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| <b>Committee:</b>   | <b>Date:</b>                              |
| Planning Applications Sub Committee   | 13 February 2024                          |
| <b>Subject:</b><br>Middlesex Street Estate, Gravel Lane, London, E1 7AF<br>Change of use of: (i) part basement, part ground and part first floor levels of six retail units and ancillary residential and ancillary commercial areas, to provide a police facility (sui generis) and ancillary residential parking and storage areas and facilities, and (ii) part ground and part first floor levels from gym use to community space (Class F2); and external alterations including: shopfront changes, installation of plant, erection of flue and louvre treatment, works to podium level and associated landscaping including erection of garden room, associated highways works to Gravel Lane and landscaping, installation of security measures; and associated works. | <b>Public</b>                             |
| <b>Ward:</b> Portsoken  | <b>For Decision</b>                       |
| <b>Registered No:</b> 23/00882/FULL   | <b>Registered on:</b><br>4 September 2023 |
| <b>Conservation Area:</b> No  | <b>Listed Building:</b> No                |

### Summary

The site is Middlesex Street Estate which is located in the Portsoken Ward.

The Applicant is the City Surveyor's Department on behalf of the City of London Police (CoLP). The City of London is the Applicant therefore a Handling Note has been prepared in accordance with the procedure.

Middlesex Street Estate comprises 234 residential units, 3,819 sqm retail floorspace and a library. It comprises a central podium/garden area, four residential blocks (five storeys above a podium level) with a taller tower in the centre (Petticoat Tower).

Planning permission is sought for the change of use of part of the site from ancillary residential parking and retail units, to a police facility and ancillary community uses. The total uplift in floorspace is 24 sqm for the proposed Garden Room for residents at podium level.

As a proposed operational facility, the Eastern Base would only be occupied by uniformed City of London Police officers, who report to the Base and then go out on

patrol to serve the community. No custodial facilities or a public reception facility would be included. Rapid response vehicles will not be based at the Site.

The application includes change of use from gym to community space, external alterations related to the new use, new plant, new landscaping to resident podium level and associated works. The proposal also includes associated highway works to Gravel Lane.

The Applicant states the east of the City contains significant demand for the CoLP with night time-related offences and highlights future development in the area will increase future demand. This strategic operational need in the east of the City is reinforced by the planned closure of Bishopsgate Police Station.

There is an existing police facility at Middlesex Street Estate approved in 2019 (app. ref.19/00127/FULLR3) for police parking at basement level, however additional functions are needed for the Eastern Base which cannot be provided within the current secure compound in the Estate. Therefore this application seeks to extend the existing police use at the site.

The Community and Children's Services Committee met on 23 January 2023 and resolved that identified spaces at car parks and seven shop units in Gravel Lane were surplus to housing need.

The Applicant has confirmed that alternative sites were considered and discounted due to security and structural concerns, because the City of London is not the freeholder, or it did not meet location requirements. In addition, significant resources have already been invested into the site as a base for police vehicles following approval in 2019.

During the determination period, amendments were made by the Applicant in response to comments received and included improved accessibility to podium/garden level, changes to landscaping at Gravel Lane and additional details for operational management.

A comprehensive statutory consultation was undertaken. A total of 74 objections from the public were received citing a wide range of issues including impact to amenity of residents and transport impacts.

The Environmental Health team were consulted and stated that due to the proposals being within a highly residential area, the development will require close adherence to the supplied Operational Management Plan, compliance with internal City of London Police operational codes and will require diligent monitoring by CoLP coupled with detailed complaint investigation and resolution protocols and regular resident liaison to prevent unacceptable noise impacts particularly at night, between 2300 and 0700.

The applicant has confirmed that the implementation of night time shift patterns would ensure a lower number of Officer movements attending the facility as a non-operational base overnight. The number of trips to / from the site would reduce during overnight periods owing to the proposed shift structure. In addition, the majority of vehicle activity at this time is likely to be via the vehicle ramp, with the external pavement noise being very limited.

The Environmental Health team state there is likely to remain some residual noise impacts for residents during the ultimate end use of the facility, specifically from vehicle

and officer movements. In addition, the Environmental Health team state that the construction phase will be highly impactful due to its location, the number of residents above the site and the unique construction of the estate leading to heavy noise transference throughout. There are also cumulative impacts from significant development adjoining the estate e.g. 115 Houndsditch. The Scheme of Protective Works for the Demolition and Construction phases may need to adopt controls in excess of the standards outlined in the existing Code of Construction Practice.

For vehicle trips, there will be 24 operating vehicles associated with these teams and 18 of these vehicles will be in operation on a 24-hour basis across the City. Vehicles would arrive / depart the site upon inception and cessation of specific shifts. Police officers travelling to / from the site from home would travel by public transport. It is expected there will be up to 6 vehicle movements during a 30 min period either side of a shift. A further 6 vehicles (associated with the dog handlers) would enter and exit on an ad-hoc basis across the day only. It is also expected that there will be 9 motorcycles in use during the core part of the day. It is noted that the existing site already generates some vehicle movements and the expected vehicle trips are therefore not considered significant.

In summary, the relocation of the CoL Police to the Eastern Base will increase vehicle movements in the area. However, the increase in trips is not expected to be significant and can be accommodated on the existing local road network. These trips would also not be new trips on the wider CoL road network, as they would represent displaced trips. Therefore, there will be no overall increase in vehicle trips within CoL area.

The existing development provides 67 car parking spaces for the residents, 38 of these are located at basement level and 29 at ground floor level. It is proposed to reduce the number of car parking spaces used by residents to 43 (a reduction of 24 car parking spaces) and increase the number of car parking spaces of the CoL Police to 52 car parking spaces. The residents parking area would be improved as part of the proposals via the introduction of CCTV, new surfacing, better access control and vehicle charging points with seven chargers will be installed in the resident area, with 'passive provision' for an additional seven bays to be easily converted in the future.

It is understood that 34 resident parking permits are in circulation in total and this current allocation of spaces for residents would be maintained as part of the proposals. Based on the results of the surveys, the applicant considers that the reduction in resident parking would not adversely affect the operation of the car park as the recorded maximum demand for private car parking would be provided for, and this would be in excess of the number of identified permit holders (+11 in circulation and +17 as recorded in the maximum parking surveys) providing some level of parking contingency. The Applicant states there will be enhanced car parking management procedures implemented.

The volume of traffic that would be generated by the site would be spread across the day dictated by shift patterns, and would generally avoid the typical network 'peak hours'. The applicant states that the proposals are not intended as rapid response operations, and therefore vehicle speeds would be typical of ordinary traffic. The volume of traffic expected does not create traffic safety concerns in and of itself given the moderate increase expected and the fact that existing trips already exist on the network.

The existing Blue Badge parking space on Gravel Lane is to be retained and relocated.

For existing cycle parking, there are 26 covered spaces at ground floor and 24 spaces on the podium level. It is proposed to provide 44 cycle parking spaces within the police compound. For the commercial units, 24 cycle parking spaces are proposed at ground floor level. For the residential element, new storage is proposed for up to 205 cycle parking spaces at basement level. In addition, there will be 11 wider space cycle bays provided in a new secure area at ground level. There would be an increase in the number of cycle parking spaces and improvements to the cycle parking facilities (notably for accessible users), and this is welcomed.

The delivery and servicing area will be maintained at ground floor level. The applicant has undertaken a servicing vehicle survey, which shows 12 vehicles per day were undertaking servicing / deliveries and this includes 2 visits for refuse vehicles which is considered acceptable, subject to conditions.

Highway improvement works are proposed along the section of Gravel Lane fronting the site. The works include (but not limited to) partial footway widening to maintain an improved road alignment and footway width. Any proposed changes to on-street car parking would also be subject to public consultation but it is at this stage proposed that there would be the relocation of an existing disabled bay to the south with changes.

The site is not within a Conservation Area and is not listed; it is not adjacent to any listed buildings.

As the Middlesex Street Estate is not considered to meet the criteria to be identified as a non-designated heritage asset, there would be no impact in this respect. The proposals would preserve the character, appearance and significance of the Wentworth Street Conservation Area, the only designated heritage asset identified as having the potential to be impacted by the proposals. As such, the proposals are considered to accord with Local Plan Policies CS 12 and DM 12.1, emerging City Plan policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs in relation to heritage.

There would be a degree of visual impact by expanding the existing police facility within the Estate, and this would be particularly noticeable on Gravel Lane. Although the detailed design conditions would further seek to mitigate any visual impacts and refine the delivery of the proposals, by virtue of their impact on Gravel Lane the proposals are considered to be contrary to Local Plan policies CS10 and DM10.1. However this is considered acceptable given other material considerations, in this case, the strategic operational requirements of the police. In addition, a public art display is proposed in the windows to mitigate this impact.

In sustainability terms, the application is predominantly a change of use scheme with limited strip out, opening up, and new build works proposed to improve layout, security, and operational performance of the facility as outlined below. This limited scope of works helps to minimise upfront carbon emissions. Conditions are recommended.

For urban greening and biodiversity, the podium currently contains a lush and well-established green space with vegetation predominantly in raised planters. The planting beds include a wide range of plant species. The landscaping proposal will increase greening in the region of 25% by area and 30% in terms of biodiversity. An Ecological Management Plan (EMP) is recommended by condition to be produced and

implemented for the site providing a high level of detail on the ecological landscaping features selected, and to ensure they retain their ecological benefit in the long term.

Overall, the proposed scheme is expected to provide a range of sustainability benefits compared to the existing building. The City supports schemes which prioritise retrofit over new build and the development makes use of a constrained site with load grade structure, which has limited access to daylight and ventilation. Heating, power and ventilation strategies are further restricted by strict security requirements connected to the occupier and use. The installation of all electrical plant (except for emergency generators), a combined heating and cool system and domestic hot water supply equipped with Air Source Heat Pumps (ASHPs) will significantly improve operational efficiency and reduce carbon emissions.

The proposal includes additional amenities for the exclusive use of residents including improved cycle storage at basement level, new dedicated cycle storage and entrance at ground level, a new garden room at podium level, a new landscaped podium area, an estate meeting room and facility at ground floor level, and public art in the windows of Gravel Lane.

The principle of the police use is considered acceptable, subject to conditions, in this location to support the strategic operational need identified by the police and to provide essential infrastructure required in the City.

There will be a loss of six retail units and a gym unit in proposals with two of the existing units already vacant. The applicant has demonstrated that the impacts to the retail provision in the wider area will not be adversely affected. The Applicant has confirmed that three of the units have relocated in or near the City, and one relocated to East London.

Although there has been some relocation of retail units and active frontage is proposed through public art, the proposal is considered to be contrary to Local Plan policies CS20 and DM20.3, and draft City Plan Policy RE3, due to the loss of retail in proximity to residential uses and in the absence of active marketing and vacancy information for these units. However, due to the provision of active frontage through the installation of public art on the Gravel Lane frontage, the wider provision of shops in the area, and the strategic operational need for the police use, the loss of retail is considered acceptable in this case.

The proposed development will require planning obligations to be secured in a Section 106 unilateral undertaking to mitigate the impact of the development to make it acceptable in planning terms.

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 development plan when taken as a whole 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.

Paragraph 101 of the NPPF states that planning decisions should promote public safety and should take into account wider security and defence requirements including

by recognising and supporting development required for operational defence and security purposes.

The London Plan states that proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies, and that seek to make best use of land including the public-sector estate, should be supported.

The adopted Local Plan Policy CS3 states the importance of ensuring the City is secure from crime, disorder and terrorism which includes proactively managing night-time entertainment to minimise disturbance to residents and workers, and to ensure that development takes account of the need for resilience so that the residential and business communities are better prepared for, and able to recover from, emergencies.

Officers consider this to be a finely balanced case whereby the impact to residential amenity has been considered in detail. The proposed use represents a strategic need to maintain safety and security in the east of the City. The proposal would make the best use of land, optimising the site capacity to facilitate these essential operational facilities.

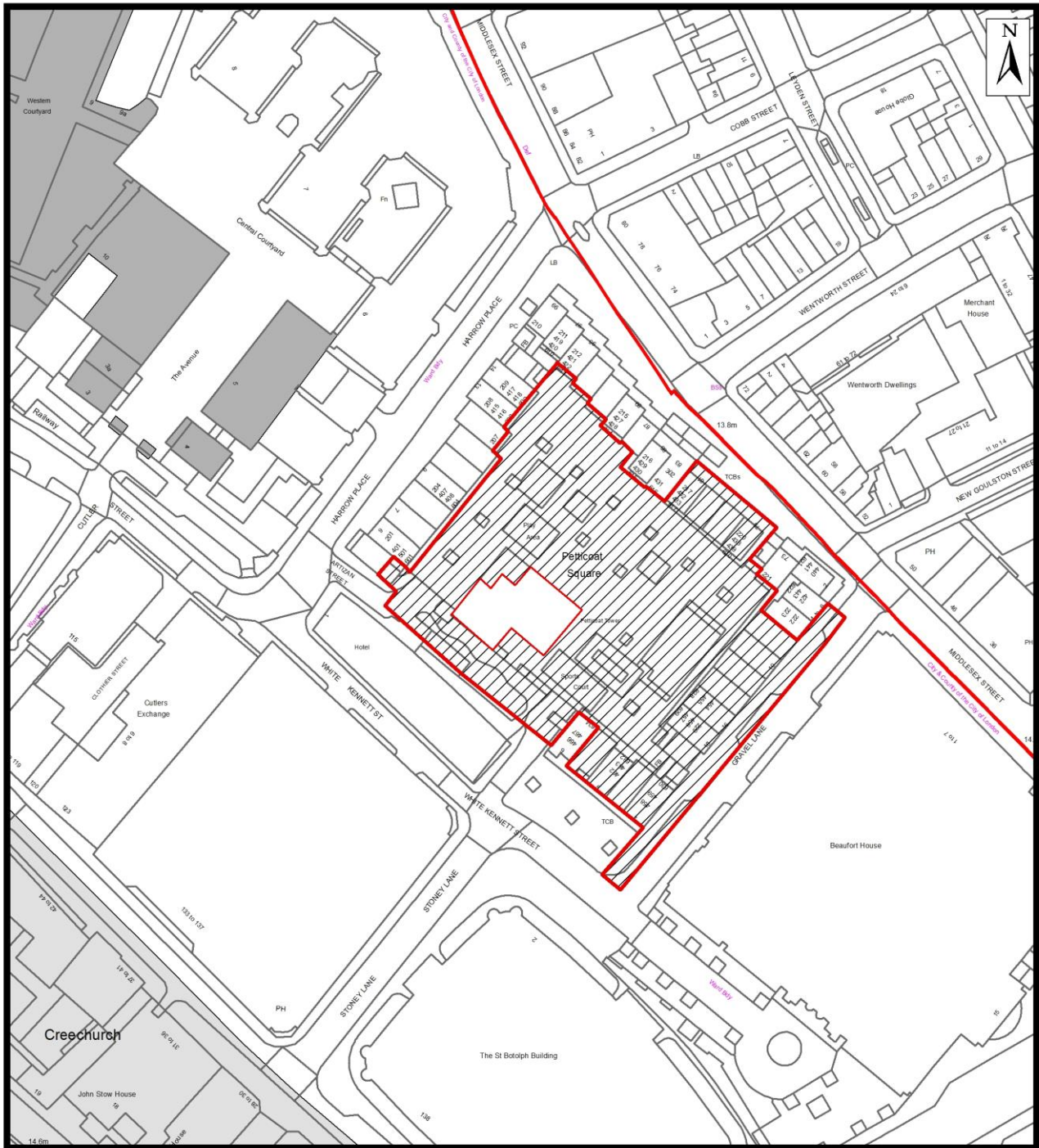
In addition, Officers consider there to be additional amenities for exclusive use of residents from the proposal including a dedicated estate office with meeting space, new cycle storage at ground with dedicated cycle lifts to basement, improved cycle facilities at basement level, and a new garden room at podium level.

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

## **Recommendation**

1. That the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule, subject to:
  - a. the City Corporation as landowner giving a commitment (through a resolution or delegated decision) that it will comply with the planning obligations in connection with the development; and
  - b. a unilateral undertaking being executed in respect of those matters set out in the report, the decision notice not to be issued until the commitment/resolution has been given and a unilateral undertaking has been completed.
2. That your Officers be instructed to negotiate the unilateral undertaking.

# Site Location Plan



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ADDRESS:  
Middlesex Street Estate, Gravel Lane E1 7AF

CASE No.  
23/00882/FULL

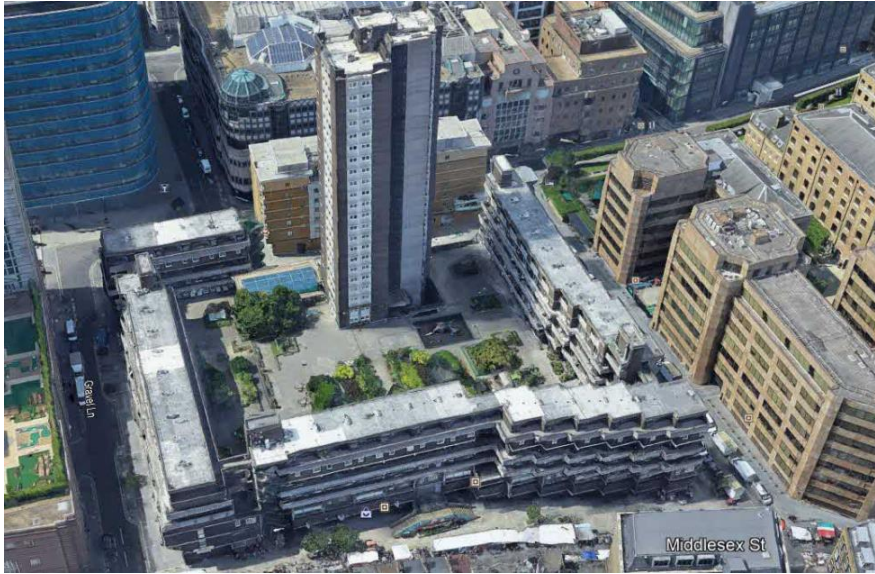
-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY
-  CITY OF LONDON BOUNDARY



ENVIRONMENT DEPARTMENT



## Site photographs



**Image 1:** Aerial view of Middlesex Street Estate



**Image 2:** Existing podium level with garden



**Image 3:** Existing Gravel Lane street view

# Main Report

## Site and Surroundings

1. The site is the Middlesex Street Estate, located in the Portsoken Ward. It is on the boundary of the City of London and the London Borough of Tower Hamlets. The Estate is bounded by Middlesex Street, Gravel Lane, White Kennett Street, and Harrow Place.
2. The Estate comprises a mixed-use development that includes 234 residential units, 3,819 sqm retail floorspace and a library and community centre. It comprises four residential blocks (five storeys above a podium level) with a taller tower in the centre (Petticoat Tower). The residential units are accessed via an elevated podium.
3. The existing basement level is access via a ramp from Artizan Street and is currently split into a section for secure parking for police vehicles, and for residential parking and storage.
4. The existing ground floor comprises car parking and refuse storage for commercial and residential uses and is accessed from Artizan Street. In addition, servicing takes place at this level.
5. The existing first floor car park was taken out of use and a ramp leading to it previously removed.
6. There are six existing retail units and one existing gym included in this application and these extend over basement, ground and first floor levels.
7. In addition, the Artizan Street Library and Community Centre is based at the site.
8. The site is not within a Conservation Area. The nearest Conservation Area to the site in the City is the Bishopsgate Conservation Area to the northwest. The site is opposite the Wentworth Street Conservation Area in the London Borough of Tower Hamlets to the northeast.
9. The Site does not contain any listed buildings and is not immediately adjacent to any listed buildings. The buildings on the site are not considered to be non-designated heritage assets.

