hybrid VRF in the refurbished element
  - centralised Waste Water Heat Recovery (WWHR) in 55 OBS to pre-heat water for the showers from shower waste water
  - efficient LED lighting throughout with 3.5W/m<sup>2</sup> targeted in office spaces.
768. The strategy would not reduce the new building's operational carbon performance beyond Part L 2021, due to the expected efficiency of the proposed heating, ventilation and air conditioning (HVAC) system not being accounted for in the Part L 2021 modelling methodology. The proposed system combines an underfloor air distribution system with perimeter trench heating and cooling. The underfloor air distribution brings various benefits such as exposure to concrete ceiling slabs to provide thermal mass, increased flexibility for tenants by ease of subdivision and partitioning, minimised upfront and whole life-cycle carbon emissions through avoiding more complex MEP installations and reduced cooling demand. This underfloor system is only feasible in buildings with reduced internal energy loads, and it has been chosen for its embodied carbon reduction opportunities while the actual energy performance would not differ from other HVAC systems.
769. With regard to 65 OBS, the strategy would reduce the refurbished building's operational carbon emissions by 80% compared to a Building Regulations 2021 compliant refurbishment.
770. There is currently no available district heating network close enough to the site, however, the energy network provider Citigen has indicated a planned extension of its current network into the area of the site, and the opportunity to connect into a future district heating network would be incorporated into the basement of the proposed development.
771. In relation to low and renewable energy technologies, a system of air source heat pumps and water source heat pumps, mostly located at level 23, and rooftop mounted PVs above level 23 of 55 OBS and on levels 5 and 6 of 65 OBS would provide low carbon and renewable energy, reducing the operational carbon emissions by 6% for No 55 and by 3% for No 65 OBS compared to a Building Regulations 2021 compliant building. The PV systems are anticipated to provide 4% of the proposed development's regulated energy demand.

#### Energy Use Intensity (EUI)

772. 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/m<sup>2</sup>(GIA)/year

and a space heating demand of 15 kWh/m<sup>2</sup>(GIA)/year. The estimated EUI from the proposed development at No 55 OBS is 93.39 kWh/m<sup>2</sup>/year and for the space heating demand 8.86 kWh/m<sup>2</sup>/year. No 55 OBS's estimated EUI is 157.63 kWh/m<sup>2</sup>(GIA)/year and the space heating demand is 61.61 kWh/m<sup>2</sup>/year. These are conservative estimates at this stage, and the energy consumption is anticipated to decrease with further design and modelling detail and, at in use stage, in collaboration with tenants, monitoring and optimisation.

773. 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.”
774. 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**

775. A BREEAM New Construction 2018 pre-assessment for 55 OBS and a BREEAM Refurbishment and Fit-Out 2014 pre-assessment for 65 OBS have been prepared, targeting “excellent” ratings for both. 55 OBS currently would achieve 79.35% (equivalent to an “excellent” rating) with a potential of further 11.93 % to achieve the “outstanding” rating. The pre-assessments are 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.
776. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2036 Policy DE1. Post construction BREEAM assessments are required by condition.

### **NABERS UK**

777. This certification scheme rates the energy efficiency of a commercial building from 1 to 6 stars over a period of 12 months of operation. When signing up to this scheme, applicants commit to achieve target rating, in this case a 5 star

rating (out of 6 possible) which will contribute to reducing common performance gaps between modelled and actual energy use intensity.

### **Whole life-cycle carbon emissions**

778. 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:

779. The carbon options appraisal has been undertaken in line with the City of London's Carbon Options Guidance planning advice note (2023). 4 options have been assessed:

- Light touch refurbishment with new core and up to 3 additional storey upward extension  
Retained: 100% substructure, 67% superstructure, 79% facades
- Intensive refurbishment, partially retaining existing and transferring new stories over using deep transfer trusses  
Retained: 83% substructure, 48% superstructure, 10% facades
- Full redevelopment, including full demolition and new basement  
Retained: 0%
- Balanced approach, retention of existing basement where possible and partial retention of 65 Old Broad Street  
Retained: 62% substructure, 25% superstructure, 10% facades.

780. The quantitative assessment of the whole life-cycle carbon emissions of these 4 scenarios for the site is summarised in the table below:

| Options appraisal summary                      | Light touch refurbishment - extension  | Intensive refurbishment - extension   | Full redevelopment  | Balanced approach   |
|--|--|---|---|---|
|  | <p>Retained:<br/>100% Substructure<br/>67% Superstructure<br/>79% Facade</p> | <p>Retained:<br/>83% Substructure<br/>48% Superstructure<br/>10% Facade</p> | <p>Retained:<br/>0% Substructure<br/>0% Superstructure<br/>0% Facade</p>  | <p>Retained:<br/>62% Substructure<br/>25% Superstructure<br/>10% Facade</p> |
|  | Option 1   | Option 2  | Option 3  | Option 4  |
| GIA  | 21,175m <sup>2</sup>   | 39,158m <sup>2</sup>  | 39,488m <sup>2</sup>  | 39,488m <sup>2</sup>  |
| Upfront embodied carbon (A1-A5)                | 340 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                   | 580 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                  | 590 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                | 562 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                  |
| % Substructure retained relative to existing   | 100% by volume   | 83% by volume   | 0% by volume  | 62% by volume   |
| % Superstructure retained relative to existing | 67% by volume  | 48% by volume   | 0% by volume  | 25% by volume   |
| % Facade retained relative to existing         | 79% by area  | 10% by area   | 0% by area  | 10% by area   |
| Life-cycle embodied Carbon [A-C(exc.B6-B7)]    | 655 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                   | 895 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                  | 882 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                | 839 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                  |
| Operational Energy (B6) (60 years)             | 698 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                   | 361 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                  | 361 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                | 361 kgCO <sub>2</sub> e/m <sup>2</sup> GIA                                  |
| Total WLCA [A-C(exc.B7)] (60 years)            | 1,355 kgCO <sub>2</sub> e/m <sup>2</sup> GIA<br>28,695 tCO <sub>2</sub> e    | 1,265 kgCO <sub>2</sub> e/m <sup>2</sup> GIA<br>49,533 tCO <sub>2</sub> e   | 1,266 kgCO <sub>2</sub> e/m <sup>2</sup> GIA<br>50,010 tCO <sub>2</sub> e | 1,218 kgCO <sub>2</sub> e/m <sup>2</sup> GIA<br>48,103 tCO <sub>2</sub> e   |

781. As expected, the light touch refurbishment option 1 results in the lowest embodied carbon intensity in absolute terms while the full redevelopment option 3 would result in the highest embodied carbon emissions. The light touch refurbishment option 1 would have the highest carbon intensity per square meter while the balanced approach option 4 would have the lowest. Based on closely matching proposed floorspace, the intensive refurbishment option 2 would result in higher absolute and per square meter carbon emissions compared to option 4 with a smaller percentage of retained building elements, due to the complex structural strengthening works and the use of higher embodied carbon steel framed floors required for an extension.

