

Committee:	Date:
Planning Applications Sub Committee	9 April 2024
Subject: Hill House, 1 Little New Street, London EC4A 3JR. Demolition of existing building above ground with retention of existing basement and piles/ foundations and erection of a mixed use office building comprising two basement levels, lower ground, upper ground and upper ground mezzanine plus 18 upper storeys for the provision of office space (Use Class E), gym/auditorium (Use Class E), flexible office, café/retail (Use Class E), reprovision of existing library (Use Class F1), flexible library/office (Use Class F1/E) and restaurant (Use Class E), discontinuance of the City Walkway (Little New Street To Wine Office Court), enhanced and enlarged public realm, hard and soft landscaping, highway works, and associated enabling works.	Public
Ward: Castle Baynard	For Decision
Registered No: 23/01102/FULMAJ	Registered on: 19 Oct 2023
Conservation Area: No	Listed Building: No

Summary

Existing site

The Site is located in the northwest of the City to the north of Fleet Street. The building is bounded on all sides by public highway with Little New Street to the north, Shoe Lane to the east, Wine Office Court to the south, and Printer Street and Gunpowder Square to the west.

The existing site comprises office use, a public lending library and a bar.

There is existing City Walkway through the centre of the Site from north to south; this is proposed to be removed as part of proposals. There are areas of permissive path located across the Site.

Proposals

The scheme would provide a total of 58,333 sq.m GEA floorspace, comprising 44,105 sq.m of office floorspace providing a significant amount of flexible Grade A floorspace, an uplift on the site of both quality and quantity of office floorspace.

The proposal will re-provide the existing public library at the site, with additional floorspace for flexible affordable workspace and library use.

The development would provide an uplift in retail floorspace with the provision of a retail/café unit at ground, and a restaurant at level 17.

The applicant would deliver a comprehensive landscaping scheme across the site, and at Gunpowder Square providing an enhanced entrance and public space directly adjoining the library, subject to a Section 278 Agreement.

This application is accompanied by an Environmental Statement.

Consultation

A total of 49 responses from the public were received. This comprised four objections and two neutral comments which raised residential amenity impacts including for daylight and sunlight, overlooking, and relating to the construction period. Officers have considered these issues and recommended conditions and Section 106 obligations to mitigate impacts.

A total of 43 responses were received supporting the proposals, these all state: "I am writing to share my support for the Hill House proposals" with some responses also highlighting support for the rooftop restaurant, new public realm and library proposals.

Sustainability

The proposed development would deliver a high quality, energy efficient development that is on track to achieve "outstanding" BREEAM assessment ratings. The proposals cannot meet the London Plan target of 35% operational carbon emission savings compared to a Part L 2021 compliant scheme which the GLA acknowledges will initially be difficult to achieve for commercial schemes. However, the proposed energy efficiency and the MEP strategy would perform highly, with an innovative façade system that would provide both operational and embodied carbon efficiency and an additional opportunity to use timber for internal elements.

The assessment of options, carried out in compliance with the Carbon Options Guidance 2023, confirmed that although the preferred proposal would result in the highest whole life-cycle carbon emissions out of the four options, none of the other options would be able to deliver the holistic sustainability benefits that would complement the repositioning of the emerging Fleet Valley area into a vibrant, healthy and sustainable new part of the City. The planning stage whole life-cycle carbon emissions are calculated to reach close to the GLA's Aspirational Benchmark, and opportunities to maximise the reuse of deconstruction materials from the site and from other reuse sources have been identified to mitigate impacts of redevelopment. The proposal therefore would satisfy the GLA's circular economy principles and London Plan policy, Local Plan policy, and Draft City Plan 2040. The building design responds well to climate change resilience by reducing solar gain, saving water resources and various opportunities for urban greening and biodiversity and complies with London Plan Policies Local Plan policies.

There will be a loss of four existing trees at the site at Gunpowder Square however these are considered to be of a low quality and the applicant is proposing approximately 28 trees across the site and will be required to deliver at least four trees with larger canopies in the new public realm at Gunpowder Square, alongside significant public realm and greening improvements. This would be secured in the Section 106 and Section 278 agreements.

Transport

The trip generation assessment identifies that the proposed development would generate 976 trips during the AM peak (8:00-9:00) and 1,156 trips during the PM peak (17:00-18:00). When considered against the existing site and associated trip generation, this is an increase of +635 trips during the AM peak and +786 trips during the PM peak.

Given the accessibility of the site in relation to local public transport services, and when considering the projected mode share of trips, it is considered that this additional level of activity could be absorbed by the existing transport networks, subject to appropriate mitigation and improvements to local footway conditions.

The applicant has committed to consolidate deliveries which would reduce the number of servicing vehicles arriving on site and result in a total of 49 deliveries per day (or a net increase of 14 trips when compared to the existing scenario). A daily servicing vehicle cap would be applied to the proposals. The Applicant also commits to restricting servicing activity between the peak network hours.

The applicant would provide a minimum of 750 long-stay cycle parking spaces internally, and 113 short-stay cycle parking spaces across internal and external spaces which meets the London Plan requirement. In addition, the applicant would also re-provide / retain the additional 24 existing cycle parking spaces that are located on Wine Office Court in the improved public realm.

The development will be car free however the applicant proposes to provide two additional disabled bays on-street on Little New Street, and the applicant has committed to providing EV charging capabilities for the proposed on-street bays.

The proposals will result in the loss of City Walkway (174 sqm) through the centre of the site, which is considered to be of poor quality with relatively low usage.

Local Plan Policy DM 16.2 resists the loss of pedestrian routes unless an alternative public pedestrian route of at least an equivalent standard is provided. An alternative route is not proposed by the applicant, and it could therefore be considered that there is some element of non-compliance of the aforementioned policy. However additional public realm space is to be re-provided (194 sqm) around the periphery of the building as part of an enhanced public realm.

The pedestrian comfort results indicate that there is to be no change in the pedestrian comfort level of the assessed footways at Little New Street and Shoe Lane and there will be a slight reduction in the pedestrian comfort level for Printer Street, which is considered immaterial and is still within an acceptable and comfortable range. However Officers consider that footways should be considered in more detail as part of the proposed Section 278 works.

Enhancements to Gunpowder Square have been proposed, to create a much-improved public realm along the key pedestrian desire line between New Street Square and Fleet Street. The works to public highway would be secured through a Section 278 Agreement.

The transport proposals are considered acceptable subject to conditions and section 106 obligations, including Construction Logistics details, to mitigate impacts to nearby uses and residents.

Design and Heritage

The Twentieth Century Society and the City of Westminster objected to the proposals on heritage grounds. Historic England responded to the consultation raising concerns on heritage grounds and identifying harm to

heritage assets. In addition, St Paul's Cathedral responded to identify harm to heritage assets.

The City's long-term, plan-led approach to tall buildings is to cluster them to minimise heritage impacts and maximise good growth. As such, the adopted Local Plan seeks to consolidate tall buildings into a singular, coherent City Cluster (Local Plan policies CS7 and CS14 (1)), an approach carried forward in the emerging City Plan 2040 with the addition of a smaller proposed Cluster in the Holborn and Fleet Valley area (S12 (2) and S21).

The application site falls outside the 'Eastern Cluster/City Cluster' policy areas in the adopted Local Plan and emerging City Plan (CS7, fig. G; S21, fig. 28), but does fall within the proposed Holborn and Fleet Valley Cluster in the emerging City Plan (S12, fig. 14). At 94.80m AOD, the proposal would exceed the highest of the contours of the proposed cluster (90m AOD) by 4.8m and would therefore create a degree of conflict with emerging policy S13 (3) of the 2040 Plan. This Plan is yet to undergo Regulation 19 Consultation and consequently its provisions can be afforded only limited weight as a material consideration.

Having conducted a detailed assessment of the potential impacts of the proposal, officers conclude that the site would be appropriate in principle for a tall building.

Officers consider that the architectural design of the building would be compatible with the existing context, being read as a well-layered piece of design, which celebrates moments in the public realm. Officers consider that the sculptural form of the building's massing, which breaks the building down into a series of different elements is successful, and responsive to its context, while also delivering a unique piece of architecture with its own identity and well-articulated facades.

Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate employment growth and would increase the amount of high-quality office space. The proposals align with the function of the City to accommodate substantial growth in accordance with Local Plan Policies CS1: Offices and London Plan Policies SD4, SD5 and E1.

The architecture and urban design proposals comply with Local Plan Policies CS10 and DM10.1, DM19.1 emerging City Plan Policy S8, DE2, HL1, DE3, and London Plan Policy D3 and D8, paragraphs 130 and 132 of the NPPF and the City Public Realm SPD all require high-quality public realm and increased urban greening.

Following rigorous assessment, officers consider that the proposal would preserve all relevant strategic views in accordance with London Plan Policy CS13, City Plan policy S13 London Plan Policy HC4 and associated guidance in the LVMF SPG and Protected View SPD. The proposal would not harm the characteristics and composition of relevant strategic views and their landmark elements.

Furthermore, the proposals would preserve the significance (via change in the setting) of heritage assets and an appreciation of it. As such, they would accord with Local Plan policies CS12 and DM12.1, emerging City Plan 2040 policies S11 and HE1, London Plan policy HC1, having accounted for and paying special regard to s.66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant NPPF policies.

Environmental impacts

Two wind assessments were undertaken: a Computational Fluid Dynamics (CFD) and Wind Tunnel. No wind safety risks were identified associated with the proposed development.

For the wind tunnel, with the inclusion of the proposed development the majority of locations would have wind conditions suitable for the intended use. Bench seating by the gym/auditorium entrance and higher-level terrace locations would have wind conditions one category windier than suitable. With the existing and proposed landscaping in place, all ground level locations would have suitable wind conditions for the intended use and no mitigation would be required. On the terrace levels the majority of areas would have suitable wind conditions for terrace use, however, a number of locations would have wind conditions windier than suitable for amenity use. Mitigation measures have been suggested and with these mitigation measures in place it is expected that wind conditions would be suitable for the desired amenity uses.

The CFD found that conditions will be either suitable for the intended use or no windier for the baseline conditions, without landscaping or mitigation measures, for all thoroughfares, building entrances (both proposed and existing off-site), existing off-site amenity (both ground level and elevated terraces), the proposed benches by the main entrance lobby, the proposed benches in Gunpowder Square, and the majority of the proposed elevated terraces (up to level 14, plus level 18). The baseline conditions which are unsuitable would be made suitable by the proposed Development for existing benches adjacent to 1 New Street Square and 120 Fleet Street, and on Stonecutter Street. Conditions for the proposed level 15 and 16 terraces would have regions which are not suitable when tested without the proposed landscaping, but would be made suitable by the inclusion of the proposed

landscaping scheme. Conditions for the proposed level 17 terrace would not be suitable when tested without the proposed landscaping, but would be made suitable for use as a mixed-amenity terrace by the inclusion of the proposed landscaping scheme. Should spill-out restaurant seating be required in detailed design, it is recommended that screening is incorporated into the terrace design at that stage. A condition to secure wind mitigation is proposed. Conditions for the proposed bench outside the flexible gym/auditorium entrance would be a category windier than the target without the proposed landscaping, but would be made suitable with the inclusion of the proposed landscaping scheme.

For the CFD, at 120 Fleet Street, there is a small area shown to the north of building on the western elevation for uncomfortable conditions shown in the windiest season only. This is shown on the façade of the proposed retail unit to the side of the entrance. The consultant states there is a highly localised region of red “uncomfortable” conditions does not extend more than 500mm from the wall of 120 Fleet Street, therefore is not of sufficient extent to impact the pedestrian experience in this area and is therefore considered negligible. This region was picked up in the CFD analysis, but was not picked up by the wind tunnel testing due to being such a localised region that it fell between probe locations.

Therefore subject to condition and s106 obligation, the wind microclimate impacts are considered acceptable.

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

A Solar Glare Assessment has been submitted. It states that occurrences of solar glare at angles beyond 30 degrees would be of little significance in most situations and if the angle between the driver’s line of view and the reflected sun is less than 10 degrees, solar glare could be a significant issue. The analysis states that the likelihood of experiencing solar glare throughout the year is relatively minimal, and even in cases where it does occur, it is at angles greater than 30 degrees. Therefore impacts are considered acceptable.

With regard to impacts on daylight and sunlight to nearby residential properties, for Pemberton House, 7 Wine Office Court and 1-23 Bolt Court, these would experience Minor to Major Adverse effects. Despite failures against the BRE guidelines, it is not considered that the proposal would result in an unacceptable impact on the existing use of the properties in the context of the location of the site in a dense urban area. In addition, an independent

review was undertaken for the results that concluded that the results are not considered unacceptable in the urban context. As such, the impacts are considered to be such that to cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE7 of the draft City Plan 2040.

Local Plan Policy DM15.7 and draft City Plan 2040 policy DE8 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers. An assessment of lighting impacts was undertaken by the applicant and identifies sensitive receptors at Pemberton House including bedrooms which face towards the Site. An assessment of the likely significant light intrusion effects of the proposed development are of moderate to major adverse significance. However the assessment assumed a 'typical' lighting design and also assumed that all lights are switched on at the same time and no blinds or shading devices are installed, and assumes that all lights remain on after 11pm. Therefore the assessment states that this represents a reasonable worst case scenario and the effects are likely to be materially lower in reality when one takes into account of a mitigation scheme that would be deployed as part of good building management practices.

The applicant states that the lighting will be designed to reduce the potential effects on residents of Pemberton House, such that the likely effect of the proposed development after mitigation will likely be minor adverse and therefore not significant. Conditions are recommended to ensure that impacts to residents and other sensitive receptors are mitigated including compliance with the Lighting SPD. Subject to detailed design and conditions, the impacts are considered acceptable.

Benefits

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

There are a range of public benefits associated with the proposal which includes the delivery of:

- An enhanced library offer with potential to generate income from meeting rooms;
- Potential for affordable workspace at the site to be managed by the library to generate income;
- Exclusive managed use of the level 18 amenity space and rooftop for library use and for community events;
- A Changing Places Toilet;

- A flexible gym/ auditorium use with offer for discounted use for qualifying groups and users;
- Public realm improvements including an enhanced Gunpowder Square subject to s278 agreement;
- Provision of public art.

Planning obligations

The S106 agreement will secure the reprovision of the library at Hill House and the temporary relocation during construction at One New Change, subject to the grant of planning permission.

Financial security in the form of a payment or guarantee will be given by the applicant to ensure that the Corporation can deliver a library in the event that the applicant fails to deliver in accordance with the agreed timetable. The applicant would meet the costs and carry out works for fit out and furnish both the temporary and permanent library.

New lease terms would include a peppercorn rent throughout the 65 year term with a reasonable cap on service charge to be agreed with better commercial terms than the existing lease.

Conclusion

The principle of high-quality Grade A office, reprovision of a library, flexible retail and gym/auditorium floorspace are acceptable and would be secured through condition.

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.

Other material considerations, including the application of policies in the NPPF and the significant weight to be placed on the need to support

economic growth (paragraph 85), also indicate that planning permission should be granted.