## Planning history

10. Relevant planning history at the site:
  - **App. ref. 21/00527/FULL** – Granted on 25 July 2022 for the installation of external horizontal and vertical pipework across the site including: five vertical risers and pipework at levels two (podium level), four and six; elements of which will be boxed in and painted to match background materials.
  - **App. ref. 19/00127/FULLR3** – Granted on 14 May 2019 under Section 73 of the Town and County Planning Act 1990 to vary condition 2 of the planning

permission (app. ref. 4361) in order to allow part of the car park accommodation (2,100 sqm) at basement level for the construction of a secure parking area with ancillary uses and a small office.

- **App. ref. 14/00371/FULLR3** – Granted on 11 September 2014 for: Removal of existing redundant car park ramps in order to create a new communal and public space to include new pedestrian space, paving, green walls and lighting. Installation of a new entrance canopy to Petticoat Tower.
- **App. ref. 4361** – Granted on 16 February 1965 for the construction of Middlesex Street Estate.

### **Proposals**

11. The development proposals comprise the creation of a new operational base ('Eastern Base') for the City of London Police (CoLP), providing a location in the east side of the CoL area which will complement the new police headquarters at Salisbury Square. It would include police car parking, office and 'touch-down' facilities for the police.
12. Planning permission is sought for the change of use of part of site from ancillary residential parking and retail units, to a police facility and ancillary community uses, and for external alterations. The application relates to part of the basement, ground, first floor, and podium level where the resident garden is located.
13. There is an existing police facility at Middlesex Street Estate approved in 2019 (app. ref. 19/00127/FULLR3) for police parking at basement level, however additional functions are needed for the Eastern Base which cannot be provided within the current secure compound in the Estate. Therefore this application seeks to extend the existing police use at the site.
14. The proposed Eastern Base will only be occupied by uniformed City of London Police officers, who report to the Base and then go out on patrol to serve the community. No custodial facilities or a public reception facility would be included. In addition, there will be a small number of kennels for dog unit officers to place their dogs at the start and end of their shift; these dogs are not left in their kennels overnight. Rapid response vehicles will not be based at the Site.
15. The application includes change of use from gym to community space, external alterations related to the new use, new plant, new landscaping to resident podium level and associated works.
16. The proposal would comprise the following:
  - Basement: resident cycle and car parking and storage, and police parking and offices;
  - Ground floor: accessible bays, servicing, resident cycle parking, estate office, police parking and offices, and commercial parking;
  - First Floor: police office facilities, and resident gym;
  - Podium level: new landscaping and new garden room.

17. The scheme would result an overall floorspace uplift of 24 sqm GEA for the proposed garden room at podium level.
18. There would be a loss of retail as a result of proposals of 1,104 sqm GEA and loss of gym use of 198 sqm GEA.
19. The proposals would provide the following floorspace:
  - Police facility (sui generis) – 4,380 sqm GEA; and
  - Estate facilities / community use (Use Class F2) – 198 sqm GEA.
20. The proposal also includes associated works to Gravel Lane including landscaping with bollards and planting and associated highway works including amendments to parking bays.
21. The existing redundant first floor car park is proposed as Eastern Base accommodation and is located below the podium/garden level. As a result, the Applicant is proposing to replace the current failed waterproof membrane and to install insulation for on the Podium slab above. This results in a change of levels at podium level and results in proposed new landscaping at podium level with a new raised datum level established for the central part of the podium. The podium is proposed to be raised by 370mm.
22. There would be external changes as a result of proposals, principally to the existing Gravel Lane and Artizan Street elevations and landscaping changes to podium / garden level.
23. Amendments to the scheme have been made from the original submission to respond to comments received which includes: internalising a proposed external flue; amendments to podium level design to improve accessibility; and revised design to bollard and planter layout on Gravel Lane.



**Image 4:** Visual for Gravel Lane including landscaping





**Image 5:** Proposed visual for podium/garden area, south-east view



**Image 6:** Proposed visual for podium/garden area, south view

## **Consultation**

### **Statement of Community Involvement**

24. The Applicants have submitted a Statement of Community Involvement (SCI) outlining their engagement with stakeholders between January and July 2023. In addition, the applicant states that prior to this current consultation, a series of surveys, door-knocking and public meetings took place in 2022 as part of a statutory consultation process as part under Section 105 of the Housing Act.
25. The SCI states that the current public consultation has included a public meeting, resident workshops and walk-arounds, the formation of a Community Steering Group, and regular letters to residents and updates to the project. The applicant states that reports collating resident feedback have been produced throughout the process and shared on the project website and at consultation events.

26. There was a public exhibition on 24 May 2023 and the local community was invited to view the proposed plans and provide comments. Invitations were sent to 666 addresses in and around the Estate, posters were placed around the Estate, messages were posted on resident association Whatsapp groups and emails were sent to people who have signed up for updates and letters sent to political stakeholders.
27. The applicant states that the design aspects covered by the consultation included the podium redesign and refurbishment, the basement, ground floor and first floor car park areas, the frontages of Artizan Street and Gravel Lane, the usage of Unit 20 Gravel Lane and the impact that the works will have on service charges and utilities for the residents of the estate.
28. The SCI highlights a range of issues that were raised by residents including for operational use and impacts, the raised podium, security, current police use, noise and disruption, construction, and parking management.

#### Statutory Consultation

29. Following receipt of the application, it has been advertised on site and in the press and has been consulted upon in accordance with article 15 of the Development Management Procedure Order (as amended). Copies of all received letters and emails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the table below.
30. In accordance with the SCI, notification letters were sent to residential properties in the vicinity in addition to the site and press notices as set out above.
31. Following comments received, the proposals were revised and additional information provided. Therefore two subsequent re-consultation periods took place.
32. A total of 74 objections from the public were received. Table 1 below summarises the public consultation responses received and the corresponding Officer responses. The public objections received included representations received from the Petticoat Square Holders Association and the Middlesex Estate Residents Association.
33. A representation in support and one neutral comment was received from a member of the public.
34. The applicant has provided detailed responses to matters raised in consultee and third-party responses.

| <b>Table 1: Public consultation responses</b>   |   |
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| <b>Issue</b>  | <b>Officer response</b>   |
| Impact to residential amenity of proposed police use and sirens   | <p><i>There will be no rapid response vehicles at the site.</i></p> <p><i>The 'Environmental Impacts' are considered further in the report including operational impacts from the proposed use. Officers propose a number of conditions to mitigate impacts to residential amenity.</i></p>   |
| Traffic impacts including road and pedestrian safety and turning spaces   | <p><i>This is considered further in the 'Transport' section of the report.</i></p>  |
| Loss of retail  | <p><i>This is addressed in the 'Proposed uses' section of the report.</i></p>   |
| Residential amenity impact from disruption from new plant   | <p><i>The 'Environmental Impacts' are considered further in the report including operational impacts from the proposed use. Officers propose a number of conditions to mitigate impacts to residential amenity.</i></p>   |
| Disruption from existing police use and existing plant and fans from basement   | <p><i>The 'Environmental Impacts' are considered further in the report including operational impacts from the proposed use. Officers propose a number of conditions to mitigate impacts to residential amenity.</i></p> <p><i>No formal complaints have been recorded by the Environmental Health team for the existing use.</i></p> <p><i>Regarding the fans/plant, the Applicant has confirmed these will be designed to acoustic requirements and that they are aware through attendance of the Community Steering Group meetings of residents' issues with the existing ventilation systems and any retained fans in this area will be checked and upgraded as necessary to overcome the current noise issues. Conditions are recommended to control plant noise in line standards.</i></p> |
| New podium design and accessibility issues including changing existing routes, and loss of level access due to raising of podium, safety issues | <p><i>The applicant has amended design to improve accessibility and this now includes ramps at each side of the proposed raised podium.</i></p> <p><i>The Access officer has reviewed and this is considered acceptable subject to conditions.</i></p> <p><i>Further design details would be required through condition to ensure the highest levels of accessibility.</i></p>  |
| There is an increased security risk for the proposal to the Estate  | <p><i>The proposal is considered to improve security due to the police presence. The Applicant has confirmed that the threat level would not be considered high.</i></p>  |

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| <p>Temporary loss of access to podium</p>  | <p><i>The 'Environmental Impacts' are considered further in the report including operational impacts from the proposed use. Officers propose a number of conditions to mitigate impacts to residential amenity. Construction works will inevitably affect access to parts of the estate for a temporary period and Officers recommend a respite area during construction.</i></p>   |
| <p>Redevelopment of the podium/garden and removal of existing podium greening and mature plants, less play space, risk to children and disabled people, noise from activity, and loss of privacy</p> | <p><i>Regarding privacy, there is currently no planting around the base of the Tower. New planting beds will provide planted buffer for screening and prevent access to windows. Planting bed width 4.0m fronting the community space and 2.2m fronting the ball court. The new buffer planting is to be added to address residents' concerns over screening and prevent people walking directly in front of apartment windows.</i></p> <p><i>There is existing seating at podium level therefore impacts are considered to remain as existing. A condition is recommended for the final details for landscaping which would also include details of how residential impact has been considered within the proposed design.</i></p> <p><i>The Applicant confirms that Petticoat Tower is separated from the raised amenity space by new planters which act as a buffer zone. The windows to the apartments at the base of Petticoat Tower have solid spandrel panels at low level with the glazed windows starting at approximately 1100mm above the current podium.</i></p> <p><i>Existing playspace floor area = 88m<sup>2</sup>, and proposed playspace floor area = 97m<sup>2</sup> which represents an increase. In addition, the Applicant confirms additional equipment would be provided.</i></p> <p><i>The existing and proposed planting is addressed in the 'Sustainability' section of the report. A condition is recommended to retain existing planting where possible.</i></p> |
| <p>Residential windows below floor level and any new podium surface touching will cause damp</p>   | <p><i>Regarding damp, the Applicant states that these planters will be constructed of brickwork built against the existing face of the Petticoat Tower brickwork. This detail is to be developed at detailed design and the Applicant states will include vertical damp proofing and separation membranes to avoid any damp transferring into the masonry of Petticoat Tower. The Applicant further states that the windows and solid spandrel panels are also set back from the existing face of the Tower by approximately 150mm creating additional space between the new planter walls and the window screen eliminating any risk of damp in the apartments.</i></p>  |
| <p>New corridors and windowless passages reduces sense of safety</p>   | <p><i>In reference to the new circulation routes created each side of the ground floor compound, there will be covered by new CCTV cameras included as part of the upgrades proposed to the residential areas for enhanced security.</i></p>  |



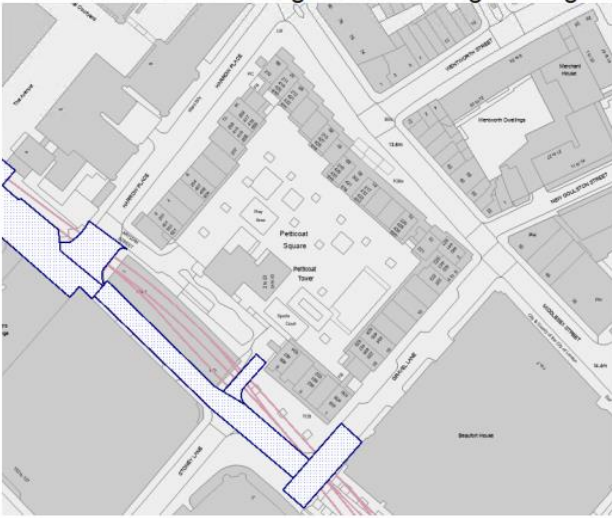
|   |  |
|---|--|
|   | <p><i>This is secured by condition. Both of these circulation routes are a minimum of 2300mm wide and are to enable refuse bins to be brought from existing stores to the collection points in the new service yard area. These spaces currently have no windows or surveillance and require residents to walk through areas where vehicles manoeuvre. The applicant states that by rationalising the ground floor to a service space (deliveries and refuse collections) and putting all the residents' car parking in to the enhanced basement area, there is a significantly reduced need for residents' to use these ground floor circulation spaces other than occasional access for those who live on the Gravel Lane side of the Estate to bring items to the ground floor recycling area.</i></p> <p><i>The Applicant states that a new 'link corridor' has been added at the request of residents' in the basement to connect their new car park to the Middlesex Street stair core (running behind the Eastern Base compound). This will be a secured by access control entry doors with CCTV coverage of both the entry point and the corridor.</i></p> |
| <p>New plant systems are not sustainable</p>  | <p><i>Addressed in 'Sustainability' section of the report.</i></p>   |
| <p>Construction disruption including from recent heating project and mismanagement of previous projects</p> | <p><i>This is considered further in the 'Environmental impacts' section of the report. A number of conditions are proposed to mitigate impacts to residential amenity. The previous construction impacts of unrelated works are not relevant to the consideration of this planning application however the environmental Scheme of Protective should seek to mitigate future works on site.</i></p>  |
| <p>Applicant lack of consultation and misinformation to residents, and undertaken during working hours</p>  | <p><i>Details of the consultation undertaken by application is included in the 'Consultation' section of the report.</i></p>   |
| <p>Fumes from new plant</p>   | <p><i>This is considered further in the 'Environmental impacts' section of the report. A number of conditions are proposed to mitigate impacts to residential amenity.</i></p> <p><i>In addition, the Air Quality Officer has reviewed the proposals and has no objection subject to recommended conditions.</i></p>   |
| <p>Increasing security will result in more difficult exit for disabled and older residents</p>              | <p><i>The applicant has confirmed that the works proposed to the existing entrance doors into the estate to improve their security comprise omitting the current PIR detection (that unlocks the doors as someone approaches) to a push to exit button and that this avoids unwanted unlocking of the doors by people in the stair core (compromising security) but would not introduce any features that will make it more difficult for people to use these entrances.</i></p>   |

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|   | <p><i>For those using vehicles the current entry control principles will remain for opening gates and barriers (ANPR or similar) just the gates and barriers will be more robust and not repeatedly fail as currently occurs.</i></p> <p><i>A condition is recommended for an Access Management Plan to be submitted and approved.</i></p>  |
| Changes to architecture of estate   | <p><i>There are limited external building design changes as a result of the proposal. This is addressed further in the 'Design' section.</i></p>  |
| Violation of the lease due to changes to rights to use parts of building and increases in service charge. Cost heating system will increase as a result of removing commercial premises from this | <p><i>This has been passed onto the Applicant to resolve. The existing lease arrangements are not a material consideration and should be discussed directly with the Applicant.</i></p> <p><i>The Applicant states that the commercial units that are being replaced with CoLP accommodation will not be using the communal heating system therefore will not generate additional cost.</i></p>   |
| Disruption to business / loss of retail   | <p><i>Addressed in the 'Loss of retail' section of report.</i></p> <p><i>This is considered further in the 'Environmental impacts' section of the report. A number of conditions are proposed to mitigate impacts to residential amenity.</i></p>   |
| Encasement of one of the characteristic chutes  | <p><i>The Applicant confirms that following feedback from residents and officers during the consultation period, the route of the new generator flue has been revised and the originally proposed cladding enclosure around both the flue and existing refuse chute has been omitted. Therefore, no change is now proposed to the external appearance of the stair cores with their external refuse chutes.</i></p>   |
| Request for large lockable green house that we can use for the plants to save   | <p><i>A condition is recommended for the applicant to seek to retain existing plants where possible and with details to be submitted.</i></p>   |
| Not suitable location for use with no benefits for residents  | <p><i>The Applicant has confirmed that alternatives were considered and discounted for a range of reasons including structural, security and location requirements.</i></p> <p><i>The Community and Children's Services Committee met on 23 January 2023 and resolved that identified spaces at car parks and seven shop units in Gravel Lane were surplus to housing need.</i></p> <p><i>The proposal would deliver a number of additional amenities for the exclusive use of residents including new including cycle parking facilities, a garden room at podium level, a resident gym at first floor and an estate office at</i></p> |