782. In terms of operational carbon impacts, option 1's emissions would almost double those of the other options, therefore resulting in the highest whole life-cycle carbon emissions per square meter while the balanced approach option



4 would result in the lowest whole life-cycle carbon impact per square metre. When considering the absolute whole life-cycle carbon emissions, option 1, due to its much lower floorspace figure (21,175 sqm GIA), would be the lowest carbon option. Option 4 would be the lowest carbon option of the 3 options with a high proposed floorspace uplift (GIA), however, the embodied carbon intensity of the balanced approach would be considerably lower than the intensive refurbishment option and the full redevelopment option.

783. Option 1 would not be able to facilitate the transformation of the building into a high quality, energy efficient office development with public realm benefits. Option 2 would retain the majority of the existing structure but overall, both per square meter and in absolute terms, would result in higher whole life-cycle carbon emissions than option 4, and these would only be marginally lower than option 3 (full redevelopment).
784. While the provision of additional floorspace and the opportunities to create a climate resilient and healthy development with added urban greening and biodiversity would be broadly similar between options 2, 3 and 4, there would be remaining quality constraints due to reduced clear floor to ceiling heights in the intensive refurbishment and extension option 2. Given that option 4 would offer the best whole life-cycle carbon balance, the balanced approach option 4 has been further developed for the application scheme.
785. The options assessment was subject to a review by a 3rd party sustainability consultant which concluded that the optioneering assessment and evaluation have been carried out in compliance with the Carbon Options Guidance 2023.

The application proposal:

786. 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, reaching close to the Aspirational Benchmark.
787. The following carbon reduction measures have been incorporated into the proposal:
- targeting ASHP units at 55 OBS where no refrigerant is managed on site, avoiding leakage. At 65 OBS, minimising the risk of leakage of the system that requires managing on site
  - minimising those elements/materials affected by frequent replacement cycles, such as main facade pre-cast pre-glazed modules with sensible



glazing ratios and easy replacement, masonry back of house (BOH) partitions that do not need to be replaced

- 55 OBS offices with underfloor HVAC (heat, ventilation, air conditioning) system requiring fewer units and less frequent maintenance/repairs and easy access when compared to a typical fan coil unit system typically applied in offices in the UK
- 55 OBS east demountable louvred facade enclosing the on-floor plant room to enable easy replacement of plant room equipment
- self-finished materials to reduce replacement of finishes
- minimising suspended ceilings
- reducing end of life emissions through, for example, using cross laminated timber (CLT) slabs with a bolted system to aid disassembly, standard structural steel sections with bolted connections where feasible, raised access floor and suspended ceiling (where proposed) with standard measurements, and prioritising manufacturers with take-back schemes.

788. 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                    | 714                    | < 950     | GLA Standard     |
|                          |                        | < 600     | GLA Aspirational |
| A-C<br>(excluding B6-B7) | 1,071                  | < 1400    | GLA Standard     |
|                          |                        | < 970     | GLA Aspirational |
| B6-B7                    | 627                    |           |                  |
| A-C<br>(including B6-B7) | 1,698                  |           |                  |

789. These figures would result in overall whole life-cycle carbon emissions of 68,907,405 kgCO2 being emitted over a 60-year period. Of this figure, the operational carbon emissions would account for 25,434,917 kgCO2 (37% of the building's whole life-cycle), and the embodied carbon emissions for 43,472,488 kgCO2, (63% of the building's whole life-cycle carbon).

790. 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.

#### Urban Greening

791. London Plan Policy G5 (Urban Greening) sets out the requirement for major developments to contribute to the greening of London through urban greening as part of the design and site. An Urban Greening Factor of 0.3 is recommended for non-residential developments. Draft City Plan (2036) Policy OS2 (City Greening) mirrors these requirements and requires the highest levels of greening in line with good design and site context. The proposed development would incorporate significant public realm areas and landscaping at street level and higher up the building in the form of new terraced areas. The glasshouse office reception and lobby space will also be extensively greened, albeit as internal space this does not contribute to the Urban Greening Factor (UGF) score achieved for the application site.
792. Across the entire application site, the development achieves an Urban Greening Factor (UGF) of 0.43 which exceeds the 0.3 target and is policy compliant.
793. As a result of including the landscape design for the level 19 terrace, and increased planters at ground floor since submission, the UGF score is now up to 0.43 from 0.311 as referenced in the original submitted material. The differences in the scores are accounted for by areas of blue roof, additional tree planting and improved extent and specification for living roofs and repetition in balcony planting areas across 19 floors.
794. The details of the proposed planting, landscaping and blue roof would be secured by condition, which would include a maintenance plan and irrigation details. As such the proposed development complies with London Policy G5.

#### Biodiversity Net Gain

795. The proposed development has a strong focus on inclusion of urban greening with strategic green infrastructure and improvements to the public realm around 55 and 65 Old Broad Street which is welcomed.
796. 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 hardstanding, building, introduced scrubs and urban tree.

797. 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 0.55 relative to the existing site in line with the ecological enhancements.

### Overheating

798. In order to mitigate against hazards such as risk of thermal expansion and contraction, the proposed development incorporates the use of movement joints and façade detailing which allows increased movement for a greater thermal range.
799. In relation to thermal comfort and health and safety of building occupants, the proposed development would have HVAC design, easy replacement for cooling generation, façade design coordinated with FPA providing adequate solar protection and would utilise shading or glazing specifications. For business continuity, there is a focus on passive design to reduce future heat stress, thermal massing to reduce by night purging, shading on all aspects excluding the north elevation and natural ventilation.
800. To address the urban heat island design, the proposed development would incorporate use of reflective materials and green roofs. The proposed building would provide public realm shading reducing pedestrian discomfort aligning with Cool Street and Greening programme.

### Flooding

801. The application site is located in Flood Zone 1 and therefore has a low likelihood (less than 0.1% annual probability) to be affected by flooding due to river and tidal. To reduce risk and impact of basement flooding a non-return valve and double sealed manhole covers in place with BMS system if pump out fails. The proposed development will reduce run-off rates by using surface water attenuation tanks and blue/green roofs which will attenuate rain, in high rainfall events. The impact of storms, and high winds have been considered in the building's façade design and external element, accounting for excessive loads being applied to structure or secondary elements.

### Water Stress

802. The proposed development will incorporate potable water reduction measures including low flow fixtures and greywater harvesting where feasible. Potable water storage will be provided to ensure supply continues during disruption. It is noted that risk of subsidence from drought has been identified. The proposed

design strategy utilises deep piled foundations to reduce risk of subsidence. The existing basement already has deep foundations beyond the zone of London Clay shrink swell vulnerability.