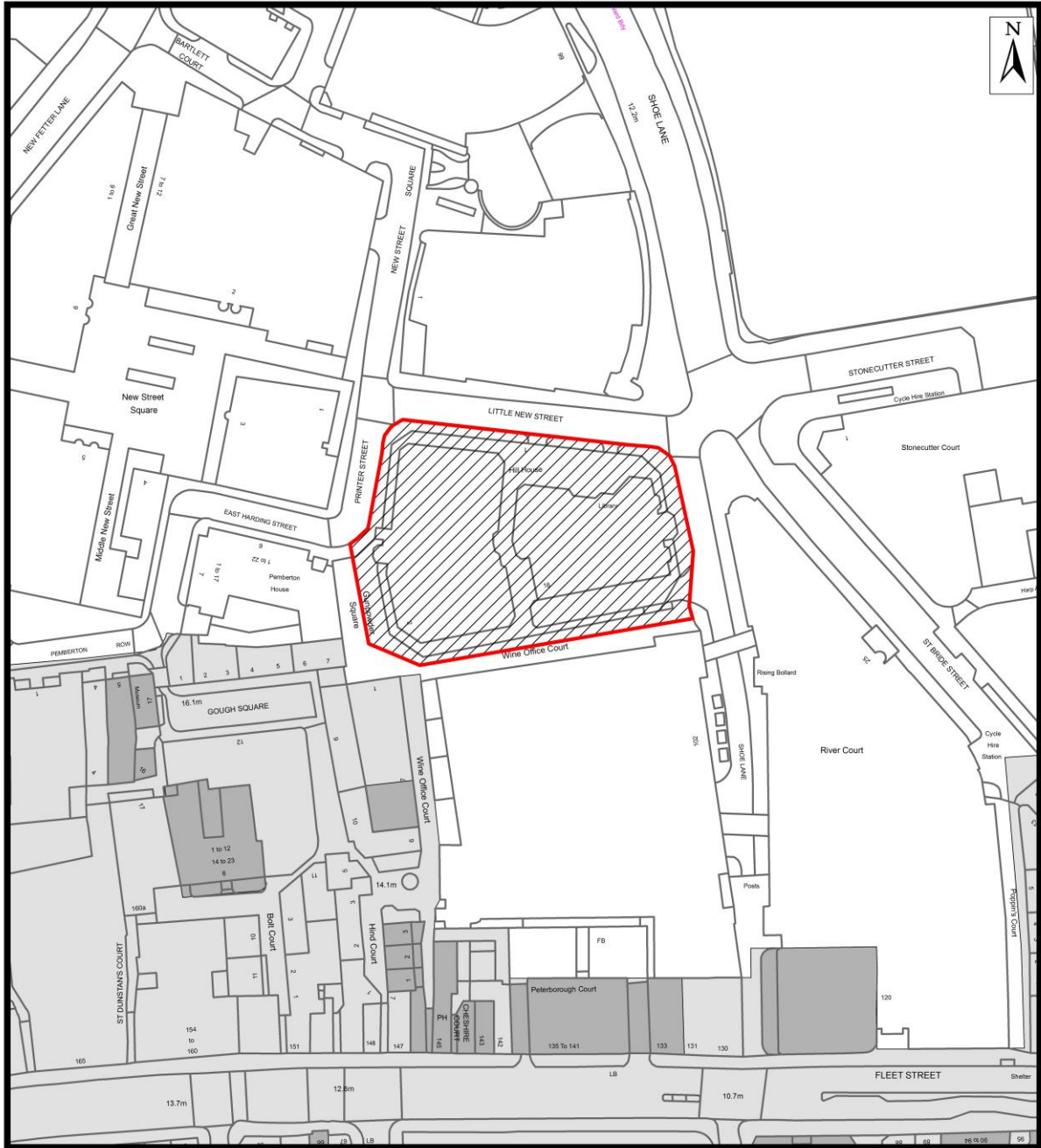
Although there is some non-compliance with parts of the tall building and pedestrian movement policies, it is the view of Officers that the proposal complies with the Development Plan when considered as a whole and that material planning considerations weigh in favour of the scheme.

Therefore, it is recommended that planning permission be granted subject to all the relevant conditions being applied and Section 106 obligations being entered into in order to secure the benefits and minimise the impact of the proposal.

Recommendation

1. That, subject to the execution of a planning obligation or obligations in respect of the matters set out under the heading 'Planning Obligations' 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; and
2. That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 of the Town and Country Planning Act 1990 and any necessary agreements under Sections 278 and 38 of the Highway Act 1980 in respect of those matters set out in the report.
3. That your Officers be authorised to provide the information required by regulations 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

Site Location Plan



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ADDRESS:
Hill House, 1 Little New Street

CASE No.
23/01102/FULMAJ

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



ENVIRONMENT DEPARTMENT

Image 1: Aerial view of site looking north-west.



Image 2: View looking southwest from Stonecutter Street.



Image 3: View looking south from Printer Street into Gunpowder Square.

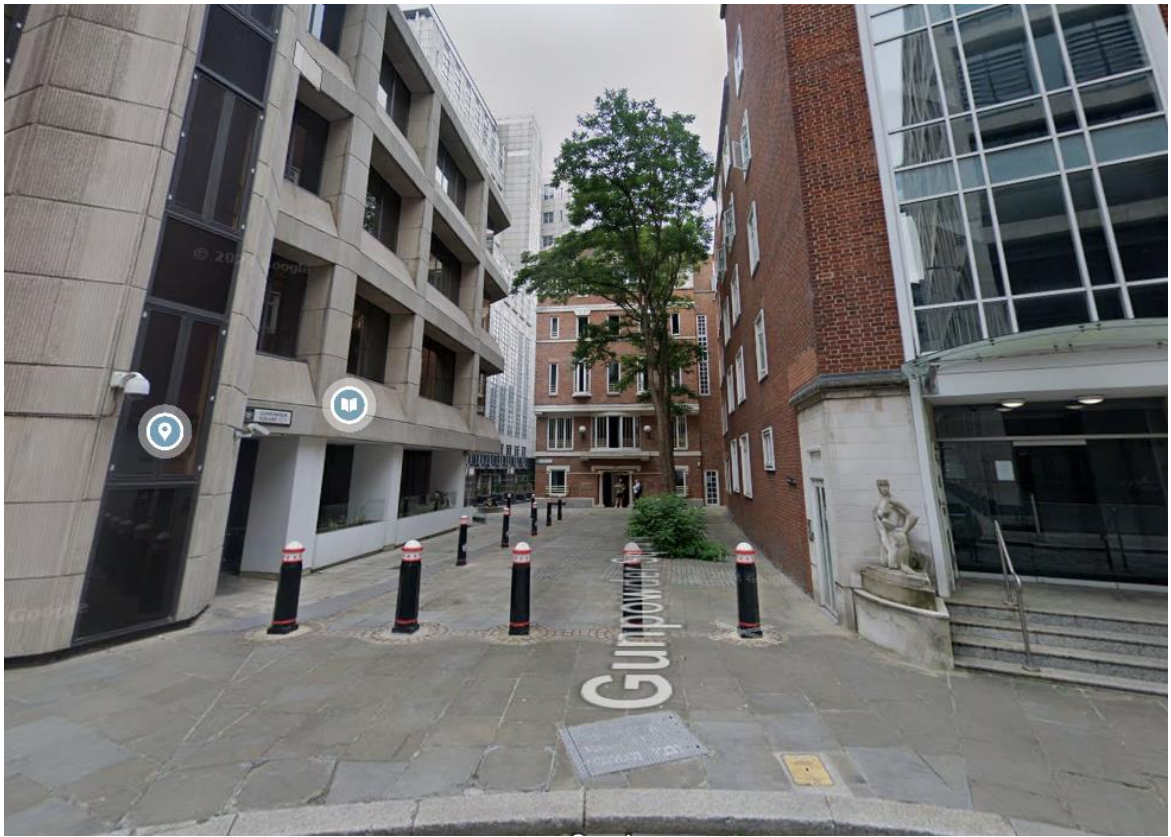


Image 4: Visual of proposed development looking northeast.



Image 5: Visual of the library use at the proposed development.



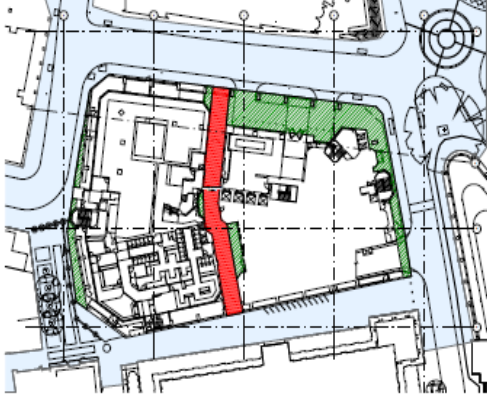

Image 6: Visual of proposed development at Gunpowder Square.



Image 7: Visual of proposed library entrance at Gunpowder Square.



Application Sheet: Hill House

TOPIC	INFORMATION					
1. HEIGHT	EXISTING		PROPOSED			
	49.33m AOD		94.8m			
2. FLOORSPACE GIA (SQM)	USES		EXISTING		PROPOSED	
	Office (Use Class E)	15,842.4	Office (Use Class E)	43,341		
	Bar (Sui Generis)	1,014.2	Flexible Office/Café/Retail (Use Class E)	319.7		
	Library (Use Class F1)	1,016.4	Library (Use Class F1)	1,040.7		
			Flexible Library/Office (Use Class F1/E)	467.5		
			Flexible Gym/Auditorium (Use Class E)	460.7		
			Restaurant (Use class E)	823.4		
	Ancillary/Back of House	6,836.3	Ancillary/Back of House	10,829.2		
Total	24,709.6		57,056.5			
3. OFFICE PROVISION IN THE CAZ	An increase of at least 27,498.6 sqm GIA of office floorspace in the CAZ. A potential for 467.5 sqm GIA additional affordable workspace.					
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED			
	20		Estimated 2,986			
5. VEHICLE +CYCLE PARKING	Blue Badge	1	Blue Badge	3		
	Cycle Parking	24	Long Stay Cycle Parking	750		
			Short Stay Cycle Parking	113		
6. HIGHWAY LOSS / GAIN	There is no highway loss proposed. There is a loss of City Walkway proposed. However there would be an increase of 52 sqm of new public realm (permissive path) compared to the existing development.					
	 Existing Arrangement		 Proposed Development			

7. PUBLIC REALM	Public realm improvements around the site including at Gunpowder Square, subject to S278 Agreement.	
8. STREET TREES	EXISTING	PROPOSED
	4	Approximately 28 subject to detailed landscape design with at least four with large canopy in Gunpowder Square.
9. DAILY SERVICING VEHICLE TRIPS	EXISTING	PROPOSED
	35 deliveries (70 trips)	49 deliveries (98 trips). This assumes 50% consolidation and 5% of all trips undertaken by cargo bike.
10. SERVICING HOURS	Deliveries will take place outside the peak hours (07:00-10:00, 12:00-14:00 and 16:00-19:00).	
11. RETAINED FABRIC	Substructure – 90% by mass retention Superstructure – 0 % retention	
12. OPERATIONAL CARBON EMISSION SAVINGS	Improvements against Part L 2021: 13% GLA requirement: 35%	
13. OPERATIONAL CARBON EMISSIONS	35,216.6 tonnes CO ₂ over 60 years 0.617 tonnes CO ₂ per square meter over 60 years (includes life-cycle modules B6+B7)	


14. EMBODIED CARBON EMISSIONS

PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS

Benchmark	Upfront Embodied Carbon (A1-A5) [kg CO ₂ e/m ²]	In-use Stage Embodied Carbon (B-C) [kg CO ₂ e/m ²]	Total Embodied Carbon [kg CO ₂ e/m ²]
GLA Benchmark	950	450	1,400
GLA Aspirational	600	370	970
Hill House	645	350	995

A1-A5: upfront embodied carbon emissions per square meter
B – C (excluding B6 and B7): in use stage embodied carbon emissions per square meter