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|  | <p><i>ground.</i></p> <p><i>Conditions are proposed to mitigate impacts to the amenity of residents.</i></p>   |
| Not enough cycle storage for all                                 | <i>The proposal maximises cycle parking within the existing constraints of the building. New and improved provision exceeds policy requirement for an application of this type. This is addressed in the 'Transport' section of the report.</i>  |
| Loss of resident car parking and storage facilities              | <i>The proposed number of residential car parking exceeds the current allocation of permits and the improved car park management measures proposed by the applicant will prevent unauthorised car parking. This is addressed in the 'Transport' section of the report.</i>   |
| Health and wellbeing impacts of construction and operational use | <p><i>This is considered further in the 'Environmental impacts' section of the report. A number of conditions are proposed to mitigate impacts to residential amenity. The applicant should provide details of a respite area during construction works as part of environmental scheme of protective works that would be required to be submitted.</i></p> <p><i>The recommended conditions relate to the operational and construction phases of the development.</i></p> |
| Impact to on-street parking                                      | <i>Surplus car parking to the number of formal permits issued would be re-provided on site. Existing number of permits will be retained and this is secured by condition. The Applicant has confirmed that an improved car parking management strategy will be in place.</i>   |
| Ground floor large item bin access removed                       | <i>The Applicant has confirmed that this cage is retained and will remain accessible from the new service yard space for residents' to use, along with the re-organised recycling bins area. The Applicant notes that use of these two recycling areas is the only reason residents will occasionally need to access the ground floor service yard area.</i>   |
| Existing police parking on Artizan street on double yellow lines | <i>The proposed facility would enable police parking internally therefore would result in less on street parking as currently is the case.</i>   |

35. Table 2 below highlights the external consultation responses received and officer responses:

| <b>Table 2: External Consultation responses</b>                                 |   |
|---|---|
| <b>Greater London Archaeological Advisory Service (GLAAS), Historic England</b> | Confirmed the application lies in an area of archaeological significance. Concluded that as no below ground works are proposed, the proposal is unlikely to have a significant effect on heritage assets of archaeological interest and no further assessment or conditions are considered necessary. |

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|  | <b>Officer response:</b> Noted.  |
| <b>Health and Safety Executive</b>     | <p>Following a review of the information provided in the planning application, HSE is content with the fire safety design relating to the project description, to the extent that it affects land use planning.</p> <p>HSE made a number of recommendations including for a retrospective fire strategy for the whole of Petticoat Square, installation of wet fire mains, improved fire service access and firefighting facilities, provision of firefighting lifts, installation of sprinkler systems, external wall system and fire hydrant details. These comments have been passed onto the applicant to address and are outside the remit of this application.</p> |
| <b>Lead Local Flood Authority</b>      | Responded to confirm no comments.  |
| <b>London Borough of Tower Hamlets</b> | <p>No objection, subject to the City of London being satisfied that the loss of parking and the new delivery and servicing arrangements would create no unacceptable impacts on the capacity and safety of the highway network.</p> <p><b>Officer response:</b><br/>Addressed in the 'Transport' section of report.</p>  |
| <b>London Underground</b>              | <p>No objection in principle. Identified a number of potential constraints on works to a site situated close to London Underground (LU) infrastructure and stated that highways in this area and over LU structures are registered as Streets of Special Engineering Difficulty (SED) with the local authority under the New Roads &amp; Street Works Act 1991 – Section 63. The blue dotted area highlights streets of engineering difficulty below. Recommended condition.</p>  <p><b>Officer response:</b><br/>A condition is recommended.</p>                                    |

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| <b>Thames Water</b>         | No objection. Recommended informatives.  |
| <b>Transport for London</b> | <p>Commented the following:</p> <ol style="list-style-type: none"> <li>1. Queried whether the applicant is proposing additional signage for the entrance to the basement, given there may be a rise in faster vehicles entering/exiting the site.</li> <li>2. Queried whether there a need for a change in the road layout on the City roads directly outside of the site, given that Harrow Place or Petticoat Square is a left turn only southbound directly outside the site, or whether police would just turn as they please given it may be an emergency.</li> <li>3. The proposal appears to be offering a surplus of residential car parking spaces within the site in comparison to the number of permits. Queried whether a reduction in this number of if can be more restrictive in the Parking Design and Management Plan.</li> </ol> <p><b>Officer response:</b></p> <ol style="list-style-type: none"> <li>1. No response police vehicles are proposed at the site. Currently the basement ramp has no rising arm barrier at the top and the new proposal would reinstate this barrier to both control exit speeds possible up the ramp (for both police and residents' vehicles) as well as give a clear visual warning to passing pedestrians that a gate is opening and a vehicle is approaching. In addition, traffic light controls will also stop vehicles being able to enter down the ramp if another is exiting for added safety. In terms of signage, the applicant proposes adding a headroom notice to stop taller vehicles proceeding down the ramp and no additional signage is considered necessary.</li> <li>2. The Applicant confirmed there is no emergency response activity other than under exceptional circumstances and therefore considers the existing route network suitable for making day to day patrols given the moderate number of vehicle trips expected. Stoney Lane and Wentworth Street (subject to market stalls) provide the most convenient routes to the main road network from which police vehicles can take the routes they need. Cutler Street (one way) is not accessible to Eastern Base other than on the return to base. Vehicles leaving the site via Artizan Street can turn left (West) or right (East) into Harrow Place. If vehicles go right up to Middlesex Street there are then routes available to the East to work through to the A11 to then head South, North East or West as required. The applicant states this may not be possible during market days so as an alternative turning left (west) in Harrow Place and left (south) again into White Kennett street enables vehicles to connect through via to Stoney Lane (West) on to the A1211 to head South, East or West. In addition, turning right (north)</li> </ol> |

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|   | <p>at the end of Harrow Place enables vehicles to go north and west along Cutler Street to then go across the Southbound A1211 carriageway (via Goring Street – westwards) to get on to the Northbound A1211 carriageway.</p> <p>3. The applicant responded that there is a modest level of headroom in the capacity of the permit parking area at the Estate as there are existing day to day operational needs for the residential and commercial tenants and that the proposed level of parking offers an appropriate balance between the number of permits currently issued, the observed levels of parking demand and the monitoring and enforcement of informal/unauthorised parking activity. The applicant confirmed that the current residents' parking permit system is being reviewed to address residents' concerns such as the current system does not allow carers attending at weekends to obtain passes to park, and following on-site surveys it became apparent the need to address accessible parking and carer/essential visitor needs on site. Therefore the applicant states the number of spaces required needs to be greater than the number of actual permits currently issued. This input has resulted in the proposals for 43 spaces in the basement (instead of the current 34 permits) to better reflect actual demand. In addition, the applicant states that as part of the updating of the MSE Management Plan to reflect the changes created by the Eastern Base, the role of a 'car park attendant' is proposed to better control use of the parking spaces and assist carers and essential visitors when arriving (particularly at weekends).</p> <p>Following the response from the Applicant, TfL confirmed no further comments.</p> <p>This is considered further in the 'Transport' section of report.</p> |
| <p><b>The City of London Archaeological Trust (CoLAT)</b></p> | <p>Suggested requiring an archaeological assessment to cover all excavations in and around the present structures.</p> <p><b>Officer response:</b> GLAAS reviewed and recommended that no assessment or condition was required due to no below ground works.</p>  |
| <p><b>The Gardens Trust</b></p>                               | <p>No response.</p>   |
| <p><b>Twentieth Century Society</b></p>                       | <p>No response.</p>   |

36. It is noted that all material planning considerations raised in the representations above are addressed within this report.

## **Policy Context**

37. 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 A to this report.
38. 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 A to this report.
39. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2023 and the Planning Practice Guidance (PPG) which is amended from time to time.
40. 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”.

## **National Planning Policy Framework (NPPF)**

41. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
42. 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.
43. For decision-taking this means:
  - a) approving development proposals that accord with an up-to-date development plan without delay; or
  - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
    - the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
    - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
44. 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).

45. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places. Paragraph 96 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.
46. Paragraph 97 states that planning decisions should provide the social, recreational and cultural facilities and services the community needs.
47. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 109 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*”.
48. Paragraph 101 states that planning decisions should promote public safety and should take into account wider security and defence requirements by:
  - a) *anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate... and the layout and design of developments, should be informed by the most up-to-date information available from the police and other agencies about the nature of potential threats and their implications. This includes appropriate and proportionate steps that can be taken to reduce vulnerability, increase resilience and ensure public safety and security; and*
  - b) *recognising and supporting development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.*
49. Paragraph 116 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.
50. Paragraph 117 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*”.
51. Chapter 11 of the NPPF seeks to achieve effective use of the land. Paragraph 123 advises that “*Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding*



*and improving the environment and ensuring safe and healthy living conditions.”*

52. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 131 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.”*
53. Paragraph 135 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.
54. Paragraph 136 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...”*.
55. Paragraph 139 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.
56. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.
57. Paragraph 159 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.
58. Chapter 15 of the NPPF seeks to conserve and enhance the natural environment. Paragraph 180 of the NPPF advises that planning policies and

decisions should contribute to and enhance the natural and local environment by, *inter alia*, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. It is also stated that development should, wherever possible, help to improve local environmental conditions such as air and water quality.

59. Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
60. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 201 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.
61. Paragraph 203 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.*"
62. Paragraph 208 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*".
63. Paragraph 209 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*".

### **Statutory Duties**

64. The Corporation, in determining the planning application has the following main statutory duties to perform:
- To have regard to the provisions of the development plan, so far as material to the application and to any other material considerations. (Section 70 Town & Country Planning Act 1990);
  - To determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).

### **Main Considerations**

65. In determining the planning application before you, consideration has to be taken of the documents accompanying the application, the updated information, the consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.
66. 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 plan as a whole the proposal does or does not accord with it.
67. The principal issues in considering this application are:
- a) The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.
  - b) The principle of development and proposed uses.
  - c) The impact of the proposed development on the amenity of nearby residential and other occupiers.
  - d) The impact of the proposal on public safety and security in the City.
  - e) The economic impact of the proposal.
  - f) The impact of the development on the character and appearance of the area and the design of the building itself.
  - g) The impact of the development on designated and non-designated heritage assets.
  - h) The impact of the development on public realm.
  - i) The impact of the development on ecology.
  - j) The accessibility and inclusivity of the development.
  - k) The impact of the development on any potential archaeological assets beneath the site.
  - l) The impact of the development on highway and transportation terms.
  - m) The impact of the development in terms of energy, sustainability and climate change.
  - n) The impact of the development on air quality.
  - o) The impact of the development on health and wellbeing.
  - p) The impact of the development on fire safety.
  - q) The impact of the development on flood risk.
  - r) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010).
  - s) The Human Rights Act 1998.

## **Principle of Development**

### **Police use**

68. The NPPF states in paragraph 96 that planning decisions should aim to achieve healthy, inclusive and safe places and provide social, recreational and cultural facilities and services the community needs.
69. Paragraph 101 of the NPPF states that planning decisions should recognise and support development required for operational defence and security purposes, and ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.
70. 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 workspaces, promoting higher density development; 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
71. London Plan Policy S1 states that development proposals should provide high quality, inclusive social infrastructure that addresses a local or strategic need, and that development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.
72. London Plan Policy D11 states that development proposals should maximise building resilience and minimise potential physical risks. The supporting text states that new developments, including building refurbishments, should be constructed with resilience at the heart of their design.
73. Local Plan CS3 states the importance of ensuring the City is secure from crime, disorder and terrorism which includes proactively managing night-time entertainment to minimise disturbance to residents and workers, and to ensure that development takes account of the need for resilience so that the residential and business communities are better prepared for, and able to recover from, emergencies.
74. The Site is within the 'Key City Places: Aldgate' policy area (CS8) which states proposals should regenerate the amenities and environment including for businesses, workers and visitors. This includes identifying and meeting needs of residents.
75. The Applicant is proposing a police facility for an 'Eastern Base' in the City to meet strategic operational requirements.
76. The Applicant states the east of the City contains significant demand for the CoLP with night time-related offences and highlights future development in the area will increase future demand. This strategic operational need in the east of the City is reinforced by the planned closure of Bishopsgate Police Station.

Therefore, there is a need for the City to maintain the high visibility presence and response. In addition, from a counter terrorism perspective there is key infrastructure such as transport hubs, crowded places and business premises. Therefore having a high level of police presence based in the east will complement the overall security posture, coverage and deployments across the Square Mile and enable Officers to be based near to highest demand areas. In addition, the proposed new base is also in close proximity to large residential populations including Middlesex Street and Golden Lane Estates.

77. The applicant states that the majority of the community-based teams patrol on foot or bikes therefore being based in the east of the city will be essential for visibility, quick response to calls for service and essential in reducing the fear of crime through good visibility of police in the local area.
78. In respect of activities, the applicant states this will include:
- The Eastern Base will be used by operational police officers from various Local Policing Teams who will muster at the base and then go out on patrol by foot and in vehicles to serve the community.
  - Office areas are not currently provided in the existing compound but will be created in the new Eastern Base to allow teams to carry out their administrative functions such as report writing.
  - The new Eastern Base will continue to provide vehicle parking for these teams, in similar numbers to the existing compound, which will be accessed via the existing ramp to the basement and service yard to the ground floor.
  - It will also provide police officers with storage areas for kit and equipment that is essential for their duties. Lockers and showers and associated welfare facilities will be incorporated in internal areas where they cannot be seen or overheard from residential areas.
  - Response vehicles are not included within the new facility and vehicles have been relocated to Salisbury Square.
79. The Applicant has confirmed that alternative sites were considered and discounted due to security and structural concerns, or because the City of London were not the freeholder, or because they did not meet location requirements. In addition, significant resources have already been invested into the site as a base for police vehicles following approval in 2019.
80. Therefore, the principle of the use is considered acceptable in this location subject to conditions.

#### Loss of retail

81. London Plan Policy E9 states that development proposals involving the redevelopment of surplus retail space should support other planning objectives and include alternative town centre uses on the ground floor where viable and residential development.
82. The site is not within a Principal Shopping Centre (PSCs) or retail links. Local Plan Policy CS20 states that importance of maintaining a scattered distribution of convenient local services elsewhere in the City by protecting existing retail facilities unless it is demonstrated that they are no longer required.

83. Local Plan Policy DM20.3 states development should resist the loss of isolated and small groups of retail units outside the PSCs and Retail Links that form an active retail frontage, particularly 'A1' units near residential areas, unless it is demonstrated that they are no longer needed. Officers note the change from Use Class 'E' in this case following legislation changes.
84. Supporting text for DM20.3 states that in many parts of the City, retail units are grouped together to form active retail frontages which comprise a mix of retail uses and provide valuable services. It states that when considering proposals for loss of retail uses, particular consideration will be given to the contribution that individual units make to the locality, having regard to:
- *the size of a unit and the length of its frontage;*
  - *the composition and distribution of retail uses locally;*
  - *the location of the unit within the identified frontage;*
  - *the length of vacancy and active marketing.*
85. The draft City Plan Policy RE3 states that the loss of convenience retail units that meet a local residential need will be resisted unless it is demonstrated that they are no longer required.
86. To facilitate the police facility and community space, the Applicant is proposing the loss of six retail units and one gym unit on Gravel Lane.
87. The Community and Children's Services Committee met on 23 January 2023 and resolved that identified spaces at car parks and seven shop units in Gravel Lane were surplus to housing need.
88. The Applicant has submitted a Town Centre Use Statement which considers the re-use of the six retail units and a gym unit on Gravel Lane. The assessment states that the demand for retail floorspace in the Petticoat Market area has decreased, which is evident by the number of shop unit vacancies (c25% compared to a national average of 14% in August 2022) and concludes that the implications of the loss of 6 x retail units (in an out of centre location) is limited, particularly in the wider context of around 140 retail units in the Petticoat Market area of which 35 units are currently vacant.
89. The assessment states there is a clear surplus of retail floorspace in the area and there is no longer a requirement for all the retail floorspace along Gravel Lane. In addition, none of the existing retail units provide a local convenience goods offer and with one specialist musical instrument shop.
90. The Applicant has confirmed that assistance has been provided to all tenants for relocation to an alternative premises on the estate or elsewhere, and has confirmed that the existing units have either been relocated, no longer at the premises or closed down business:
- 8 Gravel Lane (Accessories Zone) – relocating to unit on Middlesex Street;
  - 10 Gravel Lane (Smoking accessories) – relocated to a warehouse facility in East London;
  - 12 Gravel Lane – was vacant prior to the unit being declared surplus;
  - 14 Gravel Lane (Instrument shop) – tenant relocated to Whitecross Street;
  - 16 Gravel Lane (Printing shop) – tenant relocated to 88 Fenchurch Street;

- 18 Gravel Lane (Hairdressers) – tenant wanted to close the business;
  - 20 Gravel Lane (Gym) - tenant was no longer occupying the premises.
91. Paragraph 3.20.10 of the Local Plan that active frontages should include shops but other uses will be acceptable provided that an active frontage is retained. It states that where proposals to change from shops to other uses, particular consideration will be given to the contribution that individual units make to the locality.
92. Although there has been some relocation of retail units and active frontage is proposed through public art, the proposal is considered to be contrary to Local Plan policies CS20 and DM20.3, and draft City Plan Policy RE3, due to the loss of retail in proximity to residential uses and in the absence of active marketing and vacancy information for these units.
93. However, due to the provision of active frontage due to window design and the installation of public art on the Gravel Lane frontage, the wider provision of shops in the area, and the strategic operational need for the police use, the loss of retail is considered acceptable in this case.

#### Community uses

94. London Plan Policy S1 states that development proposals should provide high quality, inclusive social infrastructure that addresses a local or strategic need.
95. Local Plan policies CS22 and DM 22.1 support the provision of community services. It is advised that development of *“new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:*
- *where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;*
  - *in locations which are convenient to the communities they serve;*
  - *in or near identified residential areas, providing their amenity is safeguarded;*
  - *as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.”*
96. Similar requirements are set in Draft City Plan 2036 policies S1 and HL5.
97. The Applicant is also proposing redevelopment and reprovision of the podium/garden area which will include a new community room, a resident gym at first floor level, and an estate office at ground floor level to include meeting room and other facilities.
98. In addition, on Gravel Lane, there will be vitrines introduced into 'shop fronts' with approximately 800mm depth available for accommodating artwork and/or community history information to animate the street scene. The Applicant has confirmed that this will be curated and managed by an external specialist and would be secured by condition.

99. This complies with London Plan Policy S1, and Local Plan policies CS22 and DM22.1, and draft City Plan policies S1 and HL5 to provide social infrastructure as part of developments.