### **Conclusion on Sustainability**

803. 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.
804. The proposed development would deliver a high quality, energy efficient development that commits to a high 5\* NABERS UK rating and is on track to achieve an “excellent” BREEAM assessment rating, in compliance with London Plan policy SI 2, Local Plan policy CS15 as well as Draft City Plan 2036 policy DE1. 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. The proposed energy efficiency and MEP strategy would perform highly, both in terms of operational and embodied carbon efficiency and represents a long life, loose fit solution for a large commercial development in the City.
805. The assessment of options, carried out in compliance with the Carbon Options Guidance 2023, confirmed that the preferred proposal would result in the lowest whole life-cycle carbon emissions out of the 3 options that would achieve the proposed high quality and floorspace uplift. This option has been further developed to achieve a low embodied carbon level close to the GLA’s Aspirational Benchmark. A detailed study of the opportunities of the deconstruction material for reuse forms a substantial basis for the identified circular economy opportunities, coupled with a strategy to achieve maximum flexibility, adaptability and material optimisation to satisfy the GLA’s circular economy principles and London Plan policy SI 7, Local Plan policy CS15 and DM17.2, and Draft City Plan 2036 policy CE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and various opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1,

DM18.2, CS19, DM19.2, and Draft City Plan 2036 polices S14, OS1, OS2, OS3, S15, CR1, CR3.

## **Security**

806. The security proposals to protect the building and new areas of public realm have been development in consultation with the Designing out crime and the counter terrorism security officers within the City of London Police at pre-application stage.
807. The site would be protected by HVM bollards located at the building entrances at ground floor level on the west and south facing elevations. The bollards would be automated at these vehicle entrances to enable vehicles to access the building. These would be on private land within the site.
808. From a security perspective the development will be designed as such that the accessibility of terraces and rooftop areas will only be accessible to tenants and their authorised visitors. The access control strategy will be a layered approach through the deployment of initial secure checkpoints i.e. security turnstiles and vertical transportation with access control technology present. Subsequent layers will be tenant floorplate access control provision and lockable doors on all terraced and rooftop access. Accessibility to the general public will be restricted to ground floor semi-public access such as reception lobbies only.
809. The development will also be designed as such that specific video surveillance devices will be deployed for highlighted risk areas and where appropriate additional layered technologies i.e. video analytics. All secure lines and external access within the base build will be also covered by video surveillance.
810. Further details of the overall security strategy will be required by condition and a Visitor Management Plan will be required by S106 which will detail more specifically the measures to protect the building within the development scheme and its different user groups.
811. 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**

812. 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.

813. 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.
814. There are several locations across the application site where building users or visitors will be able to access an external space 10m above ground level:
- 65 Old Broad Street
    - Level 2 terrace
  - 55 Old Broad Street
    - Balconies at levels 3-22
    - Communal terrace at level 19
    - Private terraces at levels 20 and 21
815. As suggested in the Planning Advice Note, all of these areas have been designed with perimeter planting as a deterrent to accessing the edge of the building, and have balustrades of 1.4m high.

### **Fire Statement**

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

### **Assessment of Public benefits and the paragraph 202 NPPF balancing exercise**

817. 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".
818. Public benefits may flow 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.

819. In this case, the slight less than substantial harm is identified in relation to:
- St Paul's Cathedral in LVMF River Prospects 15B.1 from Waterloo Bridge (downstream).
820. Paragraph 202 requires this harm be weighed against the wider public benefits of the proposal including, where appropriate, securing optimum viable use.
821. The key social, environmental and economic public benefits of the proposal are considered to be:
822. Economic:
- The provision of 33,078sqm (GIA) of Grade A office floorspace which will contribute to 5.7% of the overall projected office floorspace requirements for the City delivering an estimated net increase off 1,990 to 2,625 Full Time Equivalent (FTE) jobs and 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.
  - Flexible and publicly accessible cultural uses/event floor space comprising of 320sqm (GIA) in the restored Bath House and 31sqm (GIA) at Level 2 of 65 Old Broad Street 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 provision of 668sqm (GIA) of office/maker/studio floorspace at Levels 3 and 4 of 65 Old Broad Street with 25 co-working desks available at affordable, discounted market rent levels at no more than 70% market. Other desks in this space would be available to general users, though with a cap on organisations taking no more than 5, to ensure the space remains tailored to SMEs, start-ups and creatives. The inclusive offer which will



attract smaller and more diverse businesses including SMEs to the City Cluster.

- Provision of 112 sqm of affordable retail (available at discounted market rent, no more than 70% of market rent) at Level 1 of 65 Old Broad Street.
- 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.

823. Collectively these are attributed **Substantial** weight.

824. Environmental:

- 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 heritage appreciation of the Grade II Listed Bath House by allowing public access, 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 of Old Broad Street and Wormwood Street, reconstructing footways, a raised pedestrian crossing on Wormwood Street in line with the new eastern pedestrian route, enhancements to the public right of way through Bishopsgate Churchyard connecting Old Broad Street and Bishopsgate 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.

825. Collectively these are attributed **Low to Moderate** weight.

826. Social:

- The proposal would deliver a new social space at ground level in an area with limited open space for workers, visitors and residents and provide opportunities for relaxation and leisure.
- Learning and educational opportunities associated with the cultural spaces in the restored Bath House and at Level 2 of 65 Old Broad Street.
- The proposed cultural/events spaces will provide potential for the provision for cultural events to bring a new dynamic to the City and facilitate a 7/7 Destination City.
- The proposal would secure a S106 obligation of £1,308,676.00 towards affordable housing provision.

827. Collectively these are attributed **Low to Moderate** weight.

828. St Paul's Cathedral is a grade I listed building of very considerable importance and interest. It is an extremely high value heritage asset. Great weight has therefore been given to its conservation in line with NPPF para 199. In considering the weight to be given to the harm to the significance of St Paul's Cathedral when performing the balancing exercise it is necessary to consider the assessed level of harm and the heritage value of the asset in question. In this case the heritage value is extremely high, and the assessed level of less than substantial harm is slight. As such, in the balancing exercise, whilst considerable importance and weight has been attributed to the (albeit slight) failure to preserve its setting in LVMF 15B.1, the appropriate overall weight to be attributed to the less than substantial harm caused is considered, as a matter of judgement, to be moderate.

829. 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 and its setting. The planning considerations of this application need to be balanced and in this case the collective package of the public benefits secured would, on balance, outweigh the very slight level of heritage harm identified to the extremely high value designated heritage asset, thus complying with paragraph 202 of the NPPF.

### **Planning Obligations and Community Infrastructure Levy**

830. 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.