Total upfront embodied carbon 36,817.8 tonnes CO₂e / 645 kgCO₂e per sqm

15. WHOLE LIFE CYCLE CARBON EMISSIONS	<p>Total whole life-cycle carbon emissions: 92,019.3 tonnes CO₂</p> <p>Total whole life-cycle carbon emissions per square meter: 1.612 tonnes CO₂/sqm</p>																																																																																
16. WHOLE LIFE-CYCLE CARBON OPTIONS	<div style="text-align: center;">  </div> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Option Reference</th> <th style="text-align: center;">B1</th> <th style="text-align: center;">B2+</th> <th style="text-align: center;">B3+</th> <th style="text-align: center;">C</th> </tr> </thead> <tbody> <tr> <td>Project Reference Period</td> <td style="text-align: center;">60</td> <td style="text-align: center;">60</td> <td style="text-align: center;">60</td> <td style="text-align: center;">60</td> </tr> <tr> <td>Gross Internal Area (GIA) m²</td> <td style="text-align: center;">25,264</td> <td style="text-align: center;">43,879</td> <td style="text-align: center;">50,647</td> <td style="text-align: center;">50,834</td> </tr> <tr> <td>Net Internal Area (NIA) m²</td> <td style="text-align: center;">12,958</td> <td style="text-align: center;">25,762</td> <td style="text-align: center;">27,283</td> <td style="text-align: center;">28,207</td> </tr> <tr> <td>Change to NIA compared to existing m²</td> <td style="text-align: center;">1,185</td> <td style="text-align: center;">13,989</td> <td style="text-align: center;">15,510</td> <td style="text-align: center;">16,434</td> </tr> <tr> <td>Substructure % retained by mass</td> <td style="text-align: center;">100</td> <td style="text-align: center;">99</td> <td style="text-align: center;">93</td> <td style="text-align: center;">91</td> </tr> <tr> <td>Superstructure % retained by mass</td> <td style="text-align: center;">90</td> <td style="text-align: center;">46</td> <td style="text-align: center;">32</td> <td style="text-align: center;">0</td> </tr> <tr> <td>Total WLCA (inc. B6 & pre-demo) <small>(kgCO_{2e}/m² GIA, B7 not included)</small></td> <td style="text-align: center;">1,389.4</td> <td style="text-align: center;">1,525.4</td> <td style="text-align: center;">1,632.4</td> <td style="text-align: center;">1,678.4</td> </tr> <tr> <td>Upfront Embodied Carbon (A1-A5) <small>(kgCO_{2e}/m² GIA)</small></td> <td style="text-align: center;">297</td> <td style="text-align: center;">425</td> <td style="text-align: center;">527</td> <td style="text-align: center;">563</td> </tr> <tr> <td>In Use Embodied Carbon (B-C) <small>(kgCO_{2e}/m² GIA)</small></td> <td style="text-align: center;">356</td> <td style="text-align: center;">356</td> <td style="text-align: center;">356</td> <td style="text-align: center;">356</td> </tr> <tr> <td>Operational Carbon for building lifetime (B6) <small>(kgCO_{2e}/m² GIA)</small></td> <td style="text-align: center;">734.4</td> <td style="text-align: center;">734.4</td> <td style="text-align: center;">734.4</td> <td style="text-align: center;">734.4</td> </tr> <tr> <td>Total WLCA (inc. B6 & pre-demo) <small>(tCO_{2e}, B7 not included)</small></td> <td style="text-align: center;">35,102</td> <td style="text-align: center;">66,933</td> <td style="text-align: center;">82,676</td> <td style="text-align: center;">85,320</td> </tr> <tr> <td>Total Existing Building Demolition <small>(tCO_{2e})</small></td> <td style="text-align: center;">51</td> <td style="text-align: center;">439</td> <td style="text-align: center;">760</td> <td style="text-align: center;">1,271</td> </tr> <tr> <td>Upfront Embodied Carbon (A1-A5) <small>(tCO_{2e})</small></td> <td style="text-align: center;">7,503</td> <td style="text-align: center;">18,649</td> <td style="text-align: center;">26,691</td> <td style="text-align: center;">28,620</td> </tr> <tr> <td>In Use Embodied Carbon (B-C) <small>(tCO_{2e})</small></td> <td style="text-align: center;">8,994</td> <td style="text-align: center;">15,621</td> <td style="text-align: center;">18,030</td> <td style="text-align: center;">18,097</td> </tr> <tr> <td>Operational Carbon for building lifetime (B6) <small>(tCO_{2e})</small></td> <td style="text-align: center;">18,554</td> <td style="text-align: center;">32,225</td> <td style="text-align: center;">37,195</td> <td style="text-align: center;">37,332</td> </tr> </tbody> </table>	Option Reference	B1	B2+	B3+	C	Project Reference Period	60	60	60	60	Gross Internal Area (GIA) m ²	25,264	43,879	50,647	50,834	Net Internal Area (NIA) m ²	12,958	25,762	27,283	28,207	Change to NIA compared to existing m ²	1,185	13,989	15,510	16,434	Substructure % retained by mass	100	99	93	91	Superstructure % retained by mass	90	46	32	0	Total WLCA (inc. 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Option Reference	B1	B2+	B3+	C																																																																													
Project Reference Period	60	60	60	60																																																																													
Gross Internal Area (GIA) m ²	25,264	43,879	50,647	50,834																																																																													
Net Internal Area (NIA) m ²	12,958	25,762	27,283	28,207																																																																													
Change to NIA compared to existing m ²	1,185	13,989	15,510	16,434																																																																													
Substructure % retained by mass	100	99	93	91																																																																													
Superstructure % retained by mass	90	46	32	0																																																																													
Total WLCA (inc. B6 & pre-demo) <small>(kgCO_{2e}/m² GIA, B7 not included)</small>	1,389.4	1,525.4	1,632.4	1,678.4																																																																													
Upfront Embodied Carbon (A1-A5) <small>(kgCO_{2e}/m² GIA)</small>	297	425	527	563																																																																													
In Use Embodied Carbon (B-C) <small>(kgCO_{2e}/m² GIA)</small>	356	356	356	356																																																																													
Operational Carbon for building lifetime (B6) <small>(kgCO_{2e}/m² GIA)</small>	734.4	734.4	734.4	734.4																																																																													
Total WLCA (inc. B6 & pre-demo) <small>(tCO_{2e}, B7 not included)</small>	35,102	66,933	82,676	85,320																																																																													
Total Existing Building Demolition <small>(tCO_{2e})</small>	51	439	760	1,271																																																																													
Upfront Embodied Carbon (A1-A5) <small>(tCO_{2e})</small>	7,503	18,649	26,691	28,620																																																																													
In Use Embodied Carbon (B-C) <small>(tCO_{2e})</small>	8,994	15,621	18,030	18,097																																																																													
Operational Carbon for building lifetime (B6) <small>(tCO_{2e})</small>	18,554	32,225	37,195	37,332																																																																													
17. TARGET BREEM RATING	<div style="text-align: center;"> <div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid black; padding: 5px; margin: 2px;">Good</div> <div style="border: 1px solid black; padding: 5px; margin: 2px;">Very Good</div> <div style="border: 1px solid black; padding: 5px; margin: 2px;">Excellent</div> <div style="border: 2px solid green; padding: 5px; margin: 2px; background-color: #d4edda;">Outstanding</div> </div> <p>Policy target Excellent or Outstanding</p> </div>																																																																																
18. URBAN GREENING FACTOR	<p>0.34</p>																																																																																
19. BIODIVERSITY NET GAIN	<p>517.33%</p>																																																																																
20. AIR QUALITY	<p>An all electric system is proposed for plant. The Air Quality Assessment confirmed that development is air quality neutral and that overall, with the recommended mitigation measures in place (construction phase only), the development would be compliant with legislation and policy.</p>																																																																																

Main Report

Environmental Statement

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

other person about the environmental effects of the development also form part of the environmental information to be examined and taken into account by your Committee.

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

Site and Surroundings

7. The Site is located in the northwest of the City to the north of Fleet Street. The building is bounded on all sides by public highway with Little New Street to the north, Shoe Lane to the east, Wine Office Court to the south, and Printer Street and Gunpowder Square to the west.
8. The existing building was completed in 1979 and comprises seven storeys above ground with two basement levels and has accommodated predominantly office floorspace over its lifetime. The total existing height is 49.33 metres above ordnance datum (AOD).
9. There is existing City Walkway through the centre of the Site from north to south which is proposed to be removed as part of proposals. There are areas of permissive path located across the Site.
10. The uses at existing site comprises:
 - Office use (15,842 sq.m GIA) – from lower ground to level six with the principal entrance facing Little New Street;
 - Library use (1,016 sq.m GIA) – at basement two level with entrance facing Little New Street;
 - Bar (1,014 sq.m GIA) – on lower and upper ground floor with entrance from Shoe Lane;
 - Gym for office use – on upper ground floor with entrance from Printer Street;
 - Loading bay and servicing area – ground and basement one;
 - Plant and back of house (6,837 sq.m GIA) – basement two, basement one, lower ground, upper ground, and level seven.
11. The site is not within a conservation area; however, the Fleet Street Conservation Area is located nearby to the southwest.
12. Part of the site sits within the London Panorama (5A.2) from Greenwich Park in the London View Management Framework (LVMF).

13. The building is not listed, however there are listed buildings nearby including no. 7 Wine Office Court (Grade II) and no. 17 Gough Square No 17, Dr Johnson's House (Grade I).
14. On 7th June, Historic England confirmed that the existing building is not recommended for listing and recommended that a Certificate of Immunity should be issued.
15. The surrounding area is comprised of predominantly commercial uses including office and retail. In addition, there are a number of residential properties near to the Site and this includes directly to the west at Pemberton House and southwest at Wine Office Court.
16. Existing blue badge bays are located on Little New Street to the north of the Site, a space on St Bridge Street to the east, and a space in Gough Square to southwest.
17. There is existing public realm at Gunpowder Square which includes three City managed trees.
18. Topographically the site slopes downwards to the east between Printer Street and Shoe Lane.
19. The existing servicing takes place from Shoe Lane via a dedicated loading bay.

Planning history

20. There is no relevant recent planning history at the Site apart from an application currently pending for the bar unit at the Site for a temporary community kitchen and exhibition space (app. ref. 24/00094/FULL).
21. Directly to the east of the Site is the consented 120 Fleet Street development which is currently under construction for the: Demolition of the existing River Court building at 120 Fleet Street, including part demolition of the basement and the erection of a new building comprising two basement levels and ground floor plus 20 upper storeys (93.15m AOD) including retail, commercial, office and service use (Class E). Creation of new pedestrian routes. Change of use of Daily Express Building from office (Use Class E) to learning and non-residential institutions use (Class F1), retail, flexible learning and non-residential institutions and commercial use (Class E), Alterations to and refurbishment of the existing Grade II* listed Daily Express Building at 120 Fleet Street, including works to detach the building from the River Court with demolition of part of linking floorplate and structure from basement level 01 to

level 06, demolition of roof and installation of new roof with associated roof garden, erection of new north facade, retention of south-east curved corner and part demolition of existing east facade from ground level to level 05, erection of new facade and shopfront and associated works.

Proposals

22. Planning permission is sought for the demolition of existing building above ground with retention of existing basement and piles/ foundations and erection of a mixed use office building comprising two basement levels, lower ground, upper ground and upper ground mezzanine plus 18 upper storeys for the provision of office space, gym/auditorium (Use Class E), flexible office, café/retail (Use Class E), reprovision of existing library (Use Class F1), flexible library/office (Use Class F1/E) and restaurant (Use Class E), discontinuance of the City Walkway (Little New Street To Wine Office Court), enhanced and enlarged public realm, hard and soft landscaping, highway works, and associated enabling works.
23. The existing basement slab at basement level two is proposed to be retained alongside the perimeter walls with other walls and structure to be demolished.
24. The scheme would provide a total of 58,411 sq.m GEA floorspace, comprising:
 - 44,110 sq.m of office floorspace (Class E(g(i)));
 - 336 sq.m of flexible retail (Class E(a-d));
 - 479 sq.m of flexible gym /auditorium use (Class E);
 - 1,066 sq.m of public library use (Class F1);
 - 515 sq.m of flexible affordable workspace and library use (Class E / F1).
25. The scheme would provide a significant amount of flexible Grade A office floorspace, an uplift on the site of both quality and quantity of office floorspace and an increase in the floorspace for other proposed retail and commercial uses.
26. The proposals would re-provide the public library at the site at ground and mezzanine level with an entrance from Gunpowder Square. This will include additional adjoining floorspace at mezzanine level for affordable workspace or library use.
27. The site would provide a restaurant at level 17 and café/retail at ground floor.
28. In addition, the proposed development would include a gym or auditorium use at basement level.

29. The servicing is proposed to take place from the same location as existing from Shoe Lane to the east of the Site.
30. Two additional blue badge spaces are proposed on Little New Street and cycle parking is proposed at ground floor and basement internally and in the public realm on Wine Office Court and at Gunpowder Square.
31. There would be new and enhanced public realm at Gunpowder Square and around the site, and terraces on levels 1 to 18. This would include urban greening and biodiversity measures. There would be an increase of public realm at ground level next to Gunpowder Square where the building line is pushed back to mitigate for the loss of City Walkway at the Site.

Consultations

Statement of Community Involvement

32. The Applicant has submitted a Statement of Community Involvement outlining their engagement with stakeholders. Public consultation took place via leafleting and in-person consultation events as well as digital engagement. A total of 241 attendees were present at December - July consultation events.
33. The Statement of Community Involvement concludes that the majority of attendees at the events were particularly interested in the public realm, library, and rooftop restaurant proposed and that the proposal to relocate Shoe Lane Library from its existing basement location to a highly prominent new home at ground floor level adjacent to Gunpowder Square was met with positive feedback.

Statutory Consultation

34. 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). Received letters and e-mails making representations are referenced in Appendix A to this report. A summary of the representations received, and the consultation responses is set out in the table below.
35. In accordance with the City's SCI, notification letters were sent to residential properties in the vicinity in addition to the site and press notices.
36. The application was advertised in accordance with the EIA Regulations 2017 (as amended).

37. The applicant has provided detailed responses to matters raised in consultee and third-party responses. All received letters and e-mails making representations are referenced in the appendix to this report.

External Consultation responses	
City Police	Responded and no comments.
City of Westminster	<p>Responded to state:</p> <p><i>We object to the impact of the proposals on the setting of the Grade I listed churches of St Mary Le Strand and St Clement Danes. When looking eastwards along the Strand toward the churches, the proposed development will be highly visible, and will be overbearing in relation to them and crowding in on them in the townscape.</i></p> <p><i>As is noted on page 199 of the Townscape, Heritage and Visual Impact Assessment, the area around the Church is a high-quality large area of public realm, and that it provides a "good quality view of two Grade I listed churches along the important primary route of the Strand which forms part of the historic processional route to St Paul's Cathedral", concluding that the value of the view is "accordingly high". We would agree with this assessment that the value of this view is high. The report however goes on to say that impact of the proposals on this view will be neutral as the proposed development "distinctly legible as a background element, and it will not dominate or alter the ability to appreciate the character and composition of the view or the landmark church within it". This is not accepted as an accurate statement of the effect of the proposals on the setting of the listed buildings. Currently when looking eastwards down the historic processional route to St Pauls, the churches are framed by the sky, which draws the eye up the spire and toward the heavens. The architecture of the churches is therefore in direct conversation with the sky. This development would reduce the amount of surrounding sky, resulting in a cluttered and lopsided surrounding townscape in long distance views which negatively impacts the viewers ability to appreciate the character and composition of the churches.</i></p> <p><i>This harm is tacitly acknowledged on page 82 of the Design and Access Statement which acknowledges that the redevelopment of the site would result in the loss of the sky-gap between St Mary-le-Strand church and 120 Fleet Street. It goes on to state that took on board that "the design should</i></p>

	<p><i>aim to minimise coalescence with 120 Fleet Street through elevation design and materiality. The height of the proposed scheme should not detract from the appreciation of the churches (St Mary-le-Strand & St Clement Danes) and their respective spires. The southwest elevation should be articulated to avoid appearing broad in these views".</i></p> <p><i>Whilst it is appreciated that this harm was acknowledged by the design team, and an attempt was made to mitigate the harm, this attempt was not successful. The approach taken fails to resolve the harm cause by the loss of the sky gap and the cluttering of the townscape.</i></p> <p>Officer response: This is addressed in the 'Design and Heritage' section of the report.</p>
Civil Aviation Authority	No response received.
Crossrail	Responded with no comment.
Dean And Chapter of St Paul's Cathedral	No response.
Environment Agency	<p>Responded to state:</p> <ul style="list-style-type: none"> - <i>Contaminated Land - This development site appears to have been the subject of past industrial activity (printworks and cast iron and glass manufacturing) which poses a medium risk of pollution to controlled waters. However, we are unable to provide site-specific advice relating to land contamination as we have recently revised our priorities so that we can focus on:</i> <ul style="list-style-type: none"> • <i>Protecting and improving the groundwater that supports existing drinking water supplies</i> • <i>Groundwater within important aquifers for future supply of drinking water or other environmental use.</i> - <i>We recommend that you refer to our published 'Guiding Principles for Land Contamination' which outlines the approach which should be adopted when managing this site's risks to the water environment. We also advise that you consult with your Environmental Health/Environmental Protection Department for advice on generic aspects of land contamination management. Where planning controls are considered necessary, we recommend that the environmental protection of controlled waters is considered alongside any human health protection requirements. This</i>

	<p><i>approach is supported by paragraph 174 of the National Planning Policy Framework. Water Resources Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills. We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments. Residential developments All new residential developments are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within the Building Regulations &c. (Amendment) Regulations 2015. However, we recommend that in areas of serious water stress (as identified in our report Water stressed areas - final classification) a higher standard of a maximum of 110 litres per person per day is applied. This standard or higher may already be a requirement of the local planning authority.</i></p> <p>Officer response: This is addressed in the ‘Land contamination’ section of the report. Conditions and informatives are recommended.</p>
<p>GLAAS, Historic England Archaeology</p>	<p>A response was provided that stated no further assessment was required.</p> <p>Officer response: A condition is recommended.</p>
<p>Greater London Authority</p>	<p>Responded to state that: whilst the proposal exceeds the threshold plane of this protected view, it is not considered that the proposal would have significant impact on or cause harm to the protected landmark in this view, and it is not therefore considered that the amendments give rise to any new strategic planning issues; therefore, under article 5(2) of the above Order the Mayor of London does not need to be consulted further on this application and the City may proceed to determine the application without further reference to the GLA.</p>