#### Conclusion for proposed uses

100. For the reason stated above, it is considered that the scheme meets the aims of policies in the Local Plan and London Plan and meets key strategic operational need of the police.
101. The police use is considered to be acceptable in this location due to need for a base in the east of the City and subject to conditions to mitigate impacts to residential amenity and wider area.
102. A loss of six retail units and a gym is proposed and it is considered to be contrary to Local Plan policies CS20 and DM20.3, and draft City Plan Policy RE3, due to the loss of retail in proximity to residential uses and in the absence of active marketing and vacancy information for these units. Although the loss of retail is not supported in principle, the applicant has demonstrated that this is acceptable in this case having regard to other material considerations in the context of this strategic operational police need. In addition, some active frontage would be retained on Gravel Lane through window design and public art installation.
103. Therefore, the proposal would support the main function of the City and the aims of the development plan and accord with the relevant planning policies, as stated above.

#### **Design and Heritage**

##### Design

104. Local Plan policies CS10 and DM10.1 and draft City Plan policies S8 and DE2 require a high standard of design of buildings, streets and spaces, and that plant and building services equipment are fully screened from view and integrated into the design of the building. Policy DM10.1 also requires developments to have attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the city's streets. Developments or installations that would adversely affect the character and appearance of buildings or amenities will be resisted. Local Plan Policy DM10.1 and draft City Plan IN1 require infrastructure to be designed into and integrated within development.

##### Gravel Lane

105. The proposals include a change of use from retail to a police facility, including the alterations to the existing shopfronts on Gravel Lane. The facades at ground floor level would be replaced, with an additional layer of glazing 600mm behind the existing frontage for security purposes. The second layer of glass would have a privacy film, obscuring views through into the office space behind. The void between these two layers of glazing would have artwork, this would contain historical photographs of the area or similar, which has been guided by



consultation with the residents and would be secured via condition. There would be a loss of active frontage as a result of the proposals, although, the designs have sought to replicate shopfront proportions, incorporating a fascia and stall riser to simulate the character and appearance of the existing shopfronts. The doors of each shop unit would remain in the same location. The proposed gym facility for residents would also have a shopfront design similar to the police station.

106. The proposed design and materiality of the shopfronts would reflect the existing arrangement, with the final details to be secured via condition. The windows at first floor level above the existing shopfronts would be replaced with details and specification to be reserved for condition.
107. The proposals for Gravel Lane would represent a degree of conflict with policy CS10 and DM10.1, and would lead to a reduction in the quality of the street. Gravel Lane currently has locally run shops with a character reflective of the wider estate, albeit of modest architectural quality. The existing shopfronts do contribute to an active and vibrant character of the street scene which would be diminished as a result of the proposed use, this is however considered to be inevitable as a result of the nature of the proposals.
108. The proposed use would make the street more private, by expanding the police facility from a basement car park into a larger car park with ancillary office facilities with a visible presence at ground floor level, the essence of the proposals is defensive and private by its nature. The installation of bollards would reduce the inclusivity and attractiveness of the environment and visual amenity of Gravel Lane. Policy DM10.1, new development, requires developments to be of a high standard of design, to avoid negative impacts to the townscape and public realm. The architectural move to 'echo' the design of the existing shopfronts is appropriate and sensitive to a degree, maintaining the proportions and arrangement of the façade is positive, however, the secondary glazing and reduction of active frontage, compounded by the loss of public access would reduce the vibrancy and vitality of the street in a residential neighbourhood with a distinct community feel. The design, materiality and installation of artwork are appropriate attempts to mitigate the impact of the proposed use, however, it is the function and essence of the proposed use, an expanded police facility and its security requirements, which would represent non-compliance with the City of London Plan design policies by diminishing the function, visual amenity and vitality of the street scene. This is however considered to be justified on balance, and is considered inevitable given the nature of the proposals.
109. The prevalence of the security requirements would be evident, the loss of active frontage, obscured secondary glazing and security bollards would diminish a public facing, residential, local to street. Policy CS3 of the local plan, security and safety, seeks to ensure security requirements are well integrated into the design of buildings, streets and spaces. The environmental impact of the security measures is considered to be negative. Along Gravel Lane, the proposals would visually segregate publicly accessible pedestrian areas when compared to the existing street scene. The bollards and security compliant planters to provide soft landscaping would be secured through condition and delivered by the highways authority. This aspect of the proposals is indicative

at this stage, the designs of the security features on public highway, including layout and materials, would be subject to a detailed assessment and negotiation with the highways authority at a later stage of the project on the specific design of the proposals.

#### Artizan Street Elevation

110. The elevations on Artizan Street would be altered. The vehicle ramps which have previously been removed would be infilled with brick cladding enclosures, louvres and a new concrete 'fascia' extending over the existing vehicle access. The brick specification and colour would be agreed through condition and would be specified to match the existing brick. The choice of concrete and louvres would tie in with the wider aesthetic of the estate. The louvres are required for ventilation for the plant equipment behind. The car park entrance at ground floor level would be closed off with new gates and barriers, details of which would be agreed through condition. As such, the proposals would tidy up the Artizan Street Elevation.
111. Policy DM10.1 states plant and building services equipment should be well executed and integrated into the façade design. The louvres would be prominent, but are generally an improvement on the existing elevation. Brick slips have been proposed, as there are however structural and loading constraints to substantially revising the design of the overall elevation. The projecting elements of the façade (covering the previously removed vehicle ramps) and the louvres would be functional in appearance. The proposals are an improvement on the existing elevation and are therefore considered to be compliant with policies CS10, DM10.1 and DM10.4.

#### Landscaping at podium level

112. The central area of the podium level, the residents garden, would be re-designed and re-constructed. The area would be raised to accommodate the police station beneath, allowing for waterproofing and security protection for the office accommodation of the police facility. This would be a 370mm increase in height of the central area, with a 'corridor' for pedestrian access around the edge, the edge spaces would remain at the same level of the existing terrace allowing for access in and out of residential apartments.
113. The landscaping proposals include the provision of a community room, greening, a new playspace and a sunken garden. The seating and planters would be finished in concrete ceramic tiles and bricks, intended to match the existing aesthetic of the estate. The proposals are considered to be compliant with policies CS10, DM10.1 and DM10.4, subject to appropriate materials being agreed through condition.

#### Conclusion

114. There would be a degree of visual impact by expanding the existing police facility within the Estate, specifically relating to the proposals on Gravel Lane, including the elevations of the building. By virtue of their impact on Gravel Lane the proposals represent some non-compliance with Local Plan policies CS10, DM10.1, but are on balance considered to be justified and are an inevitable

consequence of accommodating a police facility. The detailed design conditions would further seek to mitigate any visual impacts and refine the delivery of the proposals,

### Heritage

115. Local Plan policy CS12 and DM12.1, draft City Plan policies S11 and HE1 and London Plan Policy HC1 seek to conserve heritage assets and the historic environment.
116. Local Plan policy CS2 and draft City Plan policy S7 requires utility infrastructure to promote “the improvement and extension of utilities infrastructure that is designed and sited to minimise adverse impact on the visual amenity, character and appearance of the City and its heritage assets”.

### Non-Designated Heritage Assets

117. On a previous application for the site (21/00527/FULL), the Twentieth Century Society suggested the Estate should be identified as a non-designated heritage asset. Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions because of their heritage interest but which do not meet the criteria for designated heritage assets (as defined in Annex 2 of the NPPF).
118. The Estate has not been identified by the City of London as a non-designated heritage asset as it is not considered to meet the Historic England criteria set out in ‘Local Heritage Listing: Identifying and Conserving Local heritage’. These criteria comprise: rarity; architectural and artistic value; group value; archaeological interest; historic interest and landmark status.
119. Rarity: Built in 1965-1970 for the Corporation of London, Middlesex Street Estate comprises the 23 storey Petticoat Tower and low-rise buildings. There are numerous examples of social housing estates across London from this building period.
120. Architectural and Artistic value: The materials are concrete including for balconies and engineered brick. Pevsner in The Buildings of England describes the building as “aggressive” and “very hard and very urban even for the standards of the time”. In comparison it is considered that other London estates of this period are more complete, architecturally accomplished and expressive.
121. The Estate is an exponent of modernist brutalism and represents many of the values which define the architecture of this period supporting the welfare state and representing a new optimism as well as being fortress like and inward facing. The Estate includes a mix of uses which typifies the streets in the sky concept and includes courtyard blocks and a tower with shop units on the lower floors a large garage underneath and a central elevated landscaped podium surrounded by a mix of flat types. Architecturally the building has a robust and formal language and rhythm of slotted concrete balconies which contrast with the dark engineering brick work. The muscularity of the building contrasts with

the raised podium communal space which promotes social interaction, includes gardening, planting and playground space.

122. Alterations have eroded the quality, architectural coherence, expression and design intentions of the Estate. Original business units facing outward at street level and into the podium are no longer functioning and converted to residential (approved 09/004466/FULMAJ). Public access to the elevated podium connecting through to the City of London Pedway scheme has been closed. An application for full height glazed enclosure was approved for the Harrow Place/Artizan Street south-western corner to create a private and secure main entrance into the estate along with other security measures to access points (approved 11/00602/FUL3).
123. Group value: The Estate is in a varied and constantly evolving urban landscape comprising diverse buildings and varied architecture. There are no discernible group value connections with the surrounding townscape.
124. Archaeological interest: There are no significant archaeological connections.
125. Historic value: The development is an example of social housing and post war development in the local area but has no readily legible historic connections with the past which provide evidential values.
126. Landmark status: The development is distinctive architecturally in the local townscape and as a housing estate rather than commercial use. Petticoat Tower is a recognisable marker for orientation however it is now less impactful and is appreciated in the context of the background taller buildings on the fringe of the City Cluster. The development is not considered to have a landmark status.
127. The Estate is not considered to warrant non-designated heritage asset status as the Estate does not meet the criteria due its architectural quality compared to other similar estates and the erosion of original design intentions. It is however distinct architectural typology, the Podium level promotes urban greening, there is a strong sense of community and as a complex the Estate importantly contributes to the City's residential population.

#### Other Heritage Impacts

128. There are no designated heritage assets within the City of London that would potentially be impacted by the proposals. The closest City of London listed buildings are within the Cutler Street Estate including Cutler Street House to East of Entrance to Port of London Authority's Warehouses; and Cutler Street Port of London Authority Warehouses and Boundary Wall to Middlesex Street and New Street both grade II listed. Due to the intervening buildings along Harrow Place and the incidental nature of the proposals, there would be no impact upon the setting and significance of these designated heritage assets. There are no City of London conservation areas nearby where the proposals would be visible from.
129. Wentworth Street Conservation Area within Tower Hamlets lies immediately to the east of Middlesex Street Estate sharing a boundary with Middlesex Street.

This an area with a fine urban grain which special architectural and historic interest due to its rich history dating from 19th century. The area has a medieval street pattern of yards and alleys which is still evident. The area is characterised by markets and associations with the clothing industry and wave of immigration which make it a culturally diverse part of London.

130. The proposed works would be visible in views away from and into the Conservation Area boundary, there would some visibility of the Gravel Lane and Artizan Street elevations. The proposed elevations would represent a variation on the existing condition. In addition. due to the overall scale of the estate and the position of the interventions, any visibility of the proposed works would be incidental and absorbed into the architecture, materiality and detailing. In views along the Middlesex Street the brutalist Middlesex Street Estate is within the setting of the conservation area but is entirely detached and self-contained from the conservation area's fine urban grain and Victorian character. The setting of the Wentworth Conservation Area and its the overall character, appearance and significance of the Conservation Area would be preserved.

#### Conclusion on Heritage

131. As the Middlesex Street Estate is not considered to meet the criteria to be identified as a non-designated heritage asset, there would be no impact in this respect. The proposals would preserve the character, appearance and significance of the Wentworth Street Conservation Area, the only designated heritage asset identified as having the potential to be impacted by the proposals. As such, the proposals are considered to accord with Local Plan Policies CS 12 and DM 12.1, emerging City Plan policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs.

#### Archaeology

132. The proposed development is in an area of archaeological interest. In accordance with the City of London Local Plan 2015, 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.
133. The Applicant has confirmed that no below ground works are proposed. The Greater London Archaeology Advisory Service were consulted and confirmed no assessment or conditions are required.

#### Access and Inclusivity

134. 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. In particular, policy DM10.8 requires developments to achieve an environment that meets the highest standards of accessibility and inclusive design in all development (both new and refurbished), open spaces and streets.

135. The application is accompanied by an Access Strategy submitted as part of the Design and Access Statement.
136. To avoid the new Eastern Base facility impacting on current pedestrian circulation routes in the Estate, the Applicant has provided dedicated entrances through the units on Gravel Lane. The Unit 18 entrance will form the main entry and exit point for all Eastern Base staff, whilst the door to unit 8 will provide a secondary exit. This will ensure that residents' stair cores will remain solely for their use.
137. The applicant is proposing relocating the existing blue badge space on Gravel Lane and will provide two spaces at ground and one at basement. There is potential for four additional future spaces at basement. There will be no loss of existing disabled car parking as a result of the proposal.
138. The Access Officer reviewed the application highlighted the following to be addressed through condition:

#### Gravel Lane

- Need to ensure that there is level access from the Blue/Red badge bay opposite through to the entrance core. Location of dropped kerbs should not be obstructed by bollards/planters.
- Recommended condition to ensure that disabled parking provision is maintained throughout construction.
- For seating points proposed on planters outside the bakery, these should be a range of heights with arm and back supports.
- Where display material is to be shown in the shop windows this should avoid glare and be consistent with guidance on signs/ information boards in BS 8300 (2): 12. It would be welcome if exhibits are provided in alternative formats that are consistent with the principle of more than two senses (PAS 6463).

#### Podium

- A range of seating is most inclusive including options for single, and grouped seats and seating and tables to be secured by condition.
  - Details for inclusive play to be provide by condition to ensure that there is provision for a range of users.
139. The podium level design has been amended following comments from residents and the Access Officer, to provide ramped access at each side of the proposed podium raised area.
140. Therefore, subject to the requirement to provide an accessibility management plan via condition and to provide further design details, the proposal is considered acceptable.
141. The planning application has been assessed 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.

## **Highways and Transportation**

### **Site and Connectivity**

142. A number of underground stations that include Aldgate station, Liverpool Street station and Aldgate East station are within easy walking distance to the site. Fenchurch Street and Liverpool Street train stations are within walking distance to the site. A number of bus routes also operate close to the site.
143. The Public Transport Accessibility level (PTAL) of the site is 6b which is the highest level of accessibility.

### **Trip Generation and Impact**

144. The applicant has undertaken traffic surveys to record existing vehicle activity into and out of the site. Traffic surveys were undertaken between 06.00 and 18.00 hours on Friday 1st July 2022 and Saturday 2nd July 2022.
145. The surveys recorded 49 two-way private car movements 3 police car movements, 48 two-way LGV movements, 5 two-way motor bike movements and 14 two-way cycle movements on Friday 1st July 2022.
146. On Saturday 2nd July 2022, 58 two-way private car movements, 2 police car movements, 6 two-way LGV movements, 2 two-way motorbike movements and 4 two-way cycle movements were recorded.
147. Traffic surveys were also undertaken on Thursday 18th, Saturday 20th and Tuesday 23rd May 2023. These traffic surveys were undertaken between 07.00 hours and 19.00 hours.
148. On Thursday 18th May 2023, 67 two-way car movements, 10 two-way police vehicle movements, 43 two-way LGV movements and 23 two-way motorbike movements were recorded.
149. On Saturday 20th May 2023, 56 two-way car movements, 7 two-way police vehicle movements, 6 two-way LGV/HGV movements and 4 two-way motor bike movements were recorded.
150. The applicant makes reference to the Tuesday 23rd May 2023 surveys; however, the applicant has not produced a table similar to the Thursday and Saturday surveys, as there were fewer vehicles recorded on this day. During this day a total of 146 two-way vehicle movements were recorded.
151. The Police has provided information regarding shift patterns across a typical day and the associated number of personnel.
152. The proposals incorporate 5 teams that would operate from the Eastern Base, with different shift patterns and there will be 24 vehicles associated with these teams; 18 of these vehicles will be in operation on a 24-hour basis across the City. The Applicant night time shift patterns provide a lower number of officers attending the facility.

153. Vehicles would arrive / depart the site upon inception and cessation of specific shifts. Police officers travelling to / from the site from home would travel by public transport.
154. It is expected there will be up to 6 vehicle movements during a 30 min period either side of a shift. The vehicle movements are dictated by shift patterns.
155. A further 6 vehicles (associated with the dog handlers) would enter and exit on an ad-hoc basis across the day only. It is also expected that there will be 9 motorcycles in use during the core part of the day. It is noted that the existing site already generates some vehicle movements and the expected vehicle trips are therefore not considered to be severe.
156. In summary, the relocation of the CoL Police to the Eastern Base will moderately increase vehicle movements in the area. However, the increase in trips is not expected to be significant and can be accommodated on the existing local road network. These trips would also not be new trips on the wider CoL road network, as they would represent displaced trips. Therefore, there will be no overall increase in vehicle trips within CoL area.

#### Vehicle Access

157. The main entrance to the building is from Artizan Street and will continue to provide the main entrance and exit point to/from the ground and basement level.

#### Pedestrian Access

158. Pedestrian access to the proposed police facility will be from the site frontage on Gravel Lane with two access points located at either end of the site's frontage, an emergency escape at Middlesex Street end, and a main entrance at the White Kennet Street end.

#### Car parking

159. The existing development provides 67 car parking spaces for the residents, 38 of these are located at basement level and 29 at ground floor level.
160. An area of approximately 2,100 sqm at basement level, is used at present by the CoL Police as a secure parking area, which is approximately half of the basement level.
161. It is proposed to reduce the number of car parking spaces used by residents to 43 (a reduction of 24 car parking spaces) and increase the number of car parking spaces of the CoL Police to 52 car parking spaces. The residents parking area would be improved as part of the proposals via the introduction of CCTV, new surfacing, better access control and vehicle charging points (7 chargers will be installed in the resident area, with 'passive provision' for an additional 7 bays to be easily converted in the future).
162. Overnight car parking surveys were undertaken by the applicant across three days and the results of these surveys indicated that a maximum of 43 car parking spaces were occupied before 06.00 AM. On the other survey days, a



maximum of 41 and 40 vehicles were recorded, which is consistent and therefore provides assurance with respect to the reliability of the results. Of these 43, 41, and 40 vehicles, 20, 27, and 26 respectively could be identified as being permit holders; it is understood that 34 resident parking permits are in circulation in total and this current allocation of spaces for residents would be maintained as part of the proposals.