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

MCIL2

| <b>Contribution payable in accordance with the Mayor of London's policies</b> | <b>Contribution (excl. indexation)</b> | <b>Forwarded to the Mayor</b> | <b>City's charge for administration and monitoring</b> |
|---|--|-------------------------------|--|
| <b>2 payable</b>  | £4,892,026                             | £4,696,345                    | £195,681   |

### City CIL and S106 Planning Obligations

| <b>Liability in accordance with the City of London's policies</b>       | <b>Contribution (excl. indexation)</b> | <b>Available for allocation</b> | <b>Retained for administration and monitoring</b> |
|---|--|---------------------------------|---|
| <b>City CIL</b>   | £1,982,843.00                          | £1,883,700.00                   | £99,142.00  |
| <b>City Planning Obligations</b>  |  |                                 |   |
| Affordable Housing  | £1,321,895.00                          | £1,308,676.00                   | £13,219.00  |
| Local, Training, Skills and Job Brokerage                               | £793,137.00                            | £785,206.00                     | £7,931.00   |
| Carbon Reduction Shortfall (as designed)<br><i>Not indexed</i>          | £402,908.00                            | £402,908.00                     | £0  |
| Section 278 (Evaluation and Design Fee)<br><i>Not indexed</i>           | £50,000                                | £50,000                         | £0  |
| Security Measures Contribution (Eastern City Cluster)                   | £264,379.00                            | £261,735.00                     | £2,644.00   |
| S106 Monitoring Charge  | £5,500.00                              | £0                              | £5,500.00   |
| <b>Total liability in accordance with the City of London's policies</b> | <b>£4,820,662.00</b>                   | <b>£4,692,225</b>               | <b>£128,436.00</b>                                |

834. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and

reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Highway Reparation and other Highways Obligations  
*(Highways Schedule of Condition Survey, site access, consents, licences etc)*
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage *(Demolition & Construction)*
- Delivery and Servicing Management Plan *(including Consolidation)*
- Cycling Promotion Plan
- Construction Monitoring Cost *(£53,820 for First Year of development and £46,460 for subsequent years)*
- Legible London Contribution (£TBC)
- Carbon Offsetting
- 'Be Seen' Energy Performance Monitoring
- Utility Connection Requirements
- Section 278 Agreement (CoL)
- Public Routes
- Public Realm *(Management Plan)*
- Television Interference Survey
- Wind Audit
- Solar Glare
- Reprovision of public house
- Cultural Implementation Strategy
- Cultural/event space *(Visitor Management Plan)*
  - *Provision of space to be available free of charge for qualifying users 10am-6pm Monday- Friday and 12pm-10pm Saturdays, with private bookings being allowed outside of these hours*
- Maker/Studio/SME space *(details of specification, layout, facilities, operation and management)*
  - *Provision of 243 sqm of maker/studio space to be made available to qualifying users at a discounted market rent (no more than 70% of market rent)*

- Affordable Workspace
  - *A minimum of 25 desks will be made available to qualifying users at a discounted market rent (no more than 70% of market rent) for no less than the first 25 years to Qualifying Occupier at levels 3 and 4*
- Affordable Retail Space
  - *Provision of 112 sqm of affordable retail space to be made available to qualifying users at a discounted market rent (no more than 70% of market rent) at level 1*

835. 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.

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

- A raised pedestrian crossing on Wormwood Street in line with the new eastern pedestrian route
- Reconstruction of the footways fronting the application site in Yorkstone Paving
- Widening of the Old Broad Street eastern footway in Yorkstone paving
- Associated drainage works, to accommodate the new raised table
- Associated road markings to suit the new road layout
- Relocation/removal of street furniture to suit new layout
- A raised pedestrian crossing on Old Broad Street, connecting New Broad Street with the Site.
- Resurfacing the carriageways fronting the applicant's site
- Installation of loading bays, subject to traffic orders and road safety audits

#### Monitoring and Administrative Costs

837. 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.

838. 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)**

839. 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.

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

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

841. 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")).

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

843. 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**

844. 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, local finance considerations, and considering all other material considerations.
845. Objections have been received from statutory consultees and third parties, relating to the design of the development, its impact on designated heritage assets, LVMF views 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.
846. The proposed development would optimise the use of land to deliver a transformative new mixed-use destination for the Liverpool Street area by creating a new commercial and cultural hub for the City and London.
847. The proposed development comprises the partial demolition of the existing buildings and the development of the site comprising the construction of a new office-led building of ground floor plus 23 storey (plus two retained basement levels) with flexible retail/café at ground floor at 55 Old Broad Street. 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.
848. 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 5.7% 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.
849. Over 33,000 sqm (GIA) of Grade A office floorspace, which would be flexible, sustainable Grade A office floorspace in 55 Old Broad Street for circa 1,990 to 2,625 Full Time Equivalent office workers would be provided as part of the scheme. This is as well as 668 sqm GIA of office/maker/studio floorspace at Levels 3 and 4 at 65 Old Broad Street within which a minimum of 25 co-working desks will be available at affordable, discounted market rent level. Priority would

be given within this space to SMEs, start-ups and creatives who will benefit from high quality office space in the City of London.

850. The proposal also comprises the provision of a replacement public house with a re-imagined and enhanced facade. The proposal delivers an enlarged external seating, spill out space, and additional frontage, representing a qualitative improvement compared to the existing offer.
851. Whilst only part of the site is within the Eastern Cluster, it is in an area identified as being not inappropriate for tall buildings and as such 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 (2036) S12 (2) and S21 (2) due to adverse visual indirect impacts on designated heritage assets and protected views.
852. The proposals would preserve the significance and contribution of setting of all the above mentioned heritage assets except that of St Paul's Cathedral, which would experience a slight level of less than substantial harm through the slight erosion of its clear sky setting in the views from the northern end of Waterloo Bridge illustrated by LVMF 15B.1.
853. As such, the proposal would result in very minor conflict with Local Plan Policies CS12, DM12.1, 12.5, CS13 (1 and 2), draft City Plan policies S11 and London Place HE1 and HC1, and with the objective set out in Section 66 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.
854. The proposals would result in a slight level of harm to the setting of St Paul's Cathedral in LVMF 15B.1 although there would be no diminishment of its prominence or landmark quality with the view and the ability to recognise and appreciate St Paul's Cathedral as a Strategically Important Landmark would be preserved overall. The proposed development has been amended to mitigate this visual intrusion as far as possible through design amendments (through amendments to the rooftop balustrade). Nevertheless, the proposal would result in a slight degree of conflict with London Plan Policy HC4, Local Plan Policy CS13 (1 and 2), emerging City Plan 2040 Policy S13 and London Plan policy HC4, the LVMF SPG and the City of London Protected Views SPD.
855. Internal works to the Grade II Listed Bath House are presented in LPA Ref 23/00966/LBC and an assessment of the impacts to the fabric of the heritage asset is provided in this report above. In terms of external works to the Grade II Listed Bath House, the proposed development would preserve the special architectural and historic interest of the listed building and the contribution made by setting. The alterations would affect modern fabric and would lead to benign,

positive change in the surroundings of the asset. In terms of internal works to restore the Grade II Listed Bath House, these would focus on removing modern fabric while respecting original features and spaces.