<p>Heathrow Airport</p>	<p>Responded to state:</p> <ul style="list-style-type: none"> - <i>Obstacle Lighting - Although it is not anticipated that the use of a cranes at this site will impact Heathrow's Obstacle Limitation Surfaces, Instrument Flight Procedures or Radar. We would like to advise the developer that if a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane, as per the requirements set out by CAP1096.</i> - <i>CAA Crane Notification - where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification. The following details should be provided before the crane is erected:</i> <ul style="list-style-type: none"> • <i>the crane's precise location</i> • <i>an accurate maximum height</i> • <i>start and completion dates</i> <p>Officer response: Conditions are recommended.</p>
<p>Historic England</p>	<p>Detailed response was received, including the following:</p> <ul style="list-style-type: none"> - <i>Whilst we have no objection to the redevelopment of the current building on the site, we consider that due to their height of the proposed replacement building, it would have a harmful impact upon the significance and setting of a number of heritage assets, particularly the Grade I listed churches on The Strand and surrounding conservation areas. If your authority is minded to approve these proposals we recommend that you seek to ensure that the proposals are fully justified and weighed in the balance against any public benefits arising from the proposals, in accordance with policies set out in the NPPF.... We consider the level of harm to be less than substantial in NPPF terms, but towards the middle range... Historic England has concerns regarding the application on heritage grounds."</i> <p>Officer response: This is addressed in the 'Design and Heritage' section of the report.</p>
<p>Lead Local Flood Authority</p>	<p>Responded with conditions.</p> <p>Officer response: Conditions are recommended.</p>

London City Airport	<p>Responded to state:</p> <ul style="list-style-type: none"> - <i>“London City Airport has now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development. However, as a crane is needed for construction purposes, we would like to draw your attention to the following:</i> - <i>Obstacle Lighting - Although it isn’t anticipated that the use of a cranes at this site will impact London City Airport’s Obstacle Limitation Surfaces, Instrument Flight Procedures or Radar. We would like to advise the developer that if a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane, as per the requirements set out by CAP1096. CAP 1096: Guidance to crane users on the crane notification process and obstacle lighting and marking.</i> - <i>CAA Crane Notification where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification.</i> <p>Officer response: Conditions are recommended.</p>
London Borough of Camden	Responded with no objections.
London Borough of Islington	No response received.
London Borough of Lewisham	No response received.
London Borough of Tower Hamlets	Responded with no comments.
London Borough of Southwark	Confirmed no comments.
London Underground	No response received.
Ministry of Housing,	No response received.

Communities and Local Government	
National Air Traffic Services (NATS)	<p>Responded to state:</p> <ul style="list-style-type: none"> - <i>The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal. However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application.</i>
Natural England	Responded with no comments.
Network Rail	<p>Responded with detailed advice.</p> <p>Officer response: An informative has been recommended.</p>
Royal Borough of Greenwich	Responded with no objections
Thames Water	<p>Responded with detailed advice and recommended conditions and informatives.</p> <p>Officer response: Conditions and informatives are recommended.</p>
The City of London Archaeological Trust	Responded with no comments.
The Gardens Trust	Responded with no comments
Transport for London	<p>Responded with detailed response including to state:</p> <ul style="list-style-type: none"> - <i>Trip Generation and Public Transport Impact</i> <i>The trip generation exercise was undertaken for the office and restaurant uses, concerns over missing trip generation figures for the gym, library and retail. A mode share sensitivity study using nearby comparison sites has been undertaken to sense check 2011 census mode split, and the resultant mode share split for AM and PM peak hours is considered robust. Public transport trip generation figures have been split out by station, line or direction as outlined within TfL's latest Healthy</i>

Streets TA guidance which is welcomed. It is accepted that additional trips generated by the scheme are unlikely to have a specific adverse impact on the strategic transport network.

- *TfL question the proposed 750 cycle parking spaces, given the proposed office trip generation modal split is at 4.1%, this percentage is very low given the aspirations of the Mayors Transport Strategy. Further discussion and work may be required regarding the trip generation and public transport impact.*
- *Healthy Streets and public realm*
TfL welcomes that there has been a Pedestrian Comfort Level assessment and recognises the importance of the removal / changes made to the City Walkway. Regarding pedestrian access, there has been a reprovision of a new 24/7 footway around the periphery of the site, enhancing public realm, with active frontages across a 5 to 10 minute all areas. This should be secured via section 106 (s106) agreement or 278 as necessary. The public realm changes should include new Legible London wayfinding signage secured by S106, and updates to all other existing Legible London signage within walking distance of the site.

Active Travel Zone (ATZ) and Vision zero

- *TfL requested a day and night-time ATZ, though the applicant has provided an Active Travel Audit. TfL strongly recommends a 'night-time/dark hours' ATZ assessment is submitted to reflect the walking environment in the context of the Healthy Streets criteria 'People feel Safe'. TfL is commitment to improving women's safety and delivering the Mayor's Strategy to Reduce Violence Against Women and Girls. Given the workspace and leisure elements of the scheme, a night-time/ dark hours ATZ is justified through the shorter periods of daylight in winter months.*
- *Within the Active Travel Audit are 5 routes which align with the Healthy Streets Approach, the audit was taken between the hours of 14:30 – 16:30, TfL recommends the applicant carries out a morning Active Travel Audit as well to reflect the peak hours cycle commute.*
- *In line with the Mayors Vision Zero goal for deaths and serious injuries (KSIs) to be eliminated from London's transport and street networks by 2041, collision data was mapped against all the ATZ routes referred to above. In total for the ATZ, there were 47 recorded serious collisions and a single fatal, including 30 involving cycles. Given this figure, TfL may seek*

funding for highway safety improvements in line with London Plan policy T4 especially on cycleways.

- *From the assessments taken, the applicant has proposed recommendations for improvements to the local transport network, which would facilitate an environment that encourages walking and cycling. TfL would support the CoL in securing these improvements: provision of appropriate tactile paving at the informal crossing over the A4 New Fetter Lane/ Bartlett Court Junction, provision of dropped kerbs and tactile paving at the crossover on Shoe Lane beneath the A40 Holborn Viaduct.*

Car parking

- *Given the high PTAL, the car free scheme is strongly supported in accordance with London Plan policy T6 TfL also welcomes the removal of the existing porte cochère to therefore remove two existing vehicle crossovers, reinstating the footway and hence creating additional kerbside for the provision of two extra disabled car parking spaces. TfL accepts the current proposal for the location of the disabled car parking, given it is the main access to the primary use of the development, being the main offices entrance. In line with Policy T6 of the London Plan, TfL request the applicant ensures that all disabled parking spaces are Electric Vehicle Charging Points (EVCP) active spaces. In line with Policy T6, a Parking Design and Management Plan should be submitted alongside this application indicating how proposed blue badge car parking would be designed and managed, with reference to Transport for London guidance on parking management and parking design.*

Cycle parking

- *The applicant is committed to providing long and short stay cycle parking in accordance with the minimum London Plan standards which is welcomed. Clarification is sought however on how of long stay cycle parking spaces were calculated.*
- *The proposal states there will be 5% accessible parking spaces, meeting the London Cycling Design Standards (LCDS) requirement, the applicant therefore must provide at least 38 spaces for larger / adapted cycle spaces which must be accessible, meet the space requirements and involve step free access.*
- *The applicant should increase the proportion of Sheffield stands to 20% as they are more accessible and more convenient for all.*

- *The London Plan 2021 states space for folding bicycles should not exceed 10% of all spaces; this meets the proposed percentage and therefore TfL accept that 10% of long stay cycle parking spaces are folding cycle lockers.*
- *TfL welcomes the proposed number of short stay cycle parking, being 111 as a minimum, as well as the re-provision of the existing cycle hire parking on Wine Office Court. TfL welcomes the division between Sheffield stand and two tiered for the internal short stay cycle parking.*
- *TfL welcome further discussion for the remainder of the proposed short stay cycle parking.*

Design

- *The proposed cycle parking can be accessed level and at-grade via Shoe Lane, Wine Office Court, Gunpowder Square and Printer Street. TfL have concerns regarding access to the proposed location of basement 2 level. Access is from a wide staircase with cycle channels or 'suitably sized lifts. To accommodate all types of cycle, the applicant must confirm that the proposed lifts have the minimum dimensions of 1.2 by 2.3 metres, with a minimum door opening of 1000mm, and any door to a cycle parking area should be automated – push button or pressure pad operated to accommodate larger / adapted cycles.*
- *Requirements by the LCDS state that accessing the cycle parking should involve passing through no more than two sets of doors, with a recommended minimum external door width of 2 metres.*

Cycle Hire

- *Due to the significant uplift in development on the site, there will be an additional strain on cycle hire capacity in the surrounding area. This will drive additional pressure onto mitigating constantly empty docking stations and so increasing vans and drivers on the roads. TfL therefore requests a financial contribution and land for a new docking station to be provided.*
- *TfL are open to working with the City Corporation and the applicant to find a location within the vicinity. This should be addressed before the application is determined so that it can be secured in the section 106 agreement.*

Cycle Promotion Plan

- *The applicant has provided a Cycle Promotion Plan as part of the submission rather than a travel plan which is current practice for the City of London. However, the document*

appears to provide limited measures and targets to encourage cycling, and this does not appear to be focussed on visitors. This should be amended accordingly. S106 funding for monitoring the cycle plan should also be secured with robust cycle mode shift targets in line with the MTS.

Delivery and servicing

- An outline Delivery and Servicing Plan (DSP) is part of the submission. Delivery and servicing is proposed to take place off street from existing service yard from Shoe Lane which is welcomed in line with Policy T7 (Deliveries, servicing, and construction) part G. The service yard provides 2 large loading bays capable of accommodating vehicles up to and including a large refuse vehicle. The proposed development includes an at grade service yard in the south-east corner of the site with access retained in the same location but with an improved layout, The servicing yard is proposed to be improved and provide 2 loading bays accommodating for vehicles up to 7.5t box vans. TfL welcomes that the improved layout enables all vehicles to enter and egress the site in forward gear.
- Given the location there may be potential conflict with the main access routes for cyclists and therefore urges the CoL to ensure that all delivery and servicing activity to take place outside of peak hours of traffic (AM, PM and lunchtime peaks) in line with policy T7. The DSP should establish how the delivery and servicing activity would not increase road danger or lead to collisions between pedestrians, cyclists, and large vehicles.
- TfL notes that there is an increase in delivery and servicing vehicles, it is requested that the applicant demonstrates how the total expected vehicles will be accommodated in the loading bays.
- Given the high number of deliveries and servicing TfL recommends a delivery booking system to avoid queuing onto roads, as well as avoiding peak hours. The use of cargo bikes should be encouraged for deliveries in line with sustainability aims in the London Plan 2021
- The final DSP should be secured through planning condition.

Construction

- A temporary pitlane loading bay is being proposed for construction vehicle access provided on Little New Street adjacent to the site, prior to commencement of demolition and construction works, to have the capacity for two articulated

	<p><i>vehicles. The pitlane arrangement is proposed to require the suspension of the southern footway on Little New Street throughout the duration of construction. As Little New Street is not TLRN, the appropriate licensing must be obtained with CoL prior to commencement.</i></p> <ul style="list-style-type: none"> - <i>TfL welcomes the use of Banksman position at the site to aid directing of vehicles to and from the proposed loading locations, ensuring efficiency of vehicle manoeuvres avoiding conflict with road users and the safety of pedestrians. This includes the access route on Shoe Lane and Little New Street.</i> - <i>TfL recommends that construction hours avoid peak traffic hours and therefore suggest the proposed construction hours don't include the time between 8-9:00am and 17-18:00pm to reduce congestion on the surrounding networks.</i> - <i>TfL welcomes that vehicles will egress in forward gear from the loading bay pit lane, proceeding west along New Street Square and Bartlett Court, before proceeding northbound or southbound.</i> - <i>Given the location and scale TfL request the applicant ensures the site becomes at least FORS / CLOCS silver accreditation.</i> - <i>Regarding the staff travel plan, cycle parking allocated for construction workers should be accompanied with end of use facilities. See attached link for further guidance, https://content.tfl.gov.uk/lcds-chapter8-cycleparking.pdf</i> - <i>The CLP should be secured by condition.</i> <p>Officer response: Addressed in the 'Transport' and 'Planning obligations' sections of the report.</p>
<p>Transport for London Safeguarding Engineer</p>	<p>Confirmed no comments.</p> <p>Officer response: Addressed in the 'Transport' section of the report.</p>
<p>Twentieth Century Society</p>	<p>Provided detailed response which included:</p> <ul style="list-style-type: none"> - <i>The Society objects to the demolition of the existing building, which should be identified as a Non-Designated Heritage Asset... 1 Little New Street is a historic building of architectural merit and it contributes positively to the character and appearance of the area. It should be identified as a Non-Designated Heritage Asset (NDHA) – it clearly has “a degree</i>

	<p><i>of significance meriting consideration in planning decisions". Local planning authorities can identify NDHAs as part of the decision-making process on planning applications and we urge you to do so here...To summarise, the Society objects to the loss of 1 Little New Street and urges the local authority to identify the building as a Non-Designated Heritage Asset (NDHA) and to refuse the application on heritage grounds.</i></p> <p>Officer response: Addressed in the 'Design and Heritage' section of the report.</p>
Surveyor To the Fabric Of St Paul's	<p>A detailed response was received, including identifying harm to heritage assets.</p> <p>Officer response: Addressed in the 'Design and Heritage' section of the report.</p>

Letters of Representations

38. A total of 49 representations have been received including from residents nearby at Pemberton House, Dean Wace House and Wine Office Court properties comprising four objections and two neutral comments and Alderwoman Martha Grekos provided a neutral comment.
39. A total of 43 supporting the proposals, these all state: "I am writing to share my support for the Hill House proposals" with some responses also highlighting support for the rooftop restaurant, new public realm and library proposals.
40. Responses received can be summarised as follows:

<u>Representations</u>	
For residential buildings nearby including listed building (Wine Office Court) - requested window cleaning and façade cleaning during construction period including on bi-weekly basis, and deep clean of façade on completion of the ground works and of development, and repaint all woodwork and painted elements and metal railings	A condition is recommended to secure a condition survey for windows and facades.