163. Based on the results of the surveys, the applicant considers that the reduction in resident parking will not adversely affect the operation of the car park as the recorded maximum demand for private car parking would be provided for, and this would be in excess of the number of identified permit holders (+11 in circulation and +17 as recorded in the maximum parking surveys).
164. The applicant has confirmed that all existing permits for off-street car parking will be retained. A condition is recommended to ensure that existing permits are retained as currently allocated.
165. The existing Blue Badge parking space on Gravel Lane is to be retained and relocated.

#### Motorcycle Parking

166. The existing development accommodates 7 resident motorcycle parking spaces, and the applicant is proposing to re-provide these spaces. In addition, 6 motorcycle spaces are proposed for the use of the CoL Police.

#### Cycle Parking

167. The proposals do not involve alterations to the number of residential properties therefore, no additional cycle parking would be required per policy. However, the applicant is proposing to increase the number of cycle parking spaces and improve the cycle parking facilities (notably for accessible users), and this is welcomed.
168. There are currently there are 26 cycle spaces within the Ground floor service yard and a further 24 cycle spaces externally at podium level which require bicycles to be taken into the residential lifts.
169. It is proposed to provide 44 cycle parking spaces within the police compound. For the commercial units, 24 cycle parking spaces are proposed at ground floor level.
170. For the residential element, a new storage area is proposed for up to 205 cycle parking spaces at basement level. In addition, 11 wider space / adapted cycle bays provided in a separate secure area at ground level next to the loading bay with new dedicated cycle lifts to basement level. This provides approximately 5% of total cycle parking as accessible.

#### Servicing and Waste Area

171. The delivery and servicing area will be maintained at ground floor level. Three spaces are for standard cars, 2 spaces are for light goods vans and two 3mx10m bays will be provided for larger vehicles.

172. The applicant has undertaken a servicing vehicle survey, which shows 12 vehicles per day were undertaking servicing / deliveries and this includes 2 visits for refuse vehicles.
173. Swept Path Analysis (SPA) is referred to within the Transport Statement, and confirms that the required vehicle movements can be made.
174. Based on the results of the surveys, it is considered that the servicing arrangements are adequate in principle and are accepted. A detailed Delivery and Servicing Plan should be submitted to and approved by the LPA , secured by condition.

#### Highways Improvement Works

175. Highway improvement works are proposed along the section of Gravel Lane fronting the site. The proposals are indicative only and subject to review during the design process. The works proposed include (but are not limited to) partial footway widening to maintain an improved road alignment and footway width. The works require the relocation of an existing on street disabled bay to the south and changes to on-street car parking. Final Highway designs would be subject to the undertaking of a Road Safety Audit (Stage 2).
176. The proposed removal of pay and display will incur a loss of revenue to CoL and any loss in revenue would need to be covered by the Applicant. As the bays are designated public highway, the potential removal of bays would be subject to the necessary consultations and traffic orders.
177. The highways improvement works indicates a large number of bollards located within the public highway, combined with planters incorporating soft landscaping and seating areas. A balanced design will have to be agreed during the design stage and the proposed arrangements would be required to avoid any intervisibility safety issues (drivers x pedestrians). The design is subject to a road safety audit prior to final approval of the scheme of highway works.
178. Within the initial submission, it had been noted and acknowledged by the applicant that doors were proposed to open outwards onto the public highway. This is a contravention of the Section 153 of the Highways Act 1980 and adds further liability to the highways authority. The applicant reviewed the design to accommodate the opening of the doors inwards. No doors are to open within the public highway under any circumstance and a condition is recommended.
179. The proposed width of the carriageway has been shown as 4.8m. It is proposed that the vehicle/Service Access to Beaufort Place is maintained. Widening the footway and realigning the kerblines does not appear to maintain two-way traffic, when taking into consideration the existing on-street parking arrangements/restrictions. Reversing onto the highway to allow other vehicles to pass is likely to occur and would therefore compromise road safety.
180. The applicant states that the service yard at Beaufort House is limited to vehicles of 7.5t in weight and has provided SPA drawings demonstrating access on this basis.

181. Removing the “inset” area may not allow larger vehicles to safely exit the service area (Beaufort House), without manoeuvring/overrunning the highway. The applicant has demonstrated, using swept path analysis, that such vehicle movement is possible however, it seems limited. Further discussions at detailed design phase will be required to establish the feasibility of the proposals to ensure that overrun and damage to street furniture does not occur.
182. A scheme of highway works will be secured by condition and a Unilateral Undertaking, with the City Corporation as developer required to meet the full cost of the works. The scope of the highways improvement works which are considered necessary to make the development acceptable in planning terms (designed as per the Standards for Highways) include but are not limited to:
- Drainage arrangements.
  - Changes to the existing and proposed parking arrangements (road markings). This is subject to public consultation and amendments to existing traffic orders.
  - Changes to highways materials.
  - Changes to the general arrangements for footways and carriageways.
  - Highways Boundary clearly highlighted (existing and proposed if applicable).
  - Underground Utility Survey.
183. A road safety audit Stage 2 is to be submitted once the initial design has been approved.
184. Any hostile vehicle mitigation which it is agreed is necessary to place on the highway with any additional maintenance costs to be met by the City Corporation as developer.

#### Outline Construction Logistics Plan

185. An outline Construction Logistics Plan (CLP) has been prepared by the applicant in relation to the proposals to create a CoL Police facility within the Middlesex Street Estate.
186. The draft CLP includes information on the following:
- Indicative construction programme and methodology.
  - Vehicle routing and access for construction vehicles to and from the site.
  - Strategy to reduce the impact of construction vehicles.
  - Estimated vehicle movements associated with the construction works.
  - Measures to implement, monitor and update the CLP.
187. The document includes a description of the various phases of works and provides site layout plans at each stage of works. The draft CLP also confirms that there will be no need to suspend on street parking bays during construction. Also, there are no proposals to divert vehicle, cyclist, or pedestrian routes during construction.
188. The hours of operation of construction vehicles will be between 08.00 and 18.00 during weekdays and between 0.800 and 13.00 on Saturdays, in accordance with CoL guidelines.

189. The applicant is advised that a detailed CLP is to be submitted by the principal contractor undertaking/managing the construction phase once appointed, secured by condition. The CLP is to be drafted as per the Construction Logistics Planning Guidance.

#### Travel Plan

190. The proposed CoL police facility will provide the required cycle parking that would enable officers to cycle to the site. This ensures that a key measure of any travel plan is already secured and has been designed into the proposals. A detailed Travel Plan for CoL police facility should be submitted to CoL, secured by condition.

#### Cleansing

191. The Cleansing team were consulted and raised no objections.

#### Transport Conclusion

192. The following is proposed to be secured via condition:
- Full Delivery and Servicing Plan.
  - Full Construction Logistics Plan.
  - Full Cycle promotion plan.
  - Details of the cycle parking facilities.
  - Details of the waste storage facilities.
  - Highways Improvement works to be agreed prior to occupation.
193. Therefore, subject to conditions and detailed design, the proposal is considered acceptable in transport terms and to comply with Local Plan policies DM16.1, DM16.2, DM16.3, DM16.4 and DM16.5.

### **Environmental Impact of Proposals**

#### Operational use and construction

194. Local Plan policies CS21 and DM21.3 seek to ensure the residential environment is protected, and policies DM15.6 and DM15.7 seek to address air quality, noise and light pollution arising from development including the construction phase.
195. The Environmental Health team were consulted and stated that due to the proposals being within a highly residential area, the development will require close adherence to the supplied Operational Management Plan, compliance with internal City of London Police operational codes and will require diligent monitoring by CoLP coupled with detailed complaint investigation and resolution protocols and regular resident liaison to prevent unacceptable noise impacts particularly at night, between 2300 and 0700.
196. The Environmental Health team state there is likely to remain some residual noise impacts for residents during the ultimate end use of the facility, specifically from vehicle and officer movements. In addition, the Environmental Health team state that the construction phase will be highly impactful due to its

location, the number of residents above the site and the unique construction of the estate leading to heavy noise transference throughout. There are also cumulative impacts from significant development adjoining the estate e.g. 115 Houndsditch. The Scheme of Protective Works for the Demolition and Construction phases may need to adopt controls in excess of the standards outlined in the existing Code of Construction Practice.

197. The Applicant has submitted an Operational Management Plan for the proposal which includes states:

- The base will be completely segregated from the residential areas by the provision of dedicated police entrances into the base in Gravel Lane, replicating the existing shop unit entrances. This will help to ensure that current access arrangements for residents are unaffected and that police officers will not have to share lift and stair areas with residents of the estate.
- The only spaces that will be shared by City of London Police officers and estate residents will be the vehicle routes into and out of the ground floor and basement. The existing secure compound utilises the ramp to the basement, currently sharing this access route with residents' vehicles and the new base will continue with this existing arrangement. A compound will be added at ground floor level in the new Eastern Base, utilising space that was previously for unallocated parking in the Middlesex Street Estate. City of London Police vehicles parking at this level will be from non-response units and a large part of the space will be for the secure parking of the larger Police vans due to the additional floor to ceiling height available here. The larger police vans are currently parked along Devonshire Square and will be relocated within the compound.
- Police parking areas will be discreetly screened in these separate new secure compounds at basement and ground floor levels and no City of London Police vehicles will be parked outside of these secure compounds.
- The existing City of London Police secure compound accommodates between 32 and 40 vehicles depending on the extent of double banked parking. These vehicles will move over to the new Eastern Base with the only additional vehicles parking there being the larger Police vans on the ground floor. City of London Police representatives have attended all the residents' meetings and forums and public events since these were convened in February 2023. As a result of feedback received at those meetings from residents in relation to the potential noise of sirens and rapid vehicle movements, the City of London Police have reviewed the teams that will be located at the Eastern Base and have moved a response team who were due to be located at this site elsewhere, including their response vehicles. Following the public consultation process, City of London Police have agreed that no response vehicles will now be based on this site, and it is therefore extremely unlikely that any vehicles leaving the site will be exiting with sirens on.
- City of London Police have stated that they fully recognise the sensitivity of the Eastern Base location and the need to avoid causing disturbance to their neighbours and have underlined this at the various resident meetings

and public events. The forces' standard operating procedure for driving standards states that 'Inappropriate and inconsiderate use of warning instruments (e.g. sirens, blue lights and headlamp flashers) must be avoided' and drivers are expected to comply with this force policy at all times. Breaches of this policy may result in disciplinary action.

- However, City of London Police would need to maintain the ability to respond to a major incident in a manner that maintains the safety of the whole community and therefore in extreme circumstances, or in the event of a major incident, CoLP vehicles may need to exit the site while using warning instruments to ensure pedestrians and approaching vehicles are aware of their presence. This would be a very infrequent occurrence and on the rare occasions it is required would be more likely to occur when exiting the site at times when the roads and pavements are busier e.g. during the standard working day. Siren use will comply with Regulation 99 (Use of audible warning instruments) as set out in The Road Vehicles (Construction and Use) Regulations 1986.
- Occasionally the warning instruments on vehicles – sirens, blue lights and headlamp flashers – need to be tested before the vehicles are used to ensure these systems are working properly. This will be undertaken within the secure basement compound which is designed to prevent noise transfer to adjoining residential areas. An acoustic test has been undertaken to confirm the acoustic separation of the compound and residential units. The assessment for the impact of siren testing in the basement demonstrates this will be audible in some locations and recommends attenuation measures. A condition is recommended to secure these mitigation measures.
- A key piece of training equipment that was due to be located at the Eastern base has also been removed from this project and will now be located elsewhere in the City of London Police Estate because it was identified that the use of this equipment may create too much noise that would impact on residents.
- The Eastern Base will provide gym facilities to police staff during the working hours with scheduled learning and development sessions, with limited to no use overnight. It has been assessed that the location of the gym is structurally separate to the residential units and the design will be developed to achieve G20 from PropPG - Gym Assessment Guide to not be intrusive.
- The City of London Police are committed to ensuring any disruption to residents is minimised, this is captured in the forces operating procedure, where officers are aware of the residential nature of the site, and reminded to turn down their radios and avoid the slamming of doors when in the Estate.
- The force regularly reviews how it is currently operating from the existing site and will continue to do so in the future facility. As indicated previously, night time shift patterns provide a lower number of officers attending the

facility. As a non-operational base, the numbers would reduce for the accessing / exiting the facility during those times. It should also be noted that the majority of activity during that time is likely to be via the vehicle ramp and directly into the CoLP area, the external pavement noise being very limited if at all.

- For communications:
  - During the construction works a robust Communications Protocol will be implemented and sets out the aims, channels and processes for communications in regard to the construction stage of the Eastern Base at Middlesex Street Estate.
  - To provide residents with direct access so that any issues can be raised via the email address and phone number that has already been established for residents to raise any issues or concerns that the force acts upon immediately via Local / Community Policing.
  - Post construction community liaison groups will continue to enable local residents to regularly engage face to face with the City of London Police. The Applicant has shared a dedicated email and telephone number for residents to raise any concerns.
  - In addition, the force regularly undertakes local meetings with residents including:
    - Cluster meetings including Middlesex Street
    - Engagement with Community Policing officers via local patrols
    - Annual rate Payer meetings that CoLP are represented at with residents.

198. The Applicant submitted an Outline Construction Environmental Management Plan and an Outline Construction Logistics Plan which include strategies to reduce impacts including from transport, noise and vibration, air quality and waste. In addition, the applicant states the liaison with residents will include the frequent distribution of newsletters and attendance at meetings with representatives of local businesses and residents' groups. The final details of these documents will be subject to condition. It is recommended that the Environmental Scheme of Protective works includes the provision of a respite area for residents and the continuation of the Community Steering Group during the construction phase.

199. In addition, there are residential windows above the ramp at Artizan Street and above the units on Gravel Lane. However due to the distance from the windows, the number of vehicles, and the Operational Management Plan, it is not considered that there will be adverse impacts as a result of the proposal.

200. Therefore it is considered that the impacts arising from the operational and construction phases would be adequately mitigated by recommended conditions, including a proposed condition which would require compliance with an Operational Management Plan, to ensure there would not be unacceptable impacts to the residential amenity of Middlesex Street Estate.

#### Noise and Vibration

201. 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.

202. An Acoustic Assessment has been submitted which provides an outline assessment of the impact of noise and vibration from the mechanical plant on the surrounding area. In addition, operational use noise and construction impacts have been considered.
203. Noise surveys were completed at the proposed development to ascertain existing noise levels in and around the development site.
204. The assessment states that the existing building along with the necessary upgrades to create the accommodation will be suitable to prevent the structural noise transfer to neighbouring sensitive accommodation. It states that noise due to increased vehicle movements will not be significant, when compared to existing use of the site and Officers will be instructed not to use sirens when exiting the estate in routine circumstances.
205. Concerns have been raised from the nearby residents regarding noise and dust during construction. Noise and vibration mitigation, including control over working hours, types of equipment used, would be included in Schemes of protective works for Demolition and Construction Logistics Plan to be approved by condition.
206. Subject to the proposed conditions and compliance with the Operational Management Plan, the proposals would comply with London Plan Policy D13 and D14, Local Plan Policy DM15.7 and draft City Plan 2036 Policy HL3.

#### Light Pollution

207. Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9, the Lighting SPD 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.
208. To ensure that appropriate lighting levels are achieved externally and internally including at podium level, and to mitigate impacts of public realm and nearby residential properties, a condition for the submission of relevant details of a Lighting Strategy, Lighting Concept and Technical Lighting design would be required to be submitted for approval. This will have to be submitted prior to the occupation of the building and the details shall accord with the requirements as set out in the Lighting SPD, including but not limiting to details of all external lighting and internal lighting visible from the public realm or which could impact to residential amenity and the environment. This should include a lighting scheme for the podium level.

#### Air quality

209. 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.

210. The Applicant submitted an Air Quality Assessment which addresses the likely impact of the proposed development on air quality as a result of the construction and the operational phases of the proposed development. It is noted that the development in compliance with the London Plan's requirements would be air quality neutral in terms of both building and transport related emissions.
211. It is recommended for the Scheme for Protecting Nearby Residents and Commercial Occupiers to be submitted and approved under conditions proposed.
212. The City's Air Quality Officer has raised no objection subject to conditions and informatives in respect of generators, combustion flues, and Non-Road Mobile Machinery Register.
213. In light of the above and subject to conditions, the proposed development would accord with Local plan policy CS15, policies HL2 and DE1 of the draft City Plan 2036 and SI 1 of the London Plan which all seek to improve air quality.

### **Sustainability**

214. The Applicant has submitted documents related to sustainability and climate resilience have been reviewed, including the Design and Access Statements, Sustainability and Energy Statement, Ecological Appraisal, and relevant plans and drawings.
215. As a minor development the scheme is not required to meet London Plan policy SI2 requirements. The scheme is not required to carry out optioneering in line with the CoL's Carbon Options Guidance as very little demolition is proposed (less than 50%). However, the Sustainability and Energy Statement outlines how the design approach adopts similar principles and hierarchy methodology to inform and justify the development proposal.

### **Whole Life-cycle carbon**

216. The Proposed Development aims to minimise embodied carbon emissions by focusing on the principles of the Carbon Reduction hierarchy (PAS 2080:202315) which follows the order of build nothing, build less, build clever, and build efficient.
217. The application is predominantly a change of use scheme with limited strip out, opening up, and new build works proposed to improve layout, security, and operational performance of the facility as outlined below. This limited scope of works helps to minimise upfront carbon emissions. The works comprise:
  - Removal of existing shop unit fit outs including existing toilets and partitions.