856. The significance and setting of many surrounding designated heritage assets including London Wall: Remains of Roman and medieval wall from West End, Church of St Botolph Bishopsgate (Grade II\*) and Church Hall (Grade II) and the Drinking Fountains, Overthrows and Lanterns (Grade II), Church of All Hallows (Grade I), Great Eastern Hotel (Grade II\*) would be preserved.
857. In relation to other designated and non-designated heritage assets, it is considered that the proposed development would not harm their significance or setting.
858. 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 'Excellent' (with aspiration of 'Outstanding') for 55 Old Broad Street and BREEAM 'Excellent' for the retained 65 Old Broad Street and adopting Circular Economy Principles and integrated urban greening.
859. The proposed development will provide inclusive, inviting, and animated spaces, with extensive urban greening, particularly at 55 Old Broad Street, creating a new and much needed public open space in the heart of the City Cluster for people to pass through or linger close by the Liverpool Street Station.
860. The proposed development will accommodate 583 long stay cycling parking spaces (of which 471 spaces will be located within the basement and 112 spaces within the Visitor Cycle Pod) and 92 short stay cycle space (of which 72 spaces will be located in the Visitor Cycle Pod and 20 spaces in externally). The scheme is in compliance with Local Plan Policy 16.3 and London Plan policy 6.9.
861. 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.
862. It is the view of officers that the effect of the proposal will be to advance Local Plan Strategic Objective 1, and that Policy CS1 is complied with together with

policies relating to office floor space delivery, transport and public realm . Whilst there is an identified conflict with the following: 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 (2036) 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); it must also be taken into account the reasons why the proposal conflicts with those policies ,in particular, the slight degree of less than substantial harm to an extremely high value designated heritage asset and the GLA's London Views Management Framework SPG and City of London's Protected Views SPD. It is considered that the proposals comply with the development plan when considered as a whole.

863. 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.
864. 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.
865. 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).
866. 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.
867. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.



## **Background Papers**

### Consultation:

Thames Water, 5th June 2023

London City Airport, 6th June 2023

NATS, 6th June 2023

Environment Agency, 7th June 2023

Heathrow Safeguarding, 7th June 2023

Crossrail Safeguarding, 9th June 2023

Thames Water (Amended), 9th June 2023

Transport For London, 12th June 2023

Thames Water, 15th June 2023

Air Quality Team, 19th June 2023

Historic England (GLAAS) – 19th June 2023

The Georgian Group- 6th July 2023

Victorian Society- 12th July 2023

Historic England – 20th July 2023

Network Rail, 26th July 2023

London and Middlesex Archaeological Society – 1st August 2023

Surveyor to the Fabric of St Pauls, 11th August 2023

Transport for London – 11th August 2023

Planning Obligations Officer, 5th September 2023

SAVE Britain's Heritage, 27th September 2023

NATS, 4th October 2023

Heathrow Safeguarding, 5th October 2023

Historic England, 5th October 2023

Crossrail, 6th October 2023

Environmental Health Officer, 12th October 2023

London City Airport, 10th October 2023

Twentieth Century Society, 13th October 2023

Environment Agency, 18<sup>th</sup> October 2023

Transport for London, 20<sup>th</sup> October 2023

Thames Water, 20<sup>th</sup> October 2023

City Police – 24<sup>th</sup> October 2023

Historic Buildings and Places – 24<sup>th</sup> October 2023

City of London Archaeological Trust – 26<sup>th</sup> October 2023

City Police – 2<sup>nd</sup> November 2023

### Objections

Refer to appendix XXX

### Support

Refer to Appendix XXX

### Other

Agent response to Twentieth Century Comments – 25<sup>th</sup> October 2023

Agent Response to SAVE comments – 31<sup>st</sup> October 2023

### Application Papers

Application Form and Ownership Certificates, prepared by DP9

Planning Statement, prepared by DP9

Existing and Proposed Plans and Drawings, prepared by Fletcher Priest

Design and Access Statement (including Façade Access Strategy, Security Strategy and Suicide Prevention Assessment), prepared by Fletcher Priest

Landscape Statement and Plans, prepared by Vogt

Environmental Statement ('ES') Volume 1 (main ES chapters), prepared by Trium, 15 May 2023

ES Volume 2: Townscape, Heritage and Visual Impact Assessment ('THVIA'), prepared by Tavernor Consultancy, 15 May 2023

ES Volume 3: Technical Appendices, 15 May 2023



ES Non-Technical Summary, prepared by Trium, 15 May 2023

Energy Statement, prepared by Atelier Ten ('A10')

Sustainability Statement, prepared by A10

Whole Life Cycle Carbon Assessment, prepared by A10

Circular Economy Statement, prepared by A10

Statement of Community Involvement, prepared by AND

Social Value Statement, prepared by Social Value Portal

Construction Environmental Management Plan, prepared by Bam

Transport Assessment ('TA') including Waste Management Strategy, prepared by Momentum Transport Consultancy ('Momentum')

Cycling Promotion Plan (within the TA), prepared by Momentum

Delivery and Servicing Plan (within the TA), prepared by Momentum

Fire Statement, prepared by OFR

Economic Benefits Statement, prepared by Quod

Equality Statement, prepared by Quod

Health Impact Assessment, prepared by Quod

Utilities Statement, prepared by A10

Archaeological Desk-Based Assessment, prepared by MOLA

Flood Risk Assessment and Drainage Strategy, prepared by Heyne Tillet Steel ('HTS')

Demolition Plans, prepared by HTS

Lighting Strategy, prepared by A10

Ventilation and Extraction Statement, A10

Thermal Comfort Assessment, prepared by RWDI

Structural Report, prepared by HTS

Phase 1 Contamination Report, prepared by CGL

Biodiversity Report, prepared by Greengage

Environmental Net Gain Assessment, prepared by Greengage

Arboricultural Impact Assessment, prepared by Gristwood & Toms

Healthy Street Transport Assessment, prepared by Momentum, 15 May 2023

The Bath House – Heritage Strategy – 16<sup>th</sup> October 2023

BNG/UGF Summary Note, prepared by Greenage, 23<sup>rd</sup> October 2023

Cover Letter, prepared by DP9, 29<sup>th</sup> September 2023

Revised CIL Additional Information Form, prepared by DP9, 12<sup>th</sup> October 2023

Design and Access Statement Addendum, prepared by Fletcher Priest, 29<sup>th</sup> September 2023

Landscape Strategy Addendum, prepared by Vogt, 29<sup>th</sup> September 2023

EIA Compliance Note, prepared by Trium, 29<sup>th</sup> September 2023

Revised Cultural Strategy, prepared by AND London, 29<sup>th</sup> September 2023

Transport Response to City of London and TfL, prepared by Momentum, 29<sup>th</sup> September 2023

Revised Built Heritage Statement, prepared by RPS, 29<sup>th</sup> September 2023