<p>There should be no exception to the City of London quiet rules for limited construction at weekends.</p>	<p>The Environmental Health were consulted and recommended conditions including scheme of protective works prior to demolition and construction which includes details for noisy works hours. The criteria for variations to the standards noisy working hours are set out in the Code of Construction Practice. It may be required in instances related to public safety or engineering with a business case.</p>
<p>Privacy and overlooking, and the current floor levels of Hill House do not align with the floor levels of Pemberton House which means there are no existing direct sightlines</p>	<p>A condition is recommended to address overlooking and privacy issues to the nearby residential properties.</p>
<p>Impact to residential amenity</p>	<p>Environmental Health have been consulted and recommended conditions. This is addressed in 'Environmental Impacts' section of the report.</p>
<p>Noise and vibration including in early morning, late evening and weekends</p>	<p>Environmental Health have been consulted and recommended conditions. This is addressed in 'Environmental Impacts' section of the report.</p> <p>This would include securing a condition for a scheme of protective works to be approved by the Local Planning Authority.</p>
<p>Dust including on the exterior of Pemberton House, private spaces including patio</p>	<p>Environmental Health have been consulted and recommended conditions. This is addressed in 'Environmental Impacts' section of the report.</p> <p>This would include securing a condition for a scheme of protective works to be</p>

	approved by the Local Planning Authority.
Rubbish including screws, cable ties, etc left on the street and work persons sitting on the front steps of the building or Wine Office Court	Environmental Health have been consulted and recommended conditions. This is addressed in 'Environmental Impacts' section of the report. This would include securing a condition for a scheme of protective works to be approved by the Local Planning Authority.
Road closures and HGV traffic	Conditions are recommended for construction logistics details to be approved by the Local Planning Authority. The proposed condition has been amended to include restriction of HGV movement to and from the site to with in the hours of 9:30 to 16:30 Monday to Friday, 8 till 13:00 Saturdays and fully restrict movement on Sundays and Bank Holidays.
Loss of light, including with low existing levels and Applicant has not shared details or requested access to premises to assess.	This is addressed in the 'Daylight, Sunlight and Overshadowing' section of the report.
Right to light, and not been contacted by the Applicant regarding this who is ignoring legal obligations.	'Right to light' is not a material planning consideration and should be dealt with outside of the planning process. The impacts to residential amenity in respect to daylight and sunlight is addressed in the 'Daylight, Sunlight and Overshadowing' section of the report.

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

Policy Context

42. The Development Plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are

most relevant to the consideration of this case are set out in Appendix B to this report.

43. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which will be published for Regulation 19 consultation in the Spring of 2024. It is anticipated that the City Plan will be submitted to the Secretary of State in Summer 2024. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 48 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
44. 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.
45. 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)

46. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
47. 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.
48. For decision-taking this means:
 - a) approving development proposals that accord with an up-to-date development plan without delay; or
 - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
 - i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

49. 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).
50. Chapter 6 of the NPPF seeks to build a strong and competitive economy. Paragraph 85 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.
51. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.
52. 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.
53. Paragraph 97 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.
54. 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*”.
55. 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.
56. 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”.

57. 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.”*
58. 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.”*
59. 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.
60. 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...”*.
61. 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.

62. 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.
63. 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.
64. 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.
65. 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.
66. 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.
67. 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.”

68. Paragraph 205 of the NPPF advises *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*
69. Paragraph 206 states that *“any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*
- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
 - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”
70. 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”.*
71. 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

72. 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).

73. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

74. In exercising planning functions with respect to buildings or land in a conservation area, there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. (S72(1) Planning, Listed Buildings and Conservation Areas Act 1990).

Main Considerations

75. 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.

76. 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.

77. 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, including the proposed mainly office led use and associated retail uses and culture/community uses.
- c) The replacement of the public library (key City social infrastructure).
- d) The economic impact of the proposal.
- e) The impact of the development on the character and appearance of the area and the design of the building itself.
- f) The impact of the development on designated and non-designated heritage assets.
- g) The impact on strategic views in the London Views Management Framework and on other strategic local views.
- 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 on 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 proposed development on the amenity of nearby residential and other occupiers.
- p) The impact of the development on health and wellbeing.
- q) The impact of the development on fire safety.
- r) The impact on the development on flood risk.
- s) The requirement for the development to secure financial contributions and planning obligations.
- t) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010)
- u) The Human Rights Act 1998

Principle of Development – Economic impact of the proposal

- 78. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
- 79. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.
- 80. The City of London is a world leading international financial and professional services centre and has a nationally important role in the economy. The intense concentration of business occupiers in a small area is a key part of the attraction for companies looking to move into the City. The clustering of businesses is a vital part of the City's operation and contributes to its reputation as a dynamic place to do business as well as providing agglomeration benefits. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth.
- 81. To maintain this position, it is vital to ensure that sufficient office floorspace is available to meet projected employment growth and occupier demand and that additional office development is of high quality and suitable for a variety of occupiers. The Draft Local Plan 2040 sets out that the overall office floorspace

target of 1,200,000m² is derived from the estimated growth in office employment between 2021 and 2040 and represents a 13% increase in floorspace. Capacity modelling demonstrates that there are sufficient sites to meet this demand, provided primarily within the City Cluster area, supplemented by additional capacity elsewhere in the City.

82. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that many businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.
83. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.
84. London Plan Policy GG2 sets out the Mayor's good growth policy with regard to making the best use of land. These include prioritising sites which are well-connected by existing or planned public transport; proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling; applying a design-led approach to determine the optimum development capacity of sites; and understanding what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character.
85. London Plan Policy GG5 sets out the Mayor's good growth policy with regard to growing London's economy. To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, it is important that development, amongst others,

promotes the strength and potential of the wider city region; plans for sufficient employment and industrial space in the right locations to support economic development and regeneration; ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning; promote and support London's rich heritage and cultural assets, and its role as a 24-hour city; and makes the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.

86. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
87. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.
88. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.
89. Despite the short-term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. The recently prepared 'Future of Office Use' evidence base report for the City Plan 2040, highlights that the demand for best in class office space is higher than pre-pandemic. Local Plan and draft City Plan 2040 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations. These aims are reflected in the Corporation's 'Destination City' vision for the square mile.
90. In addition, the draft City Plan 2040 identifies the 'Fleet Valley' tall building area for the delivery of the required office accommodation.

Provision of Office Accommodation

91. Policy SD5 of the London Plan advises that offices and other CAZ strategic functions are to be given greater weight relative to new residential development within the City.
92. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.2 supports large office schemes in appropriate location. Policy DM 1.3 of the Local Plan seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses.
93. Draft Strategic Policy S4 (Office) sets out that the City Corporation will facilitate significant growth in office development of the highest quality to meet projected economic and employment growth by Increasing the City's office floorspace stock by a minimum of 1,200,000 m2 net during the period 2021 to 2040.
94. The proposed development would provide predominantly an office-led development. It is predicted to result in estimated 2,986 Full Time Equivalent (FTE) jobs. The proposed development would deliver an increase of in Grade A office floorspace on the Cluster, contributing to the achievement of the office floorspace target in both the adopted and emerging draft Local Plans.
95. The proposed development would result in an additional 38,941 sqm GEA of high quality, flexible Class E office floorspace and includes a smaller unit for affordable workspace suitable for SMEs. The office spaces are designed to support a range of tenants across a range of corporate sector companies, with flexibility to enable to extend across floors, to use part of individual floors through the creation of dividable and flexible space. Emerging City Plan Policy S4 encourages new floorspace to be designed to be flexible to allow adaptation of space for different types and sizes of occupiers.
96. A range of office floorspace is required to meet the future needs of the City's office occupiers, including provision for incubator, start-ups and co-working space. The S106 agreement would include an obligation to make specific and identified provision within the development for such occupiers. Policy S4 of the emerging City Plan encourages the provision of affordable office workspace that allows small and growing businesses the opportunity to take up space within the City. Policy E1 of the London Plan also highlights the need for

providing affordable workspace to new offices. This provision will be secured through the S106 agreement.

97. The proposed development would provide a primarily office lead development, providing a significant uplift in the number of full time jobs, as well as a significant uplift in the office floorspace. Therefore, the proposed development would support the strategic objectives of the development plan and the emerging City Plan. The economic benefits of the proposed development would be material and would weigh in favour of the proposed development.
98. For the reason stated above, it is considered that the scheme meets the aims of policies in the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015, S4 of the emerging City Plan 2040 and E1 of the London Plan in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and employment in line with the aspirations for the CAZ and the requirements of the Local Plan and the emerging City Plan. The proposed development would result in a significant amount of additional, high quality, flexible Class E office floorspace for the City, contributing to its attractiveness as a world leading international financial and professional services centre.

Proposed retail and other commercial uses

99. Policy DM 1.5 encourages mixed commercial uses within office development which contribute to the City's economy and character and provide support services for its businesses, workers and residents. Similar support of other commercial uses particularly at ground and basement levels is also supported by policy OF1 of the emerging City Plan.
100. The proposed development supports a range of Class 'E' uses with café/retail use at ground and a restaurant at level 17, and a flexible gym / auditorium use at basement level.
101. Although the site does not fall within a primary shopping area, it is already occupied by a bar use at ground and lower ground floors.
102. Active retail frontage would be retained across the ground floor across the Site. 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.

Provision of flexible library (Use Class F1) and affordable workspace (Use Class E)

Relevant policy

103. The NPPF states development should provide the social, recreational and cultural facilities and services the community needs.
104. The London Plan Good Growth objective GG1 is considered applicable to the provision of community use within development proposals.
105. The Site falls within the CAZ and London Plan Policy SD4 outlines that within this area the unique concentration and diversity of cultural and arts functions should be promoted and enhanced.
106. Policy HC5 of the London Plan recognises that the continued growth and evolution of London's diverse cultural facilities and creative industries should be supported, and cultural facilities includes libraries.
107. London Plan Policy S1 supports proposals for social infrastructure and defines this as services and facilities that meet local and strategic needs and contribute towards a good quality of life including education and community uses.
108. Policy CS11 of the London Plan seeks 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 and should be providing, supporting, encouraging access to and further developing a wide range of creative and cultural spaces and facilities across the City. Draft Plan Policy CV2 states that all major developments should be supported by a Cultural Plan outlining how the development will contribute to the enrichment and enhancement of the City's cultural offer.
109. Local Plan Policy CS22 protects existing social infrastructure in the City stating there should be no overall loss of community facilities in the City where a need exists.
110. Local Plan Policy DM22.1 states loss of social and community facilities should be resisted unless replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility and states 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.

111. Emerging Strategic Policy S1 of the draft City Plan 2040 supports facilities for the provision and improvement of social and educational services through the City's libraries. Similar requirements are set in Draft City Plan 2040 policy HL5.

112. Supporting text for Policy S6 of draft City Plan outlines that the City of London will support and encourage access to and development of a wide range of creative and cultural spaces and facilities across the City. Supporting text 8.1.0 states '*...that the City of London contains a huge concentration of arts, leisure, recreation and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function*' and that these include creative workspaces and libraries.'

113. Emerging Policy CV2 of the Draft City Plan 2040 encourages the provision of facilities that meet the need of visitors including libraries.

114. London Plan Policy E1 states that development proposals related to new or existing offices should take into account the need for a range of suitable workspace including lower cost and affordable workspace. Policy E3 of the Plan states planning obligations may be used to secure affordable workspace at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose.

Existing and proposed library

115. There is an existing City of London Corporation Library (Shoe Lane Library) at the Site at basement level comprising 1,016 sqm (GEA) with the entrance at the northeast corner.

116. Shoe Lane Library is one of the City's three lending libraries. There are few local residents and most of the library's customers are City workers and families. Prior to the pandemic, it was one of the busiest and best-used libraries of its size in London and the second busiest public library in the City.

117. Shoe Lane is the home of the Dragon Café in the City, a highly successful partnership with the charity Mental Fight Club which provides a programme of regular digital and physical activities to support and promote good mental health. It also has its own very popular events programme, working in collaboration with partners such as Kings College and Westminster Abbey,

and a thriving offer for children under five and their families, as part of the Children's Centre Services for the City of London.

118. The libraries team have identified the need for additional rooms that can be hired out to generate income.
119. The Applicant proposes providing a library use (1,040 sqm GEA), and additional floorspace at upper ground mezzanine level for flexible library and affordable office floorspace (638 sqm GEA).
120. The Applicant has agreed the principle of providing a temporary library at basement level at One New Change for up to five years whilst the Development at Hill House is underway; a planning application for change of use at One New Change is to be submitted imminently and would be secured through obligation.
121. The principle of relocation and redevelopment for the library has been considered at City of London Committees including at the Culture, Heritage and Libraries (CHL) for decisions on 13 December 2021 and 14 November 2022, and Community & Children's Services (CCS) for information on 23 January 2023.
122. In the CHL meetings, members gave approval to enter into non-binding negotiations with the Development and agreed to the temporary relocation of the library and delegated authority to the Town Clerk, in consultation with the Chair and Deputy Chair, to approve future decisions on the detail of the agreed terms with the Applicant if they need to be made in advance of the next Committee meeting. The Libraries team has provided an update to the Chair and Deputy Chair on the discussions to date for the Section 106, as set out in this report.
123. If this application is approved, a further update is expected to be provided at a later CHL Committee and CCS Committee in advance of signing a Section 106 Agreement. The heads of terms for the relocation of the library are therefore subject to members decisions at these committees.
124. The proposed library would be based at ground and mezzanine level through a dedicated entrance leading from Gunpowder Square at the southwest corner of the site. The existing library entrance is considered less visible with limited active frontage with the facilities at basement level with a small frontage at ground floor level. Therefore the proposal is considered an enhancement to the existing library due to significant active frontage and facilities accessible at ground floor level, which would be linked to new landscaped high quality public realm significantly enhancing the library entrance.

125. The proposal would also provide meeting rooms in the main library demise which could be used to generate income, which will be secured through planning obligation. In addition, the Applicant is providing the opportunity for additional space to be used as library and affordable workspace (outside the core library demise) with a further opportunity to generate income for the Libraries Team. This would be secured through planning obligation.
126. A Library Management Plan has been provided which includes indicative layouts and proposed uses, and Section 106 obligations would require future detail for this.
127. The Section 106 obligation would be required to secure the provision of a library for the City of London Corporation. The details to be agreed through a Section 106 obligation to secure this use are set out in the 'City Planning Obligations' section of the report.

Fallback Financial Security

128. In order to safeguard the library re-provision, the Corporation is requiring financial security in the form of a payment or guarantee which will ensure that the Corporation can deliver a library in the West of the City in the event that Landsec fails to deliver in accordance with the agreed timetable. This is to be secured at part of the Section 106.

Relocation of Library

129. The Applicant will obtain all necessary consents for the temporary relocation to One New Change and if it is unsuccessful it will provide details of alternative sites and obtain consents for the alternative site, to be secured by obligation. The library will remain in the temporary location until the permanent space at Hill House has been completed however if Hill House has not been completed by a long stop date the Corporation will be able to drawdown on the security provided by the Applicant to find an alternative permanent site for the library.
130. The relocation costs of the move to the temporary library, and the return to the permanent library, are to be covered by the Applicant.
131. The submission of the following would be required by the Applicant prior to any significant works commencing on site:
- Decanting Strategy;
 - Temporary Library Management Plan, Inventory and Specification, to include details of contents, design and layout;

- Permanent Library Management Plan, Inventory and Specification, to include details of contents, design and layout;
- Confirmation that the Temporary Library Lease and the Permanent Library Agreement for Lease have been entered into.