- Removal of the existing shop unit staircase in units 10, 12, 14 & 16 with the resulting open shafts to be re-used for a new lift installation and service risers with some infilled to provide new useable space.
  - A new internal 'link bridge' element for circulation across the double height service yard. This will require a section of concrete wall to be removed.
218. The scheme will make preference to purposefully unfinished building materials, for example avoidance of suspended ceilings in many building areas (office areas and corridors have suspended ceilings for acoustic purposes) and unfinished floors in the majority of spaces. There will also be a preference to robust materials, which are proven in similar 24/7 operational environments, in order to avoid frequency of replacement and reduce resulting waste streams in future.
219. Notable measures that are currently being explored include:
- Ceiling tiles with high recycled content for ground and 1<sup>st</sup> floor office and corridors.
  - Carpet tiles which incorporate bio-based materials and high recycled content for office spaces, meeting rooms and part of the rest room.
  - Pre-fabricated timber construction is proposed for the new community garden room and methods of pre-fabrication for elements of the associated timber canopy will be explored.
  - During procurement, locally sourced materials with EPDs will be targeted where possible.
220. The heating and cooling systems have been designed efficiently to further reduce upfront emissions:
- Minimum run lengths for pipes and ducts.
  - Appropriate capacity based on specific heating/cooling demands.
  - Specification of equipment with a preference for low-global warming potential refrigerants.
221. A principal contractor will be appointed with adequate experience for monitoring construction energy and water consumption, transport of materials to and waste from site, and the associated carbon emissions. The contractor would be expected to monitor and report these figures as part of their reporting against their site waste management plan but there will be no contractual obligation to meet these requirements, or any associated targets.

#### Circular economy

222. London Plan Policy SI7 and Local Plan Policy CS17 encourage developments to improve resource efficiency, and minimise waste, following the waste hierarchy.

223. The Proposed Development will retain the existing building and repurpose the existing retail units and low-grade structures (car park and service yard areas). The approach will maximise retention of existing materials for example designing out the need for additional floor systems (e.g. raised access floors) in favour of retaining the existing screeds.
224. An Outline Pre-Refurbishment Audit was produced based on site visits undertaken by R.S.P Architects. It included a list of materials to be removed and the preferred management options for reuse and recycling. According to the Sustainability statement, “the management options for each material type will be investigated by the project team as the project progresses, with a preference for options aligned with the principles of the circular economy.” The strip-out contractor appointed will have adequate experience and be required to comply with the outline pre-refurbishment audit, undertake their own detailed pre-refurbishment audit and implement a site waste management plan.
225. The development has been designed with material efficiency in mind including the ability to reclaim and re-use materials at the end of the building life. Long lifespan products will be specified where possible to reduce the need or frequency of replacement, coupled with a strong Operation & Maintenance (O&M) strategy to ensure good maintenance and repairs.
226. Notable measures include:
- the specification of all internal partitions as non-structural drywall construction which can easily be disassembled.
  - walls to form the compounds at basement and ground levels are modular which avoids the need for on-site construction of multiple layers.
  - as noted above, pre-fabricated timber construction is proposed for the new community garden room and will be explored for the associated timber canopy offering opportunities for efficiency and disassembly.
  - Adaptable building services:
    - VRV heating and cooling systems designed to be easily adapted (to accommodate potential changes of use);
    - Some scope to make alterations to and re-commission the proposed ventilation system to account for changes in use and occupancy;
    - Electrical distribution and containment will be sized to provide spare capacity for future cabling installations (avoiding the need to install new and replace existing containment).
227. In order to source materials responsibly and reduce waste, CoLP will ask the appointed Principal Contractor(s) to reduce their impacts by:
- Procuring materials and products from companies certified under a Responsible Sourcing Certification Scheme where viable;
  - Procuring materials and products with an Environmental Product Declaration (EPD) where viable;
  - Implementing good practice measures to reduce construction waste where viable (e.g., take back/resale schemes, using prefabricated building components); and
  - Implementing good practice site waste management practices (e.g., segregating waste into key waste groups for recovery) to help reduce waste sent to landfill.

### Operational energy considerations

228. As a minor development, Policy SI2 requirement to achieve a minimum 35% reduction of on-site emissions over Building Regulations does not apply, nonetheless, the design approach has followed the London Plan's Energy Hierarchy; 'Be Lean', 'Be Clean', and 'Be Green' to minimise emissions.

#### Be Lean:

229. The approach taken to energy efficiency is for consistent incremental improvement across the majority of energy efficiency parameters, avoiding reliance on exceptionally demanding specifications for specific fabric or services elements, and retaining flexibility and scope for optimisation during detailed design.
230. The existing building presents limited opportunity as a refurbishment scheme to improve the building envelope or incorporate large amounts of thermal mass, however, improvements would be made where feasible, including:
- Replacement of the failed waterproof membrane on the podium slab with the addition of new insulation over the top to improve the thermal performance (and reduce noise ingress/egress) to the occupied areas below.
  - Where replacing shop fronts for the Eastern Base, full height double glazed screens would be added comprising an outer glazed screen and a secondary inner screen set approximately 800 mm inside the outer façade.
  - All windows on the first floor would be replaced with high-performance double-glazing in a three-panel arrangement reducing heat transfer, improving daylighting to the spaces behind and allowing appropriate levels of winter heat gain.
  - Energy efficient lighting with automated controls (timeclocks/presence detection/light-sensitive dimming) is specified to ensure operation only when necessary.
  - Highly efficient building services equipment has also been selected, including energy efficient fans, pumps, and heating and cooling plant.

#### Be Clean:

231. The Site lies within a Heat Network Priority Area and the potential for the Proposed Development to connect to nearby energy networks has been investigated, as required by CoL Local Plan Policy DM 15.3.
232. The nature of the proposed development demands security and continuity of services (including heat) to meet operational requirements. As a result, on-site heat generation plant would still be required (for example heat pumps) even if a connection was made to an external heat network.
233. The nearby 115-123 Houndsditch development was granted planning permission by CoLC with the condition to provide a heat transfer system to

supply the residential flats at the Middlesex Street Estate. Feasibility of connecting to this system was also explored but deemed unviable.

#### Be Green:

234. All standard sources of renewable energy were evaluated for the scheme, with ASHPs identified as the most appropriate given the site constraints (e.g. lack of suitable roof space). The electric system would be refrigerant-based, comprising outdoor condenser units and indoor fan-coil units to meet space heating and cooling demands. A single system for both heating and cooling offering effective heat recovery and redistribution is proposed in terms of preferable energy performance. All domestic hot water (DHW) will be served by a separate electric ASHP.

#### Internal Overheating

235. An overheating assessment is not required but the cooling hierarchy (outlined in London Plan Policy SI4) has been considered to reduce the cooling loads where possible, as outlined below:

- Minimising internal heat generation through energy efficient design:  
Where possible, the heat distribution infrastructure within the building has been designed to minimise pipe lengths. Efficient lighting has been specified which incorporates dimming where there is sufficient daylight.
- Reduce the amount of heat entering a building in summer:  
Generally, the building has very low glazing proportions with the majority of the internal spaces enclosed within the estate and underneath the podium slab. Addition of new insulation over the top of the podium slab to improve the thermal performance. High performance solar control glazing has been specified which will reduce heat gains through windows.
- Use of thermal mass and high ceilings to manage heat within the building:  
There are limited opportunities in the Proposed Development to introduce any new thermal mass. However, the existing thermal mass is utilised and notably the thermal mass of the podium slab is to be retained and increased with the addition of the thermal insulation.
- Passive ventilation:  
The building type and location rules out any openable windows due to security risk.
- Mechanical ventilation:  
The Proposed Development will be mechanically ventilated and cooled.

#### Overheating Impact on Neighbouring Properties

236. The risk of overheating from new building plant for the Proposed Development, to the surrounding environment, including notably the neighbouring residential flats within Petticoat Tower, has been assessed.
237. New exhaust louvres for the new Air Handling Units (AHUs), Air Source Heat Pumps (ASHPs) and diesel emergency generators are proposed within plant enclosures located on the Artizan Street frontage. Due to the relatively open nature of the Site and the space outside the proposed plant enclosure, there is deemed to be adequate opportunity for any exhausted 'hot air', to mix with ambient air, and generally disperse to the surrounding area.

238. The diesel emergency generators will be used for business continuity and life safety in the event of power failure only, with infrequent testing (monthly for approximately 30 minutes).
239. Overall, the risk of detrimental overheating impacts from the proposed building plant to the nearby residential flats is considered to be a relatively low risk.

### BREEAM

240. London Plan Policy DM 15.1 requires BREEAM assessment for major developments only. The Sustainability Statement references two targets for the Proposed Development which align with BREEAM credits:
- An energy sub-metering strategy will be developed to comply with Part L2B of the Building Regulations. Sub-meters will be installed to enable at least 90% of the estimated annual energy consumption of each fuel to be accounted for and assigned to end-use categories. This is in-line with the criteria for the BREEAM New Construction Version 6 Ene 02 first credit.
  - Direct effect life-cycle CO<sub>2</sub>e emissions (DELCO) for heating and cooling systems of ≤1,000 kg CO<sub>2</sub>e / kW cooling and heating capacity (subject to further review at detailed design stages). This is in-line with the criteria for the BREEAM New Construction v6 Pol 01 first credit.

### Urban greening and biodiversity

241. The podium currently contains a lush and well-established green space with vegetation predominantly in raised planters. The planting beds include a wide range of plant species. Access to the gardens is limited to residents which helps foster a sense of ownership and community. The garden is well maintained by residents and the Residents Garden Club in conjunction with CoL maintenance contractors. Existing amenities include seating, raised planters, arched pergolas, greenhouse and storage, play-space and ball court.
242. The proposed refurbishment of the under-croft for new CoLP accommodation requires the replacement of the podium slab membrane in its entirety. The proposal will see removal and reinstatement with enhancement of all layers [paving, fixtures, planting beds] and amenities. The design will be produced in meaningful consultation with residents.
243. Greengage Ecologists conducted a survey and produced an Ecological Appraisal Report to establish the ecological value of the site and ensure impacts will be mitigated. The site has negligible potential to support any protected/notable species with the exception of nesting birds. Recommendations have been provided, to ensure nesting birds are protected during works with enhanced nesting opportunities provided as part of the proposed development.
244. The landscaping proposal will increase greening in the region of 25% by area and 30% in terms of biodiversity. The extent of planting proposed is already approaching the limit in terms of loading capacity of the podium structure so further increase in area would be challenging.

245. An Ecological Management Plan (EMP) should be produced and implemented for the site providing a high level of detail on the ecological landscaping features selected, and to ensure they retain their ecological benefit in the long term.
246. Raised planters will be installed to the Gravel Lane frontage. Integrated landscaping was explored but had to be ruled out due to below ground utilities and security measures.

#### Climate resilience

247. The reinstatement of the podium landscape is an opportunity to increase climate change resilience:
- Climate resilient planting: The new planting scheme and palette will follow design principles that add ecological value, create micro habitats and niches and use drought tolerant species.
  - Targeted irrigation. The planting does not include automated irrigation drip line and pipes. Irrigation is to be targeted at establishment phase and only at critical times to prevent catastrophic plant failures.
  - Increased foliage cover. Planting bed extents have been increased to raise the overall area of planting. Proposal to include small trees with spreading crown where possible to increase shade cover.
  - Shaded seating area. A timber shelter with green roof will offer an area protected from the sun.
  - Light-coloured paving to reflect rather than absorb daytime heat.
  - Rainwater to be harvested from biodiverse roofs.
  - of the community room and timber shelter. Excess run off collected in water butts with taps for use by gardening club.
  - Reduced/low energy light fittings.
248. Where possible, the development will use low water-use fittings, automated controls, and a leak detection system to reduce potable water demand.

#### Flooding

249. A Flood Risk Assessment and Surface Water Drainage Strategy was undertaken by Stantec in July 2023. The site is located in Flood Zone 1 and is at 'Low' or 'Very Low' risk of flooding from all sources.
250. The Proposed Development will result in no change in impermeable area and no increase in surface water run-off from the site. The Surface Water Drainage Strategy for the Proposed Development will reuse the existing below ground (below basement) gravity drainage network. Due to the nature of the site/scheme it is not practical to introduce surface water attenuation or SuDS features. Landscaping proposals will see an enhancement to the range and diversity of planting which will act as natural flood management (i.e. through rainfall interception) to reduce flood risk.
251. The Lead Local Flood Authority were consulted and responded with no comments.

### Transport

252. The site already achieves a Public Transport Accessibility Level (PTAL) of 6b, demonstrating an excellent level of accessibility to public transport.
253. Electric vehicle (EV) charging points will be provided for police vehicles and in the residential parking area (11 and 7 chargers respectively).
254. A total of 44 cycle parking spaces will be provided within the police compound with lockers and changing rooms provided for cyclists. Space for 205 cycles plus 11 wider-spaced cycle bays will be provided for residents served by two dedicated lifts. These measures will support a reduction in car use, increase uptake of sustainable transport, reduce road congestion and carbon emissions, and improvement in local air quality.

### Sustainability Conclusion

255. Overall, the proposed scheme is expected to provide a range of sustainability benefits. The City supports schemes which prioritise retrofit over new build and the development makes use of a constrained site with load grade structure, which has limited access to daylight and ventilation. Heating, power and ventilation strategies are further restricted by strict security requirements connected to the occupier and use.
256. The whole life-cycle carbon emissions are expected to be relatively low, achieved by retaining and reusing the majority of the existing building with limited new intervention, and by enhancing the thermal performance through the upgrading of areas of building fabric and incorporating energy efficient services (low water use and heat recovery) and renewable technologies of ASHPs. The Sustainability and Energy Statement outlines the design approaches adopted to reduce carbon and incorporate circular economy principles including retention of materials at as high use value as possible and designing for longevity – specific details would arise as the design progresses. The outline pre-demolition audit and brief requirements for the principal contractor support the aims.
257. The installation of all electrical plant (except for emergency generators), a combined heating and cool system and domestic hot water supply equipped with ASHPs will significantly improve operational efficiency and reduce carbon emissions. In general, the building has a low proportion of glazing whilst new insulation over the podium and energy efficient window replacements will help mitigate overheating risk.
258. The proposal will improve on-site greening by an increase of around 25% area and 30% in terms of biodiversity. For the duration of the works, residents will lose access to their green amenity space, however the proposal, would offer long term, lasting benefits. Aging equipment would be replaced with improved versions and additional amenity use provided, including an indoor community room, rainwater harvesting and shaded seating. New planting will be more climate resilient and offer an increased level of shading and natural flood management.



## **Security**

259. Local Plan Policy CS3 highlights the needs for the City to be secure from crime, disorder and terrorism thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.
260. Concerns raised by residents regarding the security and safety impacts of the proposal.
261. The proposal incorporates security measures at the site. This proposal includes the existing basement ramp to install a new replacement boom barrier located at the top with a secondary bi-folding gate at the bottom of the ramp to prevent any unauthorised pedestrian access via this ramp. In addition, improvements to residents' security are also being reviewed as part of the project including to current CCTV systems and residential entrance door locking.
262. In addition, improvements are proposed for the cycle storage at basement and a new cycle entrance and storage area at ground floor.
263. A condition has been recommended for the Applicant to provide security improvements including lighting and CCTV for residents.
264. The proposal, subject to conditions, is considered to be in accordance with policy CS3, DM3.2, and draft City Plan policies S2, SA1 and SA3.

## **Fire Statement**

265. A Fire Statement Form has been submitted with the application. This has been reviewed by the Health and Safety Executive (HSE) as a statutory consultee for a relevant building.
266. Following a review of the information provided in the planning application, HSE is content with the fire safety design relating to the project description, to the extent that it affects land use planning.
267. HSE made a number of recommendations including for a retrospective fire strategy for the whole of Petticoat Square, installation of wet fire mains, improved fire service access and firefighting facilities, provision of firefighting lifts, installation of sprinkler systems, external wall system and fire hydrant details. These comments have been passed onto the applicant to address and are outside the remit of this application.
268. The application is not considered a major development. The Applicant has provided information for the proposals for the relevant aspects in accordance with policies D5 and D12 of the London Plan.
269. An informative has been recommended for the Applicant to review HSE recommendations and implement.

### **Planning Obligations**

270. The proposed development would require planning obligations to be secured in a Section 106 unilateral undertaking to mitigate the impact of the development to make it acceptable in planning terms.
271. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

### **City's Planning Obligations**

272. The obligations set out below are required in accordance with the City's SPD. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy:
- Highways improvement works.
  - Construction monitoring costs.
  - Design and evaluation fee.
  - Highway condition survey.
  - Ongoing maintenance for highway works.
  - Section 106 monitoring cost.
  - Highway Repairs (to provide for any necessary remedial highway works) and other highways obligations relating to a scheme of highway works, including an indemnity in respect of any costs or claims relating to the highway works. The scope of the scheme of highway works may include, but is not limited to:
    - a. Drainage arrangements.
    - b. Changes to the existing and proposed parking arrangements (road markings). This is subject to public consultation and amendments to existing traffic orders.
    - c. Changes to highways materials.
    - d. Changes to the general arrangements for footways and carriageways.
    - e. Highways Boundary clearly highlighted (existing and proposed if applicable).
    - f. Underground Utility Survey.
    - g. A road safety audit Stage 2 is to be submitted once the initial design has been approved.
    - h. Any hostile vehicle mitigation which it is agreed is necessary to place on the highway with any additional maintenance costs to be met by the City Corporation as developer.

| <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> |
|---|--|---------------------------------|---|
| S106 Monitoring Charge  | £250                                   | £0                              | £250  |
| <b>Total liability in accordance with the City of London's policies</b> | <b>£250</b>                            | <b>£0</b>                       | <b>£250</b>                                       |

273. The appropriate mechanism for securing the planning obligations, and enabling your Committee to give weight to them, requires particular consideration in this case because the applicant (and owner) is the City Corporation. Ordinarily a third party owner is involved in a development who can enter into a Section 106 Agreement with the City Corporation and give covenants to secure planning obligations. In this case, there is no other interested party involved in the development, so all undertakings and commitments fall to be given by the City Corporation itself.
274. The fact that the City Corporation would be giving covenants under S.106 of the Town and Country Planning Act 1990 gives rise to a technical enforceability issue because the City Corporation could not take legal action against itself. In order to give weight to the planning obligations, the City Corporation as local planning authority needs to be satisfied that the required planning obligations would be complied with, notwithstanding the lack of ultimate enforcement powers through the courts.
275. In line with the City Corporation's previous practice, it is considered that the appropriate way of addressing this enforceability issue is for the City Corporation as landowner to resolve to comply with the planning obligations. Additionally, a unilateral undertaking under S.106 should be signed by the City Corporation as landowner, and this will be placed on the Local Land Charges and Planning Registers to provide a public record of the covenants, as is the practice with all S.106 Deeds. It is considered that the dual assurance of a unilateral undertaking and express commitment regarding compliance, would give your Committee reasonable grounds to give weight to the planning obligations in evaluating this application.
276. Your approval is therefore sought for a unilateral undertaking to be accepted to cover the obligations set out above, together with the payment of the local planning authority's legal and planning administration fees associated with the undertaking. As negotiations on the form of the undertaking will continue after any resolution to grant planning permission, I request that I be given delegated authority to continue to negotiate and agree the terms of the obligations and to make minor changes in the event that changes are needed to vary or add conditions or informatives to those proposed, or to move conditions into obligations or vice versa, provided always that officers do not exceed the substantive nature of the Committees decision.