### Existing Drawing Numbers

1813-FPA-XX-00-DR-A-16000, 1813-FPA-XX-00-DR-A-16003, 1813-FPA-XX-01-DR-A-16004, 1813-FPA-XX-02-DR-A-16005, 1813-FPA-XX-03-DR-A-16006, 1813-FPA-XX-04-DR-A-16007, 1813-FPA-XX-05-DR-A-16008, 1813-FPA-XX-06-DR-A-16009, 1813-FPA-XX-07-DR-A-16010, 1813-FPA-XX-08-DR-A-16011, 1813-FPA-XX-09-DR-A-16012, 1813-FPA-XX-10-DR-A-16013, 1813-FPA-XX-11-DR-A-16014, 1813-FPA-XX-B1-DR-A-16002, 1813-FPA-XX-B2-DR-A-16001, 1813-FPA-XX-RF-DR-A-16015, 1813-FPA-XX-ZZ-DR-A-16030, 1813-FPA-XX-ZZ-DR-A-16031, 1813-FPA-XX-ZZ-DR-A-16032, 1813-FPA-XX-ZZ-DR-A-16033, 1813-FPA-XX-ZZ-DR-A-16040, 1813-FPA-XX-ZZ-DR-A-16041, 1813-FPA-XX-ZZ-DR-A-16042 and 1813-FPA-XX-ZZ-DR-A-16043.

## **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:

The scheme provides 40,583sqm GIA floor space, comprising:

*55 Old Broad Street*

- 33,078 sqm of office floorspace;
- 125 sqm of retail/café floorspace (ground floor);

*65 Old Broad Street*

- 112 sqm of retail/café/maker/studio floorspace (ground floor);
- 243 sqm of maker/studio floorspace (level 1);
- 31 sqm of cultural/event floor space (Level 2 of 65 Old Broad Street)
- 668 sqm of office/maker/studio floorspace (Level 3 and 4).

*Bath House*

- 320sqm of cultural/event floor space at the Bath House.

*Other*

- 420 sqm of public house floorspace;
- 5587 sqm of ancillary floorspace (including basement levels).

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 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 and cultural events space (sui generis), flexible maker /

studio / office (Class F1(a)(b)(e)) and (Class E(g)), shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020).

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

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

### **Monitoring Measures**

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

## **Appendix B**

### **London Plan Policies**

#### Policy CG1 Building Strong and Inclusive Communities

- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D14 Noise
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries



- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

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

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

- Central Activities Zone (March 2016).
- Mayor's Transport Strategy (2018)

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

S1 Healthy and inclusive city

HL1 Inclusive buildings and spaces

HL2 Air quality

HL3 Noise and light pollution

HL4 Contaminated land and water quality

HL6 Public toilets

Policy HL9 Health Impact Assessments

S2 Safe and Secure City

SA1 Crowded Places

SA3 Designing in security

HS3 Residential environment

S4 Offices

OF1 Office development

S5 Retailing

RE2 Retail links

S6 Culture, Visitors and the Night -time Economy

CV2 Provision of Visitor Facilities

CV5 Public Art

S7 Smart Infrastructure and Utilities

S8 Design

DE1 Sustainability requirements

DE2 New development

DE3 Public realm

DE5 Terraces and viewing galleries

DE6 Shopfronts

DE8 Daylight and sunlight

DE9 Lighting

S9 Vehicular transport and servicing

VT1 The impacts of development on transport  
VT2 Freight and servicing  
Policy VT3 Vehicle Parking  
S10 Active travel and healthy streets  
AT1 Pedestrian movement  
AT2 Active travel including cycling  
AT3 Cycle parking  
S11 Historic environment  
HE1 Managing change to heritage assets  
HE2 Ancient monuments and archaeology  
HE3 Setting of the Tower of London World Heritage Site  
S12 Tall Buildings  
S13 Protected Views  
S14 Open spaces and green infrastructure  
OS1 Protection and Provision of Open Spaces  
OS2 City greening  
OS3 Biodiversity  
OS4 Trees  
S15 Climate resilience and flood risk  
CR1 Overheating and Urban Heat Island effect  
CR3 Sustainable drainage systems (SuDS)  
S16 Circular economy and waste  
CE1 Zero Waste City  
S21 City Cluster  
S27 Planning contributions

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

- Air Quality SPD (July 2017);

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

## Relevant Local Plan Policies

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### ***CS14 Tall buildings in suitable places***

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

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

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

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



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

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

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

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

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

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

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

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

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

### ***CS21 Protect and provide housing***

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

## ***CS22 Maximise community facilities***

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

### ***DM1.1 Protection of office accommodation***

To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable office use and there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons: prejudicing the primary business function of the City;

- jeopardising the future assembly and delivery of large office development sites;
- removing existing stock for which there is demand in the office market or long term viable need;
- introducing uses that adversely affect the existing beneficial mix of commercial uses.

### ***DM1.3 Small and medium business units***

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

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

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

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

### ***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: 23/00469/FULEIA & 23/00966/LBC

### 55 And 65 Old Broad Street London EC2M 1RX

**Partial demolition of existing buildings and the redevelopment of the site comprising the construction of a new building comprising ground floor plus 23 upper storeys plus 2 existing basement levels (55 Old Broad Street) for the provision of office space (Class E(g)), flexible retail / cafe (Class E(a)(b)), retention of ground floor plus 5 storey building (65 Old Broad Street) for the provision of maker / studio (Class E(g)), flexible retail / cafe / maker / studio (Class E(a)(b)(g)), flexible maker / studio / office (Class E(g)), renovation of Grade II Listed Bath House building for the provision of cultural / event uses (Sui Generis), provision of public house (Sui Generis) and improvements to public realm and routes, ancillary basement cycle parking, servicing and plant, highway improvements and other works associated with the proposed development.**

## 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, after RIBA Stage 4,; an update to the approved detailed Circular Economy Statement to reaffirm the proposed strategy, to include a waste management plan, shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of the new building

elements. 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, an update to the approved detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by 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: DM10.8, DM16.2. These details are required prior to commencement in order that a

record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

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.

- 5 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.

- 6 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.

- 7 There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works

may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)

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

- 8 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.
  
- 9 Prior to the commencement of the development, excluding demolition, a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for

the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.

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

- 10 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.

- 11 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.

- 12 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:

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

Where appropriate, details of a programme for delivering related positive public benefits



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.

- 13 No demolition or development shall take place until a 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, which shall include the statement of significance and research objectives, and
- A. 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 WSI.
- REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 14 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.
- 15 Irrespective of any approved plans, prior to construction , full details of the proposed basement configuration and foundation design, and method statements, will be submitted to and approved in writing by the City of London Corporation in consultation with GLAAS. REASON: To ensure the preservation and display of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 16 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with



the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

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

- 17 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.

- 18 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.

- 19 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 240m<sup>3</sup>; (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works; 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.
- 20 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.
- 21 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.

22 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.

23 There shall be no occupation beyond 35,000 sqm of office space 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 additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason - The development may lead to low / no water pressures 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. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues

24 No construction shall take place within 5m of a water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.

Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

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

Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

- 26 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.