New Library facilities

132. The Agreement will secure that the Applicant cannot occupy the development until the library has been fitted out and is available for occupation by the library.
133. The Applicant will meet the costs and carry out works for the fit out and furnishing of the new library in accordance with the Permanent Library Inventory and Specification (to be agreed).
134. The current lease expires in March 2035. Draft Heads of Terms for the new library space have been submitted to the City Surveyors by the Applicant and are currently being considered. These terms are reflected within the Section 106 negotiations. These terms include peppercorn rent for the lease term of 65 years with a reasonable cap on service charge with commercially improved terms to the existing lease to be agreed
135. A rolling Landlord development break option from 25 years has been requested by the Applicant, which would only be exercised in the event of redevelopment of the site which would require planning permission. The Section 106 agreement and lease Heads of Terms will require the reprovision of the library in an alternative location at that time, at no cost to the Corporation should the break be exercised. The Corporation, as planning authority, can also secure the reprovision of the library at that time in a new S106 agreement tied to any new planning permission.
136. If approved, the draft heads of terms for both the temporary and permanent lease would be appended to the Section 106 Agreement.
137. The Applicant has agreed to provide a Changing Places toilet and a lift within the library demise. The cost of maintenance of Changing Places Toilet and of a platform lift from ground to mezzanine in the main library demise is to be maintained by the Applicant for the life of the Development, to be secured by obligation.

Affordable workspace and hireable rooms in main library demise

138. The Applicant has confirmed that the workspace at mezzanine level will be for flexible use of the library and affordable workspace, therefore would be utilised for a mixture of both. The Section 106 will secure this for affordable workspace

and the library will have the opportunity to operate this and generate profit. If not operated by the library the affordable workspace will be operated by the Applicant, and remain as affordable workspace.

139. For the affordable workspace, a reasonable cap on service charge is to be agreed and the Applicant has confirmed that additional service charge would not be payable for the first three years or before the affordable workspace becomes profitable, if this is being operated by the Libraries team.
140. The Section 106 will secure the use of meeting rooms in the main library demise and the affordable workspace for the use and profit of the library.
141. An Affordable Workspace Management Plan will be secured by obligation.

Public rooftop terrace access

142. Regular access for community uses has been agreed in principle with the Applicant to the floorspace and terrace located at the top of the building on the 18th level.
143. This is to be secured by Section 106 obligation and would include weekly access on Friday mornings, fortnightly access for the Dragon Café or other similar health and wellbeing or library uses, exclusive access for four weekends (Friday-Sunday) a year for library events and the option to apply for weekend exclusive use for an additional 22 weekends of the year for library or community related activities and an obligation will secure this access.

Cultural Strategy

144. The applicant has submitted a Cultural Strategy with the application which sets out the key elements of the proposal include:
 - Creating an easily accessible library space with expanded services to cater to various needs.
 - Exclusive quarterly access (Friday-Sunday) to the Level 18 rooftop office amenity level for programmed library and cultural events.
 - Exclusive weekend access (Saturday-Sunday) to the Level 18 rooftop office amenity level for up to 22 weekends per year for cultural events programmes in the City.
 - Fortnightly Level 18 rooftop office level amenity access for the Dragon Cafe events and meetings.
 - Designing a flexible workspace within the library to serve both the community and SMEs/freelancers.
 - Establishing an Apprentice Hub for learning and community-building.

- Introducing artistic interventions to celebrate the local heritage of the Fleet Street area

145. Subject to a Cultural Management Strategy to be secured via S106, it is considered that the policies referred to above would be complied with.

Sustainability Considerations

Circular Economy

146. London Plan Policy S17 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2 set out the City's support for circular economy principles.

147. The application includes considerations as to whether there is an opportunity to retain and refurbish the building or building elements currently on site.

148. The existing Hill House was completed in 1979. The building comprises seven storeys above ground level including a plant floor, and it has two basement levels. It is of brutalist design, clad in pre-cast concrete panels, and it has strongly articulated features, such as the stair and lift towers facing east and west that are prominent due to the progressively set back levels 04 to 07. The base of the building is set back from the dominant facade line, with columns expressed around the perimeter. Typical office floorplate structural slab to structural slab level heights are 3.97 m with a 0.4m slab zone.

149. The foundations are designed to be suitable for a much taller building. It was discovered in records that the initial design of the site was to accommodate a tower construction with a deep basement; however, this plan was scrapped in 1964. Instead, the current building was developed on the foundations for the tower and diaphragm walls including partially excavated basement before the project was halted and redesigned.

150. A pre-redevelopment audit, a pre-demolition audit and a materials audit have been undertaken. As part of the pre-redevelopment audit, 6 options were considered:

Option A: minor refurbishment with partial ground floor extension, 100% of substructure and 90% of superstructure retained

Option B1: minor refurbishment with partial ground floor extension and minor extension to upper levels, 100% of substructure and 90% of superstructure retained

- Option B2: major refurbishment of retained substructure and 4-storey superstructure and 7-storey extension, 99% of substructure and 46% of superstructure retained
- Option B3: major refurbishment of retained substructure and 4-storey superstructure with a 14-storey extension, new core, 93% of substructure and 32% of superstructure retained
- Option C: redevelopment above ground with 18 storeys with retention of 91% of substructure and 0% of superstructure
- Option D: full redevelopment

151. Subsequently, the following options were discounted:

- Option A: The existing building would not meet the required modern office quality and the spatial vision for the site as set out elsewhere in this report.
- Option B2: This option was optimised to form option B2+ with an adapted core to enable a larger extension to achieve a 15-storey building
- Option B3: This option was optimised to form option B3+ with a more generously adapted ground floor to improve the library and interface with the public realm
- Option D: The replacement of the basement and foundations would increase the carbon footprint by 29.27% compared to option C, and as the retention of those elements are considered feasible, option D was discounted.

152. The remaining 4 options B1, B2+, B3+ and C were considered in more detail.

153. Option B1 retains the majority of the building and includes refurbishment and the extension of levels 4 and 5. This option would not result in much demolition, however, it would not address the main shortcomings of the building, in particular its lack of ground floor – public realm relationship and of occupier amenity and greening, and therefore would only be a short term solution before major works would become necessary.

154. Option B2+ removes the top 4 floors to be replaced with 7 storeys to create a 11-storey building with larger floorplates – the size is determined by the retention of the core in order to minimise structural intervention that limits the number of additional lifts and the potentials to improve the arrangement of core, lift lobbies and the quality of office floorspaces.

155. Option B3+ retains the same extent of substructure and superstructure with the exception of incorporating a larger core on the retained upper floors and basements to allow for greater height. This would unlock a number of constraints relating to the ground floor and upper floor plates, however the

lower 3 retained office floor levels would not be of the same high quality as the new built floors.

156. Option C is the redevelopment of the building from ground floor upwards, to create highest quality office floorspace and relationship with the public realm. This option would still retain 91% of the substructure and avoid increased complexity in demolition and temporary works to retain parts of the 4 upper floors that would result in a longer construction programme. Option C therefore has been developed for the application scheme.
157. Overall, the analysis of the options with regard to circular economy demonstrates that the retention of higher percentages of existing superstructure would not provide an attractive ground floor and public realm relationship or highest quality office floorspace as has been developed in the local area in recent years. However, the materials have been catalogued and assessed for further reuse opportunities in form of an upcycling catalogue and a façade panel reuse study, to ensure that deconstruction material resulting from the preferred option C can be reused at highest values. This forms a substantial basis for improving the material reuse opportunities at later project stages, and the confirmation of details will be required through a condition.
158. The submitted Circular Economy Statement for the planning application scheme describes the strategic approach to incorporating circularity principles and actions into the proposed new development, in accordance with the GLA Circular Economy Guidance.
159. The circular economy strategy includes details to support reuse and recycling of existing materials within the new built elements identified in the pre-demolition audit, as well as identifies an efficient materials strategy for all new elements, to include:
 - Reuse of 90% of the substructure, and 57% of retained materials of the existing building, with strengthening and reconfiguration works that aim to use a high recycled content
 - Identification of reuse opportunities of the deconstruction materials
 - Structural standardisation to minimise wastage rates and optimised structure (e.g through post-tensioned slabs)
 - Design of the façade system with reverse mullions that provide external solar shading without additional external building elements, and maximum use of recycled aluminium
 - Modular nature of core plant installations for easy repair, maintenance and disassembly
 - Flexibility and adaptability of internal layout and fit-out
 - Consideration to prepare material passports for the new building.

160. Confirmation of the proposed measures and identified opportunities through an update to the Circular Economy Statement and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm that high aspirations can be achieved are required by condition.

Operational energy strategy and carbon emissions

161. The Energy Statement accompanying the planning application demonstrates that the proposed development has been designed to achieve an overall 13% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building.

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

- High levels of envelope insulation to reduce energy demand
- Airtight construction to prevent heat loss
- Optimised façade design to mitigate overheating risk and reduce cooling demand whilst maximising daylight to reduce the use of artificial lighting
- Highly efficient facade with automated blinds to prevent excessive solar gains
- External solar shading with solar control glass to help reduce unwanted solar gains

163. The following energy-efficient plant is proposed:

- High-efficiency mechanical ventilation systems with heat recovery
- Low energy lighting throughout with daylight and occupant detection
- System controls and diagnostics systems to operate the building effectively
- Metering and sub-metering to monitor energy use and by dwelling, enabling energy use and occupant behavioural learnings and subsequent adjustments to improve building energy demand post occupancy.

164. The strategy would reduce the new building's operational carbon performance by 6% beyond Part L 2021.

165. There is currently no available district heating network close enough to the site, and the opportunity to connect into a future district heating network would be incorporated into the basement of the proposed development.

166. In relation to low and renewable energy technologies, a system of air source heat pumps and water source heat pumps, and rooftop mounted PV array of 52 sqm would provide low carbon and renewable energy, reducing the

operational carbon emissions by 7% compared to a Building Regulations 2021 compliant building.

Energy Use Intensity (EUI)

167. The adopted GLA energy assessment guidance (2022) requires developments to calculate the EUI, a measure of total energy consumed in a building annually including both regulated and unregulated energy, as well as the space heating demand. For offices, the GLA targets an ambitious EUI of 55 kWh/m²(GIA)/year and a space heating demand of 15 kWh/m²(GIA)/year. The estimated EUI from the proposed development is 75.8 kWh/m²/year and for the space heating demand 5.0 kWh/m²/year. These values present equipment consumptions from both the landlord and tenant perspective. They are based on speculative allowances that will be reviewed in more detail to provide more accurate estimations in the next stages.
168. The site-wide energy strategy does not meet the London Plan target of 35% carbon emission savings compared to a Part L 2021 compliant scheme. However, the calculated 13% reduction is broadly in line with other City office developments approved since the adoption of Part L 2021 that now includes low carbon heating for non-residential developments in the baseline, but not for residential developments.
169. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

BREEAM

170. Four BREEAM New Construction 2018 pre-assessments have been undertaken, one each for the offices, library, retail and gym uses targeting "outstanding" ratings for each:
- Offices (shell and core): 90.8%
 - Library (fully fitted): 91.4%
 - Retail (shell and core): 88.5%
 - Gym (shell and core): 88.1%.
171. The pre-assessments are on track to achieve a high number of credits in the City of London's priority categories of Energy, Water, Pollution and Materials, as well as the climate resilience credit in the Waste category.

172. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2040 Policy DE1. Post construction BREEAM assessments are required by condition.

NABERS UK

173. This certification scheme rates the energy efficiency of a commercial building from 1 to 6 stars over a period of 12 months of operation. The applicants are signing up to this scheme, targeting a 5 star rating (out of 6 stars possible) which will contribute to reducing common performance gaps between modelled and actual energy use intensity.

Whole life-cycle carbon emissions

174. London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility, and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.

Carbon options

175. The following options were chosen as described in the Circular Economy section to be fully assessed and evaluated:

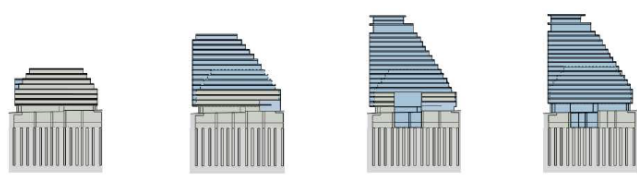
Option B1: minor refurbishment with partial ground floor extension and minor extension to upper levels, 100% of substructure and 90% of superstructure retained

Option B2+: major refurbishment of retained substructure and 4-storey superstructure with an adapted core to enable a larger extension to achieve a 15-storey building, 99% of substructure and 46% of superstructure retained

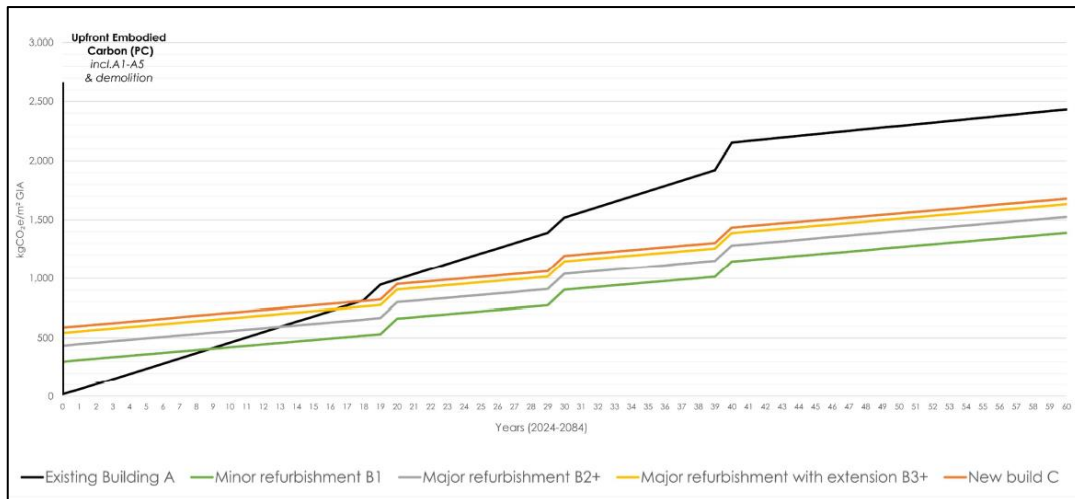
Option B3+: major refurbishment of retained substructure and 4-storey superstructure with a 14-storey extension facilitated by new core, with a more generously adapted ground floor to improve the library and interface with the public realm, 93% of substructure and 32% of superstructure retained

Option C: redevelopment above ground with 18 storeys with retention of 91% of substructure and 0% of superstructure

176. The following table and graph present the whole life-cycle carbon results from the 4 options.



Option Reference	B1	B2+	B3+	C
Project Reference Period	60	60	60	60
Gross Internal Area (GIA) m ²	25,264	43,879	50,647	50,834
Net Internal Area (NIA) m ²	12,958	25,762	27,283	28,207
Change to NIA compared to existing m ²	1,185	13,989	15,510	16,434
Substructure % retained by mass	100	99	93	91
Superstructure % retained by mass	90	46	32	0
Total WLCA (inc. B6 & pre-demo) (kgCO ₂ e/m ² GIA; B7 not included)	1,389.4	1,525.4	1,632.4	1,678.4
Upfront Embodied Carbon (A1-A5) (kgCO ₂ e/m ² GIA)	297	425	527	563
In Use Embodied Carbon (B-C) (kgCO ₂ e/m ² GIA)	356	356	356	356
Operational Carbon for building lifetime (B6) (kgCO ₂ e/m ² GIA)	734.4	734.4	734.4	734.4
Total WLCA (inc. B6 & pre-demo) (tCO ₂ e, B7 not included)	35,102	66,933	82,676	85,320
Total Existing Building Demolition (tCO ₂ e)	51	439	760	1,271
Upfront Embodied Carbon (A1-A5) (tCO ₂ e)	7,503	18,649	26,691	28,620
In Use Embodied Carbon (B-C) (tCO ₂ e)	8,994	15,621	18,030	18,097
Operational Carbon for building lifetime (B6) (tCO ₂ e)	18,554	32,225	37,195	37,332



177. The options clearly show that, based on new building services installations, all 4 options' carbon emissions rise at a very similar rate throughout a 60 year life-cycle, and that the upfront and whole life-cycle carbon impact is higher with more new build quantity. The existing building's performance (option A) over the reference period shows a much steeper graph, due to the lack of efficiency of the existing façades and MEP. These will have to be fully replaced after around 40 years at the latest, after which the operational performance would run parallel with the other options. Qualitatively, the options can be assessed as follows:

178. Options B1 and B2+ would not be able to achieve the improvements to the ground floor and its relationship with the public realm around it to activate the area and relationship with the reconfigured public library. Option B1, and option B2+ in the retained parts would not be able to provide the high quality office floorspace that is sought after in this part of the City. In option B2+, only the new floors can achieve the highest office floorspace quality in terms of spaciousness, daylight, orientation and flexibility.