#### Monitoring and Administrative Costs

277. 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.
278. 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.
279. The development constitutes a change of use but does not propose an uplift in floor space over 100sqm (GIA). As a result, CIL would not be triggered in this instance.

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

280. An Equalities Impact Statement was submitted with the application which did not identify potential for discrimination or adverse impact to any protected groups beyond the recommend provision of engagement materials in different languages. This has been recommended as an informative. In addition, the document highlighted that the local community has been consulted through a variety of events and feedback shaped the proposal. The proposed design of the Development ensures parking and storage provisions are improved and accessible in order to meet the differing needs of residents and commercial tenants. In addition, the new community spaces, including a new gym will increase opportunities for socialisation, recreation and exercise, and the sense of safety and security would be improved through enhanced security provisions and landscaping.
281. 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.
282. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation.
283. It is the view of officers that a decision to grant permission, subject to conditions, would remove or minimise disadvantages faced by disabled persons and in particular mobility impairment by providing enhanced and accessible public realm and retaining the blue badge bay on Gravel Lane and spaces internally in the car park, which will be secured by condition.

### **Human Rights Act 1998**

284. 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")).
285. 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 residential 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. Although it is recognised that the development would have some impact on the amenities of the nearby residents, including by way of noise and disturbance during construction, it is not considered that, subject to conditions, the proposal would result in unacceptable impact on the existing use of nearby residential properties to an extent that would warrant refusal of the application on those grounds. It is considered that the strategic operational need for police and benefits of the

scheme, including the provision of additional resident and community spaces and facilities, outweighs the adverse impacts on nearby residential properties and that such impact is necessary in the interests of the strategic operational safety and security needs and wellbeing of the country and is proportionate.

286. 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 residential amenity, it is the view of officers that such interference, in these circumstances, is in the public interest and proportionate.

### **Conclusions and Overall Planning Balance**

287. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Local Plan and considering all other material considerations.
288. The Applicant states the east of the City contains significant demand for the CoLP with night time-related offences and highlights future development in the area will increase future demand. This strategic operational need in the east of the City is reinforced by the planned closure of Bishopsgate Police Station.
289. As a proposed operational facility, the Eastern Base will only be occupied by uniformed City of London Police officers, who report to the Base and then go out on patrol to serve the community. Rapid response vehicles will not be based at the Site.
290. A total of 74 objections have been received from the public, objecting principally on the grounds of noise, disturbance, impacts to residential amenity and traffic. This report has considered these impacts, including any requisite mitigation which would be secured by conditions.
291. The Environmental Health team were consulted and stated that due to the proposals being within a highly residential area, the development will require close adherence to the supplied Operational Management Plan, compliance with internal City of London Police operational codes and will require diligent monitoring by COLP coupled with detailed complaint investigation and resolution protocols and regular resident liaison to prevent unacceptable noise impacts particularly at night, between 2300 and 0700.
292. The Environmental Health team state there is likely to remain some residual noise impacts for residents during the ultimate end use of the facility, specifically from vehicle and officer movements, and that the construction phase will be highly impactful due to its location, the number of residents above the site and the unique construction of the estate leading to heavy noise transference throughout. There are also cumulative impacts from significant development adjoining the estate e.g. 115 Houndsditch. The Scheme of Protective Works for the Demolition and Construction phases may need to adopt controls in excess of the standards outlined in the existing Code of Construction Practice.

293. Negative impacts during construction would be controlled as far as possible by the implementation of Schemes of protective works for demolition and construction and a Construction Logistics Plan and good site practices embodied therein. It is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions would minimise any adverse impacts.
294. In regards to transport considerations, for vehicle trips, the relocation of the CoL Police to the Eastern Base will increase vehicle movements in the area. However, the increase in trips is not expected to be significant and can be accommodated on the existing local road network. These trips would also not be new trips on the wider CoL road network, as they would represent displaced trips. Therefore, there will be no overall increase in vehicle trips within CoL area.
295. The applicant considers that the reduction in resident parking will not adversely affect the operation of the car park as the recorded maximum demand for private car parking would be provided for, and this would be in excess of the number of identified permit holders (+11 in circulation and +17 as recorded in the maximum parking surveys) providing some level of parking contingency. The Applicant states there will be enhanced car parking management procedures implemented.
296. The volume of traffic expected does not create traffic safety concerns in and of itself given the moderate increase expected and the fact that existing trips already exist on the network.
297. There would be an increase the number of cycle parking spaces and improve the cycle parking facilities (notably for accessible users), and this is welcomed.
298. The applicant has undertaken a servicing vehicle survey, which shows 12 vehicles per day were undertaking servicing / deliveries and this includes 2 visits for refuse vehicles which is considered acceptable, subject to conditions.
299. Highway improvement works are proposed along the section of Gravel Lane fronting the site. The works include (but not limited to) partial footway widening to maintain an improved road alignment and footway width. Any proposed changes to on-street car parking would also be subject to public consultation but it is at this stage proposed that there would be the relocation of an existing disabled bay to the south. There are also plans to convert part of the existing pay and display bays into a loading area.
300. In respect of design, there would be a degree of visual impact by expanding the existing police facility within the Estate, and this would be particularly noticeable on Gravel Lane. Although the detailed design conditions would further seek to mitigate any visual impacts and refine the delivery of the proposals, by virtue of their impact on Gravel Lane the proposals are considered to be contrary to Local Plan policies CS10 and DM10.1. However this is considered acceptable given other material considerations, in this case, the strategic operational requirements of the police. In addition, a public art display is proposed in the windows to mitigate this impact.

301. In regards to heritage, the Middlesex Street Estate is not considered to meet the criteria to be identified as a non-designated heritage asset, therefore would be no impact in this respect. The proposals would preserve the character, appearance and significance of the Wentworth Street Conservation Area, the only designated heritage asset identified as having the potential to be impacted by the proposals. As such, the proposals are considered to accord with Local Plan Policies CS 12 and DM 12.1, emerging City Plan policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs in relation to heritage.
302. In sustainability terms, overall, the proposed scheme is expected to provide a range of sustainability benefits compared to the existing building. The City supports schemes which prioritise retrofit over new build and the development makes use of a constrained site with load grade structure, which has limited access to daylight and ventilation. Heating, power and ventilation strategies are further restricted by strict security requirements connected to the occupier and use. The installation of all electrical plant (except for emergency generators), a combined heating and cool system and domestic hot water supply equipped with Air Source Heat Pumps (ASHPs) will significantly improve operational efficiency and reduce carbon emissions.
303. For urban greening and biodiversity, the podium currently contains a lush and well-established green space with vegetation predominantly in raised planters. The planting beds include a wide range of plant species. The landscaping proposal will increase greening in the region of 25% by area and 30% in terms of biodiversity. An Ecological Management Plan (EMP) is recommended by condition to be produced and implemented for the site providing a high level of detail on the ecological landscaping features selected, and to ensure they retain their ecological benefit in the long term.
304. The principle of the police use is considered acceptable, subject to conditions, in this location to support the strategic operational need identified by the police and to provide essential social essential infrastructure required in the City.
305. The proposals result in a loss of six retail units and a gym. Although there has been some relocation of retail units and active frontage is proposed through public art, the proposal is considered to be contrary to Local Plan policies CS20 and DM20.3, and draft City Plan Policy RE3, due to the loss of retail in proximity to residential uses and in the absence of active marketing and vacancy information for these units. However, due to the provision of active frontage due to window design and the installation of public art on the Gravel Lane frontage, the wider provision of shops in the area, and the strategic operational need for the police use, the loss of retail is considered acceptable in this case.
306. The proposed development will require planning obligations to be secured in a Section 106 unilateral undertaking to mitigate the impact of the development to make it acceptable in planning terms.
307. 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.

308. Paragraph 101 of the NPPF states that planning decisions should promote public safety and should take into account wider security and defence requirements including by recognising and supporting development required for operational defence and security purposes.
309. The London Plan states that proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies, and that seek to make best use of land including the public-sector estate, should be supported.
310. The adopted Local Plan Policy CS3 states the importance of ensuring the City is secure from crime, disorder and terrorism which includes proactively managing night-time entertainment to minimise disturbance to residents and workers, and to ensure that development takes account of the need for resilience so that the residential and business communities are better prepared for, and able to recover from, emergencies.
311. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as material planning considerations weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the Schedule attached.
312. Officers consider this to be a finely balanced case whereby the impact to residential amenity has been considered in detail. The proposed use represents a strategic need to maintain safety and security in the east of the City. The proposal would make the best use of land, optimising the site capacity to facilitate these essential operational facilities.
313. In addition, Officers consider there to be a range of additional amenities for exclusive use of residents arising from the proposal including a dedicated estate office with meeting space, new cycle storage and dedicated cycle lifts to basement, improved cycle facilities at basement level, and a new garden room at podium level.
314. 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 development plan when taken as a whole 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.
315. Therefore it is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and taking into account all material planning considerations, it is recommended that planning permission be granted subject to all the relevant conditions being applied, including ensuring compliance with the Operational Management Plan, in order to secure benefits and minimise the impact of the proposal.



## Appendix A

### London Plan Policies

- Policy GG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy GG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (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 D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D13 Agent of Change
- Policy D14 Noise
- Policy S1 Developing London's social infrastructure
- Policy E9 Retail, markets and hot food takeaways
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy HC5 Supporting London's culture and creative industries
- Policy G1 Green infrastructure
- Policy G4 Open space
- Policy G5 Urban Greening
- Policy G7 Trees and woodlands
- Policy G6 Biodiversity and access to nature
- 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 T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T6.1 Residential car parking
- Policy T7 Deliveries, servicing and construction

### 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).

#### Local Plan Supplementary Planning Guidance

- Air Quality SPD (CoL, July 2017);
- Archaeology and Development Guidance SPD (CoL, July 2017);
- City of London Lighting SPD (CoL, October 2023);
- City Public Realm SPD (CoL, July 2016);
- City Transport Strategy (November 2018 – draft);
- City Waste Strategy 2013-2020 (CoL, January 2014);
- Lighting SPD (CoL, October 2023);
- Open Space Strategy SPD (CoL, January 2015);
- Protected Views SPD (CoL, January 2012);
- Planning Advice Notes on Sunlight City of London Wind Guidelines (2019);
- City of London Thermal Comfort Guidelines (2020);
- Planning Obligations SPD (CoL, May 2021).

#### Relevant Draft City Plan 2036 Policies

- Policy S1 Healthy and inclusive city
- Policy HL1 Inclusive buildings and spaces
- Policy HL2 Air quality
- Policy HL3 Noise and light pollution
- Policy HL4 Contaminated land and water quality
- Policy HL5 Location and protection of social and community facilities
- Policy HL8 Play areas and facilities
- Policy HL9 Health Impact Assessments
- Policy S2 Safe and Secure City
- Policy SA1 Crowded Places
- Policy SA3 Designing in security
- Policy S3 Housing
- Policy HS3 Residential environment
- Policy S5 Retailing
- Policy RE3 Ground floor retail provision elsewhere in the City
- Policy S6 Culture, Visitors and the Night -time Economy
- Policy CV5 Public Art
- Policy S7 Smart Infrastructure and Utilities
- Policy S8 Design
- Policy DE1 Sustainability Standards
- Policy DE2 New development
- Policy DE3 Public realm
- Policy DE4 Pedestrian permeability
- Policy DE6 Shopfronts
- Policy DE9 Lighting
- Policy S9 Vehicular transport and servicing
- Policy VT1 The impacts of development on transport
- Policy VT2 Freight and servicing
- Policy VT3 Vehicle Parking
- Policy S10 Active travel and healthy streets
- Policy AT1 Pedestrian movement
- Policy AT2 Active travel including cycling
- Policy AT3 Cycle parking
- Policy S11 Historic environment
- Policy HE1 Managing change to heritage assets
- Policy HE2 Ancient monuments and archaeology
- Policy S14 Open spaces and green infrastructure
- Policy OS1 Protection and Provision of Open Spaces

- Policy OS2 City greening
- Policy OS3 Biodiversity
- Policy OS4 Trees
- Policy S15 Climate resilience and flood risk
- Policy CR1 Overheating and Urban Heat Island effect
- Policy CR3 Sustainable drainage systems (SuDS)
- Policy CR4 Flood protection and flood defenses
- Policy S16 Circular economy and waste
- Policy CE1 Zero Waste City
- Policy CE2 Sustainable Waste Transport
- Policy S20 Aldgate, Tower and Portsoken
- Policy S27 Planning contributions

### Relevant Local Plan Policies

#### ***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.

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

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

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

- a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
- b) reasonable gas and water supply considering the need to conserve natural resources;
- c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
- d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
- e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable

Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

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

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

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

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

#### ***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.

### ***CS4 Planning contributions***

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

### ***CS8 Meet challenges facing Aldgate area***

To regenerate the amenities and environment of the Aldgate area for businesses, residents, workers, visitors and students, promoting development and investment.

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

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

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

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

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

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

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

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

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

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

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

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

### ***DM10.5 Shopfronts***

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

- a) respect the quality and architectural contribution of any existing shopfront;
- b) respect the relationship between the shopfront, the building and its context;
- c) use high quality and sympathetic materials;
- d) include signage only in appropriate locations and in proportion to the shopfront;
- e) consider the impact of the installation of louvres, plant and access to refuse storage;
- f) incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
- g) not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
- h) resist external shutters and consider other measures required for security;
- i) consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
- j) be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

#### ***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.

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

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

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

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



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

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

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

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

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

#### ***DM12.4 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.

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

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

### ***DM15.1 Sustainability requirements***

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

### ***DM15.2 Energy and CO2 emissions***

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:
  - a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
  - b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
  - c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and

non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;

d) anticipated residual power loads and routes for supply.

### ***DM15.3 Low and zero carbon technologies***

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

### ***DM15.4 Offsetting carbon emissions***

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".
2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

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

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

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

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

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

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

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

4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

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

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

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;
- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

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

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

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

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

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

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



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

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

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

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

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

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

### ***DM19.3 Sport and recreation***

1. To resist the loss of public sport and recreational facilities for which there is a continuing demand, unless:

- a) replacement facilities are provided on-site or within the vicinity that meets the needs of the users of that facility; or
- b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
- c) it has been demonstrated that there is no demand for sport and recreation facilities which could be met on the site.

2. Proposals involving the loss of sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floorspace has been actively marketed at reasonable terms for sport and recreational use.

3. The provision of new sport and recreation facilities will be encouraged:

- a) where they provide flexible space to accommodate a range of different uses/users and are accessible to all;
- b) in locations which are convenient to the communities they serve, including open spaces;
- c) near existing residential areas;

d) as part of major developments subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses;

e) where they will not cause undue disturbance to neighbouring occupiers.

4. The use of vacant development sites for a temporary sport or recreational use will be encouraged where appropriate and where this does not preclude return to the original use or other suitable use on redevelopment.

#### ***DM19.4 Play areas and facilities***

1. The City Corporation will protect existing play provision and seek additional or enhanced play facilities or space, particularly in areas identified as deficient, by:

a) protecting existing play areas and facilities and, on redevelopment, requiring the replacement of facilities either on-site or nearby to an equivalent or better standard;

b) where the creation of new play facilities is not feasible, requiring developers to work with the City Corporation to deliver enhanced provision nearby;

c) requiring external play space and facilities as part of new residential developments which include 20 or more family units (those with 3 or more bedrooms) or 10 or more affordable units of 2 or more bedrooms;

d) promoting opportunities for informal play and play within open spaces where it is not possible to secure formal play areas.

2. Play areas and facilities should not be located where they would cause undue disturbance to neighbouring occupiers.

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

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

#### ***DM20.3 Retail uses elsewhere***

To resist the loss of isolated and small groups of retail units outside the PSCs and Retail Links that form an active retail frontage, particularly A1 units near residential areas, unless it is demonstrated that they are no longer needed.

#### ***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.

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

1. The amenity of existing residents within identified residential areas will be protected by:
  - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
  - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

### ***CS22 Maximise community facilities***

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

#### ***DM22.1 Social and community facilities***

1. To resist the loss of social and community facilities unless:
  - a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
  - b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
  - c) it has been demonstrated that there is no demand for another similar use on site.

2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.

3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:

- a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
- b) in locations which are convenient to the communities they serve;
- c) in or near identified residential areas, providing their amenity is safeguarded;
- d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.

4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

# SCHEDULE

APPLICATION: 23/00882/FULL

## Middlesex Street Estate

**Change of use of: (i) part basement, part ground and part first floor levels of six retail units and ancillary residential and ancillary commercial areas, to provide a police facility (sui generis) and ancillary residential parking and storage areas and facilities, and (ii) part ground and part first floor levels from gym use to community space (Class F2); and external alterations including: shopfront changes, installation of plant, erection of flue and louvre treatment, works to podium level and associated landscaping including erection of garden room, associated highways works to Gravel Lane and landscaping, installation of security measures; and associated works.**

## CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 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.
- 3 There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried

out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

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

- 4 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.