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

28 28. 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 and columns;

(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 public house, including all elevations, surface treatments, planters, seating, lighting, s drainage, irrigation and any infrastructure required to deliver programming and varied uses;

(h) details of soffits, hand rails and balustrades;

(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, DM10.1, DM10.5, DM12.2.

- 29 Before any works thereby affected are begun, details of all balustrades to external terraces 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, DM10.1, DM10.5, DM12.2.

- 30 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, DM10.1, DM10.5, DM12.2.

- 31 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.

- 32 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, DM10.1, DM10.5, DM12.2.

- 33 All unbuilt surfaces, including the central public space, new public routes, undercroft spaces, and trees approved for wind mitigation, shall be treated in accordance with a landscaping scheme, including details to be submitted 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.

- 34 Before any works hereby permitted are begun additional details and information in respect of the following shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) full details and material specifications of the of the ground floor public spaces, including surfaces, entrances, fenestration, planters, cycle stands, seating, bollards, lighting, soffits and facades of routes, drainage, irrigation, roller shutters and any infrastructure required to deliver programmed and varied uses;
  - (b) details of wayfinding and signage, including the TfL underground roundel

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.4, DM10.8.

- 35 35. Before any works hereby affected, details of the following shall be submitted and approved in writing by the Local Planning Authority:
- (a) details of all landscaping to roof terraces and green roofs, in all buildings, as relevant within the application site
  - (b) details of the glazed link and junctions with the listed building
  - (c) Details of the background screen to the Bath House, incorporated in the facade of 55 Old Broad Street;
  - (d) Details of the surface surrounding the Bath House, including particulars and material samples

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



appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.4, DM10.8.

- 36 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; c. the landscaping of the public realm; and d. confirmation that the requested details achieve or exceed the proposed UGF for the site; shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details and 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, and Draft City Plan: S14, OS2.
- 37 Prior the commencement of the development, excluding demolition, an Ecological Management Plan shall be submitted to the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations and management. REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity, in accordance with the following policies of the Local Plan: DM18.2, DM19.2, and Draft City Plan: S14, OS2.
- 38 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: DMI0.1.
- 39 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.

40 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.

41 41. None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling, any temporary works, and site investigations, have been submitted to and approved in writing by the Local Planning Authority which:-

i. Accommodate the Elizabeth line infrastructure, including any temporary works associated with the Elizabeth line (formerly known as Crossrail),

ii. Mitigate the effects on the Elizabeth line, of ground movement arising from the development. The development shall be carried out in all respects in accordance with the approved design and method statements.

All structures and works comprised within the development hereby permitted which are required by paragraphs C1(i), C1 (ii) of this condition shall be completed, in their entirety, before any part of the building[s] hereby permitted is/are occupied.

42 Before the pre-commencement/Site formation/Demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority. a) Provide an overview of the overall development including both design on temporary and permanent works. b) Provide detailed design and Risk Assessment and Method Statement (RAMS) for the demolition

works. c) Identify and accommodate the location of the existing London Underground structures. d) Details of any changes in loading to LU's infrastructure considering sequence of temporary and permanent works. e) Carry out a staged ground movement assessment (GMA). Assess structure/tunnel impact due to ground movement arising from different stages of temporary and permanent works and associated construction activities. f) Mitigate the effects of noise and vibration arising from the adjoining railway operations within the structures. g) Written confirmation will be required from Thames Water or other water authority that any increased drainage or sewage from the site will not be discharged directly or indirectly into London Underground's drainage system.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

- 43 Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority. a) Prior to commencement of each phase of the development, provide detailed design for foundations, basement, and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent). b) Site specific Risk Assessments and Method Statements (RAMS) for any activities (groundworks, piling) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing. c) Details of any changes in loading to LU's infrastructure considering sequence of temporary and permanent works. d) Update/Complete the staged ground movement assessment (GMA). Assess structure/tunnel impact due to ground movement arising from different stages of temporary and permanent works and associated construction activities. e) No support to be taken from LU's land or structures.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

- 44 Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority. a) Provide detailed design for all superstructure works (temporary and permanent) b) Site specific Risk Assessments and Method Statements (RAMS) for any activities (craneage, scaffolding, use of tall plant) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing. c) Details of any changes in loading to LU's infrastructure considering sequence of temporary and permanent works. d) Update/Complete the staged ground movement assessment (GMA). Assess structure/tunnel impact due to ground movement arising from different stages

of temporary and permanent works and associated construction activities. e)  
No support to be taken from LU's land or structures.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

- 45 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.
- 46 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.
- 47 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.
- 48 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.

- 49 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.
- 50 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.
- 51 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.
- 52 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.
- 53 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.

54 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.

55 Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.

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

56 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.

57 A post construction BREEAM assessment demonstrating that a minimum target rating of 'excellent' has been achieved (provided that it is satisfied all reasonable endeavours have been used to achieve an 'Outstanding' rating) separate for 55 and 65 Old Broad Street, 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.

- 58 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 mailto: 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.

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

- 59 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 583 long stay pedal cycle spaces, and a minimum of 92 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.

- 60 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 DMI0.8, London Plan policy TS cycling, emerging City Plan policy 6.3.24.

- 61 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

- 62 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.

63 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.

64 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.

65 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.

66 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.

67 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.

68 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.

- 69 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.
- 70 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.
- 71 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.
- 72 Unless otherwise approved by the Local Planning Authority, no plant or telecommunications equipment shall be installed on the exterior of the building, including any plan or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.  
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DMI0.1.
- 73 No live or recorded music that can be heard outside the premises of 65 Old Broad Street and the Bath House shall be played.  
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 74 The Class E/Sui Generis uses hereby permitted shall not be open to customers between the hours of (23:30) on one day and (07:00) on the following day.  
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 75 No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.

- 76 Self-closing mechanisms must be fitted on all of the doors of the Public House (Sui Generis) use on the ground floor before the use commences and shall be retained for the life of the premises. The doors must not be left open except in an emergency or for maintenance purposes.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 77 A further set of doors must be fitted between the external doors on the ground floor of the pub which is Sui Generis and this extra set of doors shall be retained for the life of the premises. These doors must not be left open except in an emergency or for maintenance purposes.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 78 78. The roof terraces on Level 2 of 65 Old Broad Street and at 55 Old Broad Street hereby permitted shall not be used or accessed between the hours of 20:00 on one day and 08:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 79 No amplified or other music shall be played on any roof terraces.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 80 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 (23:30 for Public House, Sui Generis Use) 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.

- 81 81. (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 most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the 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.

82 Works shall not begin 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 development 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: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.

83 Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used so that the noise level in the nearest neighbouring residential bedrooms does not exceed NR30 attributable to the proposed commercial use. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter.

REASON: To protect the amenities of residential occupiers in the building in accordance with the following policies of the Local Plan: DM21.3, DM21.5.