179. Option B3+ and option C are similar in size and option B3+ would facilitate a new, larger core for a greater floorspace uplift of higher quality compared to the floorspaces on the retained floors. The resulting whole life-cycle carbon emissions for both options, and both by square meter and absolute, would be at a similar level (slightly higher for option C). While options B1 and B2+ would result in significant carbon savings, they are not considered high quality solutions that would attract occupiers in this location. Given the higher quality improvements to the public realm, the ground and upper floors through better configuration of the floorplates compared to option B3+, option C has been further developed for the application scheme.

180. The optioneering approach set out in this section and in the Circular Economy section is in line with the recommended approach in the GLA's guidance on

circular economy and whole life-cycle carbon emissions. The optioneering assessment complies with the more detailed methodology set out in the City of London's Carbon Options Guidance (2023) to establish and evaluate the carbon impact of development options as confirmed by a 3rd party review.

181. The application proposal: The submitted whole life-cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table below. The results show that the embodied carbon emissions can be reduced beyond the GLA's Standard Benchmark, reaching close to the Aspirational Benchmark.
182. The following principal carbon reduction measures have been incorporated into the proposal, targeting the 3 materials steel, concrete and aluminium that contribute most (55.63% of total embodied carbon) to the proposed scheme:
 - Reuse 90% of the existing substructure, or 57% of the existing structure overall
 - Reuse of the existing external wall panelling as an internal finish
 - Reuse of the ceramic floor tiles
 - Reuse of the existing raised access floors
 - Use of re-purposed steel from off-site facilities within the new structure
 - Design for exposed ceilings to reduce the installation of fit-out items that are subject to frequent change
 - Maximisation of standardised materials and elements to ease disassembly, fitting and replacement.
183. Further opportunities will be considered such as cement replacements, low embodied carbon rebar and tendons and high recycled content aluminium profiles.
184. The applicants have specifically considered the carbon impact of the façade system which is a large contributor to embodied carbon for large commercial buildings – typically one-fifth of the total embodied carbon. In addition, façade systems require more frequent replacements compared to structural building elements. In a typical aluminium/glass curtain wall façade system, aluminium contributes 66.5% of the façade panel, however, as the applicants prefer aluminium due to its ability of 100% reclamation for other products and systems, disassembly potential and greater elemental resilience, the proposed façade design has been optimised with a reversed mullion system to provide solar shading as part of the structural elements of the system. Potential other materials, such as steel, copper or zinc, or a high (75%) recycled aluminium

content, and associated carbon impacts, will also be considered in the detailed design phase.

185. The table below shows whole life-cycle carbon emissions per square meter in relation to the GLA benchmarks (embodied carbon without carbonisation applied) at planning application stage:

Scope	Proposed Redevelopment	Benchmark	GLA Benchmark
RICS components	kgCO2/m2	kgCO2/m2	
A1-A5	645	< 950	GLA Standard
		< 600	GLA Aspirational
A-C (excluding B6-B7)	995	< 1400	GLA Standard
		< 970	GLA Aspirational
B6+B7	617		
A-C (including B6)	1,612		

186. These figures would result in overall whole life-cycle carbon emissions of 92,019,274 kgCO2 being emitted over a 60-year period. Of this figure, the operational carbon emissions would account for 35,216,593 kgCO2 (38% of the building's whole life-cycle), and the embodied carbon emissions for 56,802,681 kgCO2, (62% of the building's whole life-cycle carbon). The embodied carbon from the substructure contributes 8.5% to the total embodied carbon which accounts for the proposed reuse of substructure of more than 90%; while the superstructure accounts for 47.8% of the total embodied carbon which is the highest proportion of embodied carbon in the new building. Building services would contribute to 29.8% of total embodied carbon emissions.

187. A higher recycled content of steel, aluminium and cement replacements in concrete will be targeted in the detailed design and procurement stages which would further reduce the upfront carbon emissions.

188. The whole life-cycle carbon approach of the proposed development addresses the NPPF 2023 requirement stated in paragraph 157 that the planning system should support the transition to a low carbon future and that it should help to, amongst others, encourage the reuse of existing resources, including the conversion of existing buildings. This is reflected in the carbon pioneering that has been carried out as described above, in the whole life-cycle carbon

emission calculations that have been confirmed by an independent 3rd party review to be in line with the GLA Whole Life-cycle carbon assessment guidance and in the details of the application scheme to include retained substructure as well as a catalogue of reuse opportunities and low carbon measures.

189. A detailed whole life-cycle carbon assessment confirming improvements that can be achieved through the detailed design stage, in particular those that have been identified in the application documents, and a confirmation of the post-construction results are required by conditions.

Urban Greening

190. London Plan Policy G5 (Urban Greening) sets out the requirement for major developments to contribute to the greening of London through urban greening as part of the design and site. An Urban Greening Factor of 0.3 is recommended for non-residential developments. Draft City Plan 2040 policy OS2 (City Greening) mirrors these requirements and requires the highest levels of greening in line with good design and site context. The proposed development would incorporate significant public realm areas and landscaping at street level and higher up the building in the form of new terraced areas. The glasshouse office reception and lobby space will also be extensively greened, albeit as internal space this does not contribute to the Urban Greening Factor (UGF) score achieved for the application site.
191. The landscape proposals seek to create a robust green infrastructure embedded within the architecture. There are terraces on all levels from level 1 providing large green spaces accessible to the occupants. The planting plan includes a combination of wildflower/sedum, herbaceous planting, shrubs and trees of various sizes. On the roof above level 18 there would be a biodiverse green roof to contribute to reducing surface water run-off and by improving building insulation, urban greening and biodiversity.
192. The proposed development would achieve a minimum Urban Greening Factor (UGF) of 0.30, compliant with the London Plan requirement.

Biodiversity Net Gain

193. The Ecological Appraisal of the proposals recommends the following enhancement measures to improve the ecology of the site:
 - Invertebrate habitat features within areas of ground level landscaping and within dense areas of planting on terraces

- Bat boxes integrated into the fabric of the building or on mature trees as per the Applicant's Biodiversity Brief
- Incorporation of bird nest boxes integrated into the fabric of the building, targeting black redstart, swift and house sparrow in addition to generalist boxes onto mature trees
- Biodiverse intensive green roofs with varied substrate and invertebrate habitat features such as deadwood log piles, rope coils, sandy piles and water trays
- Use of invertebrate-friendly plant species.

194. The proposed development would achieve a Biodiversity Net Gain (BNG) of 517.33%.

Overheating

195. To address urban heat island risks, the proposed development would incorporate an optimised façade design with external shading through projecting fins and solar control glass, minimising overheating risk and reliance on active cooling. Openable windows will be provided to further reduce reliance on mechanical ventilation. Urban greening and blue roofs on the terraces would reduce heat absorption within the building.

196. A thermal comfort assessment has been submitted and impacts are considered acceptable, subject to mitigation measures.

Flooding

197. The application site is located in Flood Zone 1 and therefore has a low likelihood (less than 0.1% annual probability) to be affected by flooding from tidal, fluvial, pluvial, groundwater and artificial sources. The proposed development will reduce run-off rates by using surface water attenuation tanks and blue/green roofs in high rainfall events.

Water Stress

198. The proposed development will incorporate water efficient fittings targeting a 55% water demand reduction against non-domestic baselines. Other proposed measures to reduce potable water use are rainwater recycling and greywater harvesting systems, details of which are requested by condition.

Conclusion on Sustainability

199. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing. The Local Plan policies require redevelopment to demonstrate highest feasible and viable sustainability standards in the design, construction, operation and end of life phases of development as well as minimising waste, incorporating climate change adaption measures, urban greening and promoting biodiversity and minimising waste. The proposed development is compliant with Local Plan Policy DM 15.5.
200. The proposed development would deliver a high quality, energy efficient development that is on track to achieve “outstanding” BREEAM assessment ratings for all uses, in compliance with London Plan policy SI 2, Local Plan policy CS15 as well as Draft City Plan 2040 policy DE1. The proposals cannot meet the London Plan target of 35% operational carbon emission savings compared to a Part L 2021 compliant scheme which the GLA acknowledges will initially be difficult to achieve for commercial schemes. However, the proposed energy efficiency and MEP strategy would perform highly, with an innovative façade system that would provide both operational and embodied carbon efficiency and an additional opportunity to use timber for internal elements.
201. The assessment of options, carried out in compliance with the Carbon Options Guidance 2023, confirmed that although the preferred proposal would result in the highest whole life-cycle carbon emissions out of the 4 options, none of the other options would be able to deliver the holistic sustainability benefits that would complement the ongoing repositioning of the Holborn and Fleet Valley area into a vibrant, healthy and sustainable new part of the City. The planning stage whole life-cycle carbon emissions reach close to the GLA’s Aspirational Benchmark, and opportunities to maximise the reuse of deconstruction materials from the site and from other reuse sources have been identified to mitigate impacts of redevelopment. The proposal therefore would satisfy the GLA’s circular economy principles and London Plan policy SI 7, Local Plan policy CS15 and DM17.2, and Draft City Plan 2040 policy CE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and various opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13,

Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and Draft City Plan 2040 polices S14, OS1, OS2, OS3, S15, CR1, CR3.

Design and Heritage

Environmental Impact Assessment (EIA)

202. The Townscape, Heritage and Visual Impact Assessment (THVIA) was submitted with the application as part of the EIA. The visual and heritage impacts are considered further in this report section.
203. However in addition to the analysis below, the EIA considers the construction phase, including visual impacts for demolition of the existing structures on the Site, the erection of tower cranes, the presence of scaffolding and heavy plant, and the construction of the new building. It states that each of these will have an effect on the Site's townscape character, visual intrusion and the appreciation of heritage assets. However, it is considered that their presence will be an inevitable consequence of the nature and scale of the proposed development and adverse effects will be temporary and short term.
204. The EIA assessment also considered each of the heritage receptors and townscape character and concluded that whilst there may be cumulative schemes in the surrounding area, these will not affect heritage receptors or the assessment of the proposed development. For Visual Amenity, the assessment states that Cumulative Schemes will only be visible in seven of the 29 assessed views and in all of these views the magnitude of impact will remain the same as the proposed development assessed in isolation. It states that there are no increased visual effects as a result of the Cumulative Schemes, and they will not give rise to significant effects in respect of visual impact.

Design Approach: Architecture, Urban Design and Public Realm

Policy context:

205. The relevant local policies for consideration are CS10, DM10.1, DM, DM10.3, DM10.4, DM10.5, DM10.6, DM10.8, CS16, DM16.2, CS19, DM19.1, DM19.2 of the Local Plan policies and HL1, S8, DE2, DE3, DE5, DE8, S10, AT1, S12 of the emerging City Plan, and London Plan policies D3, D4, D5, D8 and D9.

Principle of a Tall Building:

206. The proposal is for a building of 94.80m. This would be defined as a tall building under the provisions of the adopted Local Plan Policy CS13 and emerging City Plan 2040 Policy S12.
207. The City's long-term, plan-led approach to tall buildings is to cluster them to minimise heritage impacts and maximise good growth. As such, the adopted Local Plan seeks to consolidate tall buildings into a singular, coherent City Cluster (Local Plan policies CS7 and CS14 (1)), an approach carried forward in the emerging City Plan 2040 with the addition of a smaller proposed Cluster in the Holborn and Fleet Valley area (Policies S12 and S21).
208. The application site falls outside the 'Eastern Cluster/City Cluster' policy areas in the adopted Local Plan and emerging City Plan Policy CS7, but does fall within the proposed Holborn and Fleet Valley Cluster in the emerging City Plan Policy S12.
209. London Plan policy D9 (B (3)) stipulates that tall buildings should only be developed in locations that are identified as suitable in Development Plans. While seeking in an overarching sense to cluster tall buildings within the Eastern Cluster, the City's adopted Local Plan 2015 defines those areas in which tall building proposals would be inappropriate in principle and should therefore be refused under Policy CS14. These areas include conservation areas, St Paul's Heights, St Paul's protected vista viewing corridors and Monument views and setting.
210. The application site is not within an area identified as inappropriate in principle for a tall building under the 2015 Local Plan. On this basis, the proposal would be compliant with the aims of CS14 (2), and would engage CS14 (3), under which tall buildings would be permitted elsewhere in the City only on those sites which are considered suitable in relation to townscape, skyline and heritage impacts. The potential for these are assessed in detail below.
211. Emerging City Plan 2040 specifies, in accordance with London Plan Policy D9, areas where tall buildings would be appropriate in principle which includes the new proposed Cluster at Holborn and Fleet Valley. The application site falls within the proposed Cluster and as such would be considered appropriate for a tall building in principle in respect of the 2040 Plan.
212. At 94.80m AOD, the proposal would exceed the highest of the contours of the proposed Cluster (90m AOD) by 4.8m and there would therefore be a degree of conflict with emerging policy S12 regarding height of the 2040 Plan. The emerging 2040 City Plan has not yet gone through Regulation 19 consultation

and as set out is considered to be a material consideration afforded limited weight.

213. The application site is within the Central Activities Zone (CAZ), a highly accessible and sustainable location with the highest PTAL rating of 6B and excellent access to transport infrastructure. The proposal would complement the unique, pan-London role of the CAZ, as an agglomeration and rich mix of strategic functions, including nationally and internationally significant office functions, cultural spaces and new and remodelled public gardens and public routes in line with London Plan D4. The site would deliver 54,000sqm of the requisite commercial space to meet projected economic and employment growth demand until 2040. This quantity of floorspace would contribute to maintaining the City's position as a leading international financial and business centre.

214. Taking all these matters into consideration, it is considered that the proposals would conform to the City's plan-led approach as the site is in an area effectively identified by the 2015 Local Plan as appropriate for a tall building and within the emerging City Plan 2040 Policy S12 in accordance with London Plan D9 (B; 3), and notwithstanding the degree of conflict identified with emerging City Plan 2040 policy S12 with regards to height.