- 5 The development hereby permitted shall not commence until the following, in consultation with London Underground, have been submitted to and approved in writing by the local planning authority which:

- b. provide details on any works around London Underground assets including any works on Artizan Street, Gravel Lane and White Kennett St.
- c. accommodate the location of existing London Underground structures.
- d. provide load change details and associated assessment of ground movement impact on London Underground structures due to temporary and permanent changes in loading associated with the proposed works.
- e. provide details on the use of tall plant, scaffolding and lifting equipment, if any.
- f. provide detailed design and Risk Assessment Method Statement (RAMS) on all works including temporary and permanent works.
- g. mitigate the effects of noise and vibration arising from the adjoining railway operations.
- h. provide technical specifications related to the proposed plant. Upon review of the technical specifications, an independent EMC impact assessment may be required to be submitted for TfL Engineers' approvals. This is to ensure any EMC issues emanating from the plant or equipment to be used on the site or in the finished structure will not adversely affect London Underground electrical equipment or signalling systems.

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.

- 6 Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.  
REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy S11D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.
- 7 Prior to commencement of the development updated information on materials shall be submitted (as appropriate within security considerations) to the Local Planning Authority to include details of the reuse and recycling of deconstruction materials, and the specification of proposed materials and products with particular reference to recycled content, emissions reduction and circular design.  
REASON: To demonstrate that waste from demolition and carbon emissions are minimised and ensure that circular economy principles have been applied.
- 8 Before any works thereby affected are begun excluding demolition the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- a. details of Gravel Lane façade, including materials, fenestration and entrances;
  - b. details of the Cultural Artwork installation within the Gravel Lane elevation;
  - c. details of glazing and fenestration including the replacement glazing on the Gravel Lane facade;
  - d. details of Artizan Street façade, fenestration and entrances;
  - e. details of the proposed vehicle access gates;
  - f. details of external plant enclosures and plant;
  - g. details of external ducts, vents, louvres and extracts;
  - h. particulars and samples of materials to be used in all external surfaces of the building;
  - i. details of the podium landscaping proposals, including all surface materials;
  - j. details of the proposed community and garden rooms on the podium;
  - k. screening and plants in front of Petticoat Tower including damp-proofing.
- REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM10.2, DM10.3, DM10.4, DM10.8, DM12.1, DM12.3, DM17.1, DM19.2.
- 9 Prior to commencement of the relevant part of the development, details for the resident gym, garden room, residential estate office including a management plan to be provided, to include meetings room for residents to access, must be submitted to and approved in writing by the Local Planning Authority before the

above works are commenced. 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 agreed and approved by the local planning authority.

REASON: To demonstrate that waste from demolition and carbon emissions are minimised and ensure that circular economy principles have been applied.

- 10 Prior to the commencement of works including demolition, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority. Proposed finished floor levels at basement and threshold ground floor (threshold review) levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces, must be submitted and agreed with the Highways Authority. The development shall be carried out in accordance with the approved levels 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.

- 11 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 comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2036 policy OS3 Biodiversity.

- 12 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 bedrooms does not exceed NR30 attributable to the proposed use of the ground floor and/or basement levels. 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.

- 13 (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.



- 14 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.
- 15 Prior to the installation of any generator. A report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. Where it is not possible to deploy alternatives, any diesel generators must be the latest Euro standard available.  
The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose and shall not be used at any other time.  
REASON: In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.
- 16 Before any works thereby affected are begun excluding demolition the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- a. details of public art and/or historic display on the Gravel Lane façade, including materials and visuals;
  - b. to include details of how consultation has informed the final proposal;
  - c. management and maintenance;
  - d. a programme for the displays.
- REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1; DM10.8, DM11.2.
- 17 Details of a Delivery and 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 Delivery and 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. The Delivery and Servicing Management Plan must make provision for:
- A maximum number of 12 deliveries per day (which includes facilities management vehicles).
- The plan shall include any associated necessary works to the highway to be carried out prior to occupation of the development.
- The approved measures shall be maintained, in accordance with the Plan, for the duration of the use, unless the prior written approval of the Local Planning Authority is first obtained.

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 and DM16.5 of the adopted Local Plan.

- 18 Details of a full Cycling Promotion Plan, to include detail on specific measures taken to encourage cycling, shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the building hereby permitted. Within 6 months of first occupation a full Cycling Promotion Plan shall be submitted to and approved in writing by the Local Planning Authority. The building shall thereafter be operated in accordance with the approved Cycling Promotion Plan (or any amended Cycling Promotion Plan that may be approved from time to time by the Local Planning Authority) for a minimum period of 5 years from occupation of the premises. Annual monitoring reports shall be submitted to the Local Planning Authority during the same period.  
REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM16.1.
- 19 Details of the cycle parking facilities shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the building hereby permitted. The cyclist facilities shall thereafter be operated in accordance with the approved details for the life of the building.  
REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM16.1.
- 20 Details of the waste storage facilities demonstrating the arrangements for 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 details for the life of the building.  
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.
- 21 Prior to the occupation of the buildings, details of an Access Management Plan shall be submitted to and approved in writing by the local planning authority. The development shall then be implemented in accordance with the approved details and be retained as such in perpetuity.  
REASON: To ensure that the development will be accessible for people with disabilities in accordance with the following policy of the Local Plan: DM10.8. 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 works thereby affected are begun excluding demolition the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- a. details of level access from the Blue/Red badge bay opposite through to the entrance core. Location of dropped kerbs should not be obstructed by bollards/planters;
  - b. details to ensure that disabled parking provision is maintained throughout construction.

- c. details for seating including a range of heights with arm and back supports, and options for single, grouped seats and tables.
- d. Where display material is to be shown in the shop windows this should avoid glare and be consistent with guidance on signs/ information boards in BS 8300 (2): 12. Details for exhibits are provided in alternative formats that are consistent with the principle of more than two senses (PAS 6463).
- e. details for inclusive play for a range of users.

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

- 23 All unbuilt surfaces, including the podium level and ground floor and landscaping, shall be treated in accordance with a landscaping scheme, including details of:

- a. Irrigation;
- b. Provision for harvesting rainwater run-off from road to supplement irrigation;
- c. Spot heights for ground levels around planting pit;
- d. Soil;
- e. Planting pit size and construction;
- f. Tree guards;
- g. Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development;
- h. details for impact of design on residential amenity and windows;
- i. podium level increase details with steps and level access points;
- j. lighting;

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 and residential amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2, DM21.3.

- 24 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.

- 25 A) Prior to relevant works, details of noise attenuation measures for siren testing at basement level must be submitted to and approved in writing by the Local Planning Authority to mitigate any noise impacts.  
B) Following installation but before occupation of the development, measurements of noise impacts in the development from the basement area 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. All constituent parts of the installed measures 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.
- 26 Within 6 months of completion of the development details of the measures to meet the approved Urban Greening Factor and the Biodiversity Net Gain scores, to include plant and habitat species, scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development.  
REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2036 policy OS2 City Greening and OS3 Biodiversity.
- 27 Prior to the commencement of the relevant works, a Lighting Strategy and a Technical Lighting Design, including for the podium/garden level, shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of:
- lighting layout/s;
  - details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure) and functional or ambient;
  - a lighting control methodology;
  - proposed operational timings and associated design and management measures to reduce the impact on the local environment, public realm, 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 intensity, typical illuminance levels, uniformity, colour appearance and colour rendering.
  - details of uniformity, colour to reduce the impact on light pollution and residential amenity.
- Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.  
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, emerging policies

DE1, DE2 and HL3 of the Draft City Plan 2036 and the City of London Lighting SPD 2023.

- 28 Within 6 months of completion of the development, details of the final landscaping design and an Ecological Management Plan, to include plant and habitat species (with data on coverage and biodiversity improvement), scaled drawings identifying measures and maintenance strategies, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained in accordance with the submission documents to ensure the approved standard is preserved for the lifetime of the development. The landscaping design should include, where possible, a strategy to preserve (or save and return) existing plants which hold significant community value.  
REASON: To support the environmental sustainability of the development and provide a scheme that will encourage biodiversity and facilitate improved climate resilience whilst ensuring these benefits are maintained in the long term.
- 29 Prior to occupation, security measures must be provided within the development, having being developed in consultation with residents, such as CCTV, lighting, entrances and improvements to secure access.  
REASON: To ensure safety and security in accordance with Local Plan policies CS3 and DM3.2.
- 30 A minimum of 43 residential car parking spaces including a minimum of three blue badge parking spaces shall be provided and maintained for the life of the development.  
REASON: To mitigate the transport impacts of the development.
- 31 The development shall be operated in accordance with the approved Operational Management Plan unless otherwise agreed in writing by the Local Planning Authority.  
REASON: To ensure that the development does not have an adverse impact and to ensure the good management of the venue to protect residential and local amenities in accordance with the following policies of the Local Plan: DM3.5, DM15.7, DM16.1, DM21.3.
- 32 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.
- 33 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.
- 34 Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants, and must

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

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

- 35 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the buildings sufficient to accommodate a minimum of 284 spaces including adaptable spaces. All doors on the access to the parking area shall be automated, push button or pressure pad operated. The cycle parking provided on the site must remain ancillary to the use of the buildings and must be available at all times throughout the life of the buildings 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, and emerging policy AT3 of the Draft City Plan 2036.

- 36 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.

- 37 Minimum of 20 electric charging points must be provided within the development 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.

- 38 Prior to occupation, the development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device.

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.

- 39 No doors, gates or windows at ground floor level shall open over the public highway.

REASON: In the interests of public safety.

- 40 The threshold of all vehicular 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: DM10.8, DM16.2.

- 41 The threshold of the private public realm and public route entrances 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: DM10.8, DM16.2.

42 The development shall provide:  
198 sq.m of community use (Use Class F2) including a resident gym and meeting room.  
REASON: To ensure the development is carried out in accordance with the approved plans.

43 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:

Proposed Basement Layout Plan: Drawing Nr 3671-RSP-EB01 B1-DR-A-10121 Rev PA1

Proposed Ground Floor Layout Plan: Drawing Nr 3671-RSP-EB01-GF-DR-A-10122 Rev PA4

Proposed 1st Floor Layout Plan: Drawing Nr 3671-RSP-EB01-01-DR-A-10123 Rev PA2

Gravel Lane - Proposed Elevation: Drawing Nr 3671-RSP-EB01-ZZ-DR-A-10141 Rev PA5

Artizan Street - Proposed Elevation: Drawing Nr 3671-RSP-EB01-ZZ-DR-A-10131 Rev PA4

Artizan Street - Proposed New Generator Flue Route: Drawing Nr 3671-RSP-EB01-ZZ-DR-A-10132 Rev PA1

Proposed Works to Gravel Lane Streetscape: Drawing Nr 3671-RSP-EB01-ZZ-DR-A-10140 Rev PA6

Podium landscape General arrangement plan: Drawing Nr TS095-AL-P-GA-01 Rev B

Podium landscape Accessibility plan: Drawing Nr TS095-AL-P-GA-04 Rev B

Podium landscape Existing and proposed planting by area: Drawing Nr TS095-AL-P-GA-05

3D Visuals - Podium Landscaping: Drawing Nr 3671-RSP-EB01-ZZ-DR-A-10151 Rev PA2

Proposed Highway Arrangement Gravel Lane: Drawing Nr 2022-4459-009

Proposed Highway Arrangement Vehicle Swept Path Analysis: Drawing Nr 2022-4459-TR40

Proposed Highway Arrangement Vehicle Swept Path Analysis: Drawing Nr 2022-4459-TR41

Site Access Security Works: Drawing Nr 3671-RSP-EB01-ZZ-DR-A-10130 Rev PA2

Basement - Residents' Parking Facilities: Drawing Nr 3671-RSP-EB01-B1-DR-A-90050 Rev PA1

Residents' Link Corridor: Drawing Nr 3671-RSP-EB01-ZZ-DR-A-90051 Rev PA1

Ground Floor Site Access Issues: Drawing Nr 3671-RSP-EB01-GF-DR-A-90040 Rev PA2

Devonshire Club - Residents' Cycle Facilities: Drawing Nr 3671-RSP-EB01-ZZ-DR-A-90041



## 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 This approval relates only to the details listed above and must not be construed as approval of any other details shown on the approved drawings.
- 3 **Roof gardens**  
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.
- 4 **Compliance with the Clean Air Act 1993**  
Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.
- 5 **Generators and combustion plant**  
Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: [Medium combustion plant and specified generators: environmental permits - GOV.UK](#).
- 6 **Thames Water Advice:**

#### Waste Comments:

With regard to surface water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water, there would be no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021.

Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to the Thames Water website.

Thames Water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991.

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 the Thames Water website. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

#### Water Comments:

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at [thameswater.co.uk/buildingwater](http://thameswater.co.uk/buildingwater).

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.

- 7 The Health and Safety Executive have provided a response dated 17/10/2023 which includes various recommendations for fire safety at the site which the Applicant should review.
- 8 As recommended in the Equalities Statement prepared by the Applicant, further engagement materials should be provided in a range of languages.

## **Background Papers**

### **Representations**

CoLAT response received 06.09.2023.

Email from Thames Water received 06.09.2023.

Email from TFL dated 23.01.2023 and 06.11.2023.

Email from London Underground and DLR received 19.09.2023.

Email from Greater London Archaeological Service dated 22.09.2023 and 07.11.2023.

Email from City of London Archaeological Trust date 06.09.2023.

Memo from the Lead Local Flood Authority dated 06.09.2023.

Email from Cleansing Team dated 16.09.2023.

London Borough of Tower Hamlets dated 19.09.2023.

London Underground response received 19.09.2023.

Letter from Health and Safety Executive dated 17.10.2023.

Memo from Air Quality Officer dated 14.11.2023.

Memo from the Environmental Health team dated 22.01.2024.

Email from the Environmental Health team dated 09.01.2024.

### **Comments / letters received from:**

Alesandro Cardenas Tobon

Julian Thornton

Laura Chan

Mr Roger Way

Mr Cristian Medeiros

Miss Amy Banim

Darren Jones

Mrs Iris Jones

Mr Edward Hall

Margaret O'Brien

Robert Fox and Julie Fox

Miss Astrid Kirchner

Dr Alex Bayliss

E Young

Edward (Ted) Hall

Gerry Curran

Soo Cheong

Suly Gomez

Mrs Samapti Bagchi

Mr Sean Lee

Luz Adriana

Said Assassi

Abby Schofield

Clara Reo Sulekopa

Ian Hartog

Vicky Stewart

Mr Julian Bailey

Julia Da Costa

Margaret Lipton

Mr Thomas Cole

Miss Jasmine Liew

Ms Josephine Jago

Giopai Basgchi

Linda Fallon

Philomena Levy

Samapti Bagchi

Sanchila Bagchi

Mr Felice Livornese

Lucinda Martin

Mr Juan Castillo

Mr Peter Rawlinson

Jessica Sallabank

D Rose (on behalf of Middlesex Street Estate Residents Association)

D Rose (on behalf of Petticoat Square Leaseholders Association)

Merril Jenkins-Rose

Jeffrey Boloten

Mrs Natalie Coughlan

Mr Paul Coughlan

Mr Sean Coughlan

Mr Craig MacVicar

lisa Hollick

Miss Emily Coughlan

Robert Valenta

Anne Kilroy

Riley Kilroy Valenta

Miss Soo Cheong

Miss Sue Liew

Miss Jean Liew

Miss Yoke Liew

Mr Chee Seong Cheng

Mr Owen Bramley

Miss Amy Chan

Miss Kamila Lawcel

Mrs Gailie Anderson

Mr damien Vaugh

Mark Lemanski (Via Email)

David Rose  
Mr Mark Lemanski (Online)  
Mr Anthony Everton  
Miss Molly McPherson  
Dr Sharon Tugwell  
Mr Ian McPherson  
Janet Curry  
Kevin Curry  
Mr Paul Braithwaite  
Ms Sandra Mc Bean

Application documents

Application form.  
Details of leasehold landowners, September 2023.  
Schedule of area calculations for planning application, 28 July 2023.  
Covering letter dated 9 August 2023.  
Covering letter dated 1 December 2023.  
Planning Statement, August 2023.  
Eastern Base – constraints / evacuation management plan, 9 August 2023.  
Existing drawings.  
Community Infrastructure Form, 5 October 2023.  
Handling Note.  
Community Infrastructure Levy Form dated 05/10/2023.  
Transport Statement, August 2023.  
Air quality assessment, August 2023.  
Outline construction environmental management plan. August 2023.  
Outline construction logistics plan, August 2023.  
Equalities impact assessment, August 2023.

Outline delivery and servicing plan, August 2023.

Town centre use statement, July 2023.

Noise impact assessment, August 2023.

Ecological appraisal, July 2023.

Supplementary Transport Statement – Gravel Lane Works, November 2023.

City of London Police – Eastern Base – Middlesex Street. Operational Requirements – Site Criteria (Including Operational Management Plan) submitted January 2023.

Architectural Design and Access Statement, 1 August 2023.

Podium works – Design and Access Statement, August 2023.

Sustainability and Energy Statement, September 2023.

Flood risk assessment and surface water drainage strategy, August 2023.

3D Visuals – Podium landscaping.

3D Visuals – Street scenes.

Operational Requirements – Site Criteria, including Operational Management Plan.

Applicant response to objections dated 23.11.2023.

Fire Statement Form, Cahill Design Consultants.

Statement of Community Involvement, 8 August 2023.

Addendum to the Statement of Community Involvement, 29 September 2023.

Applicant responses to Public Comments for the MSE Eastern Base planning application, 23 November 2023.

Applicant collated responses to objections from emails on 13 October 2023.

Podium works – Design and Access Statement – Appendix 1 – Landscape Materials, November 2023.

Note on Artizan Street New Brickwork Elements.

Applicant response from 26 January 2024 to objection.

Technical Note – Siren Noise Assessment, 26.01.2024.

#### Other

Report to Community and Children's Services on 23 January 2023 for 'Middlesex Street Estate – Areas of Car Park and Seven Shop Units'.