84 As part of the Construction Environmental Management Plan a local NO<sub>2</sub> monitoring strategy shall be submitted. This should define a baseline and quantify the impact of the construction phase of the proposed development. Both long-term and short-term NO<sub>2</sub> objectives should be taken into account when designing the monitoring strategy, with due attention provided to nearby receptors and the diurnal nature of construction vehicle emissions.

REASON: In accordance with the following policy of the Local Plan: DM15.6 to maintain local air quality and ensure that NO2 concentrations remain within relevant UK objectives during the construction phase in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.

- 85 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 restaurant use. 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 Class A use takes place. (Consideration needs to be given to flueless systems that operate on recirculated air).  
REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.
- 86 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.
- 87 No cooking shall take place within any commercial kitchen 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.
- 88 A revised air quality positive statement (i.e., ES AQ chapter Table 8.12 or addendum note) should be provided to include all air quality measures adopted by the scheme.  
REASON: In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan.
- 89 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: DMI0.1.

- 90 Prior to occupation of the buildings hereby approved, a Fire Strategy shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To ensure that the development incorporates the necessary fire safety measures.

- 91 The development shall provide (all figures GIA and excluding plant):

55 Old Broad Street

- o 33,078 sqm of office floorspace (Class E(g));
- o 125 sqm of retail/café floorspace (ground floor)(Class E(a)(b));

65 Old Broad Street

- o 112 sqm of retail/café/maker/studio floorspace (ground floor)(Class E(a)(b) and (Class F1(a)(b)(e));
- o 243 sqm of maker/studio floorspace (level 1)(Class F1(a)(b)(e));
- o 31 sqm of cultural/event floor space (Level 2 of 65 Old Broad Street)(Sui Generis);
- o 668 sqm of office/maker/studio floorspace (Level 3 and 4)(Class F1(a)(b)(e) and (Class E(g));

Bath House

- o 320sqm of cultural/event floor space at the Bath House (Sui Generis);

Other

- o 420 sqm of public house floorspace (Sui Generis);
- o 5587 sqm of ancillary floorspace (including basement levels).

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

- 92 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:

1813-FPA-XX-00-DR-A-16000, 1813-FPA-XX-B2-DR-A-16101-P05, 1813-FPA-XX-B1-DR-A-16102-P05, 1813-FPA-XX-00-DR-A-16103-P05, 1813-FPA-XX-01-DR-A-16104-P05, 1813-FPA-XX-02-DR-A-16105-P05, 1813-FPA-XX-03-DR-A-16106-P05, 1813-FPA-XX-04-DR-A-16107-P05, 1813-FPA-XX-05-DR-A-16108-P05, 1813-FPA-XX-06-DR-A-16109-P05, 1813-FPA-XX-07-DR-A-16110-P05, 1813-FPA-XX-08-DR-A-16111-P05, 1813-FPA-XX-09-DR-A-16112-P05, 1813-FPA-XX-10-DR-A-16113-P05, 1813-FPA-XX-11-DR-A-16114-P05, 1813-FPA-XX-12-DR-A-16115-P05, 1813-FPA-XX-13-DR-A-16116-P05, 1813-FPA-XX-14-DR-A-16117-P05, 1813-FPA-XX-15-DR-A-



16118-P05, 1813-FPA-XX-16-DR-A-16119-P05, 1813-FPA-XX-17-DR-A-16120-P05, 1813-FPA-XX-18-DR-A-16121-P05, 1813-FPA-XX-19-DR-A-16122-P05, 1813-FPA-XX-20-DR-A-16123-P05, 1813-FPA-XX-21-DR-A-16124-P05, 1813-FPA-XX-22-DR-A-16125-P05, 1813-FPA-XX-23-DR-A-16126-P05, 1813-FPA-XX-RF-DR-A-16127-P05, 1813-FPA-XX-ZZ-DR-A-16200-P05, 1813-FPA-XX-ZZ-DR-A-16201-P05, 1813-FPA-XX-ZZ-DR-A-16202-P05, 1813-FPA-XX-ZZ-DR-A-16203-P05, 1813-FPA-XX-ZZ-DR-A-16250-P05, 1813-FPA-XX-ZZ-DR-A-16300-P05, 1813-FPA-XX-ZZ-DR-A-16301-P05, 1813-FPA-XX-ZZ-DR-A-16302-P05, 1813-FPA-XX-ZZ-DR-A-16303-P05, VLA-DR-PL3030-1000-Rev02, VLA-DR-PL3030-1010-Rev02, VLA-DR-PL3030-4000-Rev02.

2724-HTS-ZZ-B2-DR-S-3080\_P2, 2724-HTS-ZZ-B1-DR-S-3090\_P2, 2724-HTS-ZZ-00-DR-S-3100\_P2, 2724-HTS-ZZ-01-DR-S-3110\_P2, 2724-HTS-ZZ-02-DR-S-3120\_P2, 2724-HTS-ZZ-03-DR-S-3130\_P2, 2724-HTS-ZZ-04-DR-S-3140\_P2, 2724-HTS-ZZ-05-DR-S-3150\_P2, 2724-HTS-ZZ-06-DR-S-3160\_P2, 2724-HTS-ZZ-07-DR-S-3170\_P2, 2724-HTS-ZZ-08-DR-S-3180\_P2, 2724-HTS-ZZ-09-DR-S-3190\_P2, 2724-HTS-ZZ-10-DR-S-3200\_P2, 2724-HTS-ZZ-RF-DR-S-3210\_P2, 2724-HTS-ZZ-ZZ-DR-S-3500\_P2, 2724-HTS-ZZ-ZZ-DR-S-3501\_P2, 2724-HTS-ZZ-ZZ-DR-S-3502\_P2, 2724-HTS-ZZ-ZZ-DR-S-3600\_P1.

## INFORMATIVES

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

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

a full pre application advice service has been offered;

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

- 2 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk) . Application



forms should be completed on line via <https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=04%7C01%7C%7Cbba7031c73fa4c2c1b9008d97f365d16%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637680693729110381%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTil6Ik1haWwiLCJXVC> I6Mn0%3D%7C1000&data=Fv2tSYARCTno6G8FVZjbb%2Bj0LroseLE6m79qiGerVkM%3D&reserved=0. Please refer to the Wholesale; Business customers; Groundwater discharges section.

- 3 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.  
<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-yourdevelopment/working-near-our-pipes> Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk)
- 4 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 5 The Developer is recommended to assess and mitigate the possible effects of noise and vibration arising from the operation of the Elizabeth line.
- 6 The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP. In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.
- 7 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

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

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

Office 185GBP per sq.m  
Retail 165GBP per sq.m  
Hotel 140GBP per sq.m  
All other uses 80GBP per sq.m

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

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

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

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

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

- 9 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.
- 10 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.
- 11 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.

- 12 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.
- 13 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".

- 14 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.
- 15 The landowners, managing operators and tenants are required to adhere to the actions of the Considerate Lighting Charter as set in the City of London Appendix A of the City of London Lighting Supplementary Planning Document 17/11/2022
- 16 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.
- 17 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
- 18 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.
- 19 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.