Tall Buildings – Impacts

215. This section assesses the proposals against the requirements of London Plan Policy D9 Parts C and D of the London Plan. The visual, functional and environmental impacts are addressed in turn and elaborated upon in the dedicated architecture, urban design and heritage sections which follow.

Visual Impacts – Policy D9 Part C (1)

216. The site is located to the west of the City in an established nucleus of tall buildings (which is intended to be formalised as a Cluster under the 2040 Plan) which form a prominent grouping of increased height around New Street Square and the Shoe Lane 'five dials' junction.

217. Completed in 1979 (and thus one of the oldest of the buildings), Hill House is located near the centre of this grouping. By virtue of the subsequent redevelopment of these taller buildings around it, Hill House is now one of the smallest in scale at 8 storeys, including plant – which at its tallest is 49.33m AOD. It is framed on all sides by the following schemes, existing or under construction:

- 6 New Street Square – 94m
- 120 Fleet Street – 93.15m AOD (consented, under construction)

- 1 New Street Square – 86.03m AOD
- 12 New Fetter Lane – 77m
- Stonecutter Court – 68.78m AOD (consented, under construction)
- Plumtree Court – 65.78m AOD

218. At 94.8m AOD the proposed redevelopment of Hill House would sit comfortably among these neighbouring schemes. It would be very slightly taller than the implemented scheme at 120 Fleet Street with which it would be closely grouped in strategic City and pan-London views. Officers support the overall form and massing strategy of the proposal with a sloping and terraced form articulated by cascading terraces with jagged crevices of planting giving charismatic articulation to the prominent south elevation. The proposal would form a distinct but complimentary addition to its neighbours and pleasantly diversify the forms and materiality of this emerging Cluster.

219. The impact of the proposals upon the City and wider London skyline has fundamentally informed the optimisation of the site, and long-range views (London Plan Policy D9 (C1; a; i) of the proposal have been tested in the HTVIA.

220. In baseline and cumulative panoramic views, the proposal would appear as an augmentation of the existing nucleus of tall buildings around New Street Square which are visible in these views, though their low height compared with the taller, more visually arresting buildings of the City Cluster. From the south-east the proposal would be largely screened by 120 Fleet Street; from other compass points the scale and stepped form of the proposal would assimilate well with the existing group of comparably-sized tall buildings around the site.

221. In baseline and cumulative river prospects, the proposal would appear as a prominent new element of the City's skyline to the west, particularly from western viewing points including Hungerford and Waterloo Bridges. Historic England have objected to the proposal's impact on the settings of designated heritage assets in these views. Officers acknowledge these representations but draw different conclusions as to the impact, discussed in detail in the Strategic Views and Heritage sections of the report. The stepped form of the proposal and articulation of the south façade would ensure it sits comfortably in these views and its general scale would fit neatly into this established group of tall buildings of comparable scale.

222. In relation to long range views, the proposal would comply with London Plan Policy D9 (C1; a; i).

223. Mid-range views (London Plan Policy D9 (C1; a; ii) of the proposal have been tested in the HTVIA. Historic England have identified harm to the settings of heritage assets in the viewing experience along the Strand. Officers acknowledge these representations but draw a different conclusion, discussed in the Strategic Views and Heritage sections of this report. In both baseline and cumulative viewing experiences from the Strand, Holborn Circus and the Temples, the upper reaches of the proposal would appear as a high-quality new addition to an established group of tall buildings of comparable scale, clearly legible as part of a disassociated modern group beyond heritage assets in the foreground of these views. In views along Cannon Street of St Paul's only a sliver of the proposals would be fleetingly glimpsed above the form of 120 Fleet Street.
224. In relation to mid-range views, the proposal would comply with London Plan Policy D9 (C1; a; ii).
225. Immediate views (London Plan Policy D9 (C(1); a; iii) have been tested in the HTVIA. When seen from the streets in the immediate vicinity of the proposal, the proposal would 'land' appropriately amongst the neighbouring tall buildings and would create high-quality new public realm around its base and particularly to Gunpowder Square. Architecturally the proposed building would be successfully articulated into a convincing base and well-designed upper storeys, with simpler elevations to the north, east and west designed to act as subtle foils to the elevations of the existing, surrounding tall buildings and allow the principal south façade with its extensive greening and charismatic articulation into stepped terraces to shine as the main architectural moment. This would also allow the proposal to act as a calm, well-designed modern backdrop to the views out of the Fleet Street Conservation Area and other places immediate locality; the proposal would be a judicious neighbour to the other tall buildings around New Street Square.
226. In relation to immediate views, the proposal would comply with London Plan Policy D9 ((C)1; a; iii).
227. In relation to London Plan Policy D9 ((C)1; b), the proposal would form a prominent new element of the existing nucleus of tall buildings around New Street Square. In this it would reinforce the existing spatial hierarchy of the locality in views from all ranges. It would help to reinforce the legibility of this location as one characterised by taller development than its surroundings and would thus support wayfinding by consolidating the identity of the place. In this, the proposal is considered to accord with London Plan Policy D9 (C1; b).
228. In relation to London Plan Policy D9 (C1; c), the architectural quality and materials would be exemplary and would be maintained through its life span.

229. Overall, the architecture is clearly well-considered in the round and of a high quality, and would be a visually distinctive and attractive addition to the skyline in and of itself.
230. Materials and detailed design would be the subject of conditions to ensure quality is maintained to deliverability on site.
231. A full assessment of the architecture, urban design and the public spaces is provided in the Architecture and Urban Design section. The development would comply with London Plan Policy D9 (C1; c).
232. In relation to London Plan Policy D9 (C1; d), the proposal would preserve the settings and significance of relevant heritage assets. Historic England and other third parties have objected to the proposal's perceived impacts on heritage assets, but officers, whilst acknowledging this, have reached a different conclusion. This is set out in detail in the Heritage section below. The proposals would accord with London Plan Policy D9 (c1; d).
233. In relation to London Plan Policy D9 (C1; e), the proposal would not be of sufficient scale as to be visible in relation to the World Heritage Site and therefore would not trigger this part of the policy, being de facto compliant with its aims.
234. In relation to London Plan Policy D9 (C1; f), the proposal, while visible in the background of views of and from the river, is sited at enough distance from the riverside to not trigger this part of the policy. It would be set well back from the riverfront, outside the Thames Policy Area. It would preserve the historic scale of the riverfront, the open quality and views of/along the river, avoiding a 'canyon effect', all in compliance with this part of the policy.
235. In relation to London Plan Policy D9 (C1; g), the proposal would not cause adverse reflected glare, this is addressed in the Environmental Impacts section of the report.
236. In relation to London Plan Policy D9 (C1; h) the proposal has been designed to minimise light pollution from internal and external lighting, which will be secured via condition. The potential light spillage impacts from the proposed development on surrounding existing residential buildings have been assessed and are addressed elsewhere in this report. The development has been designed in accordance with the details and technical requirements of the draft Lighting SPD.
237. In respect of 'Functional Impact' (D9, C(2)):

- The design has considered fire safety through the submission of a Fire Statement and consideration of measures to prevent falling, to ensure the internal and external design promotes safety of all occupants, and details for the latter are proposed to be secured through condition;
- The building would be serviced, maintained and managed to not cause disturbance to surrounding area, with details to be secured through condition and Section 106 obligation;
- The entrances, access routes, and ground floor uses have considered the proposed and surrounding pedestrian activity to ensure there is no unacceptable overcrowding or isolation in the surrounding areas, and further detail is to be secured through the Section 278 Agreement;
- The transport impacts have been considered and it is considered there is capacity in the area and the transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people working and visiting the building;
- The jobs, services, facilities and economic activity that would be provided by the development has informed the design to maximise the benefits including the enhanced public realm adjacent to the library use at Gunpowder Square , subject to Section 278 Agreement, and increased activity around the site including improved frontage;
- Subject to proposed conditions recommended by relevant consultees, the development, including construction, would not interfere with aviation, navigation or telecommunication, and it is not considered it would result in a significant detrimental effect on solar energy generation on adjoining buildings from the available information.

238. For 'Environmental Impact' (D9, C(3)), the wind, daylight, sunlight, thermal comfort, solar glare and noise have been carefully considered and it is considered this would not compromise comfort and the enjoyment of open spaces, including water spaces, and street level conditions around the building. This is considered further in the 'Environmental Impacts' section of the report.

239. For 'cumulative impacts', the relevant proposed, consented and planned tall buildings the area have been considered as part of the assessment and mitigation measures have been identified where required, and are proposed to be secured through condition.

240. For 'Public Access' (D9, Part D), the applicant has proposed access for the library use and for community and educational groups at dedicated times to the level 18 amenity space and terrace, to be secured in the Section 106.

Tall Building, Conclusion:

241. Officers conclude that the site would be appropriate in principle for a tall building and the impacts of the proposal are considered acceptable. The proposal would comply with London Plan policy D9 (A, B, C and D) and Local Plan 2015 Policy CS14 (3). Although there would be a degree of conflict with emerging policy S12 with regard to height as a result of the proposal's breach of the highest (90m) contour of the emerging Holborn and Fleet Valley Cluster, it is considered that the proposal complies with emerging Policy S12 with regard to location, impacts, design and public access. It is not considered that the degree of conflict identified with a material consideration afforded limited weight outweighs the adopted development plan nor the acceptability of the proposed tall building.

The existing site, surrounding context, and contribution to townscape

242. Hill House is located within a cluster of mid-rise commercial buildings approximately 140m north of Fleet Street. It is an island site, bound by Gunpowder Square to its southwest, Printer Street to its northwest, Little New Street to its north, Shoe Lane to its east and Wine Office Court to its south.

243. The site is not located within a Conservation Area, but is located on the northern boundary of the Fleet Street Conservation Area, and within 250-500m of several others. To the west- Chancery Lane, Temples and the Strand Conservation areas; to the north – Hatton Garden and Smithfield; To the east – Newgate street, Postman's park and St Pauls Conservation Areas; To the south – Whitefriars Conservation Area.

244. The site sits in the aforementioned nucleus of tall buildings around New Street Square and the Shoe Lane 'five dials' junction, just to the north of the Fleet Street Conservation Area, which it is distinct from by virtue of its much coarser urban grain, which is experienced as a campus of individual large-footprint commercial buildings of scale, ranging in height between c.74m AOD and c.93m AOD.

245. To the southwest of the site however, the scale and character is smaller and more traditional, relating to the character and appearance of the Fleet Street conservation area, with buildings fronting onto Gough Square, Wine office Court and Gunpowder square being c.5- 8 stories, and faced with red brick.

246. Hill House has a distinctly brutalist aesthetic, formed from robust concrete horizontal panels which clad the building from the first to fourth floor. Above the fourth floor, the stories are set-back in a pyramidal stepped form, creating a shoulder height which broadly aligns with the buildings to the southwest. The

upper 4 floors are clad in bronze-coloured metal framing and cladding with bronze-tinted windows. Centred on the east and west ends of the building are narrow concrete stair towers that rise up and form the tallest parts of the building. The ground floors are set back behind the upper building line which is supported by large concrete columns, interspersed with modern office and servicing entrances. The extensive ground floor perimeter of the site, including the route between Little New Street and Wine Office Court, is predominantly inactive with large stretches of double-height blank frontage, giving it a defensive, introspective character. Generally, the ground floors are considered to perform poorly in terms of accessibility and wayfinding and are not considered to make a positive contribution to the surrounding streets. While the building offers a route through its middle, the public realm at the base of the building is also generally of poor quality, with patchy and uneven ground surfaces, with little urban greening or places to stop and rest.

247. Overall, officers consider the building to be without especial architectural merit, making a poor contribution to the surrounding streets due to its lack of active frontage, poor entrance design, and harsh streetscape design.

Architecture and urban design

Bulk height and massing

248. The height, massing, and overall expression of the development has been carefully considered in relation to key townscape views from Monument, Cannon street, the Strand and river Thames, in addition to the existing and emerging context of tall buildings in this locality.
249. As such, the proposed massing steps up from its lowest point in the south west corner, fronting Gunpowder Square, to its tallest point in the north east corner, which addresses the prominent junction at 'five dials'.
250. The southwestern corner strikes a commensurate shoulder height with Pemberton House and Peterborough Court - some of the smallest scaled buildings within the site's local context. From floors 1-4, this corner would also feature terraces, with deeply recessed glazing, consciously easing the massing of the building away from the public realm, to enhance the sense of spaciousness around Gunpowder Square. Above this corner, from level 4 upwards, the massing gradually increases to its total height of 94.80m AOD in the northeast.
251. The massing has been designed and carefully sculpted to mediate the change in scale between the southwest and northeast, and makes this transition

through cascading terraces which sweep up and curve across the façade, carving out massing, and prising apart two subtly differentiated volumes diagonally across the site; the smaller of the two being to the south, and larger to the north. The bulk and massing of the building is softened by the inclusion of set back terraces on every floor of the building. From level 4 onwards, the terraces increase in size at each level, meaning the building gradually tapers back and creates a unique floorplate at each level. The sweeping central curve of the building extends to its very top, and dissects the top floor roof pavilions so they appear staggered, visually breaking up the whole southwest elevation. Each pavilion is two storeys in height which helps express the top of the building, and like the rest of the building, both levels are deeply set back behind generous roof gardens. In combination with their lighter-coloured materiality, these pavilions would create a clear distinction from the middle of the building in terms of scale, proportion, and elevation design. The sculptural form of the building's massing, which breaks the building down into a series of different elements, is considered to successfully reduce its overall bulk, in addition to giving the building a unique silhouette, which in combination with the generosity of the terraces, would soften its appearance in local views, as well as providing high-quality external amenity spaces for office users to enjoy.

Expression and materiality:

Ground floor

252. The proposed base of the building would be clearly defined and well proportioned, with the majority of its curved frontage being wrapped with double-height clear glazing, to maximize active frontage, and promote a positive interactive relationship with the surrounding streets. Like the existing, the ground floor frontages are recessed on all sides, with the building above supported by concrete columns. However, these are well-spaced and of a more compatible size, such that they do not impede views into the building, or feel overbearing. The design of these columns is simple, with a band of fluting at their base. The ground floor building line is also curved, helping to subtly guide people around its base, as well as tying into the overarching architectural language of the building, which uses softened rounded edges on all corners.
253. Each ground floor elevation has been designed slightly differently to respond to their particular uses, and where possible, are all united by high levels of visibility deep into the floor plans, and views around their corners to surrounding streets.
254. The southwest corner would provide the entrance to the Shoe Lane Library, with a clearly expressed entrance portal and signage zone. The library frontage would be deeply recessed, providing greater space for the public realm, the design of which is well integrated with the architecture the southwest

corner, giving it a rich, green and civic character. The frontage would be made from double-height glazed bay windows enabling views into the expansive high-spec modern library. The detailed design of the organic and asymmetric soffit to this entrance will be conditioned, however, the design intent is for this to be clad in a light-coloured aluminium, and be stepped according to each layer of lighting channels, to give this surface a dynamic feel, with a high degree of articulation. The entrance would also be framed by two columns, which are given their own subtly different character, with inset bronze to their fluted base, in addition to shadow gaps at their top. While these are fine details, the attention to detail here is positive and would ensure the design of this entrance is of particularly high quality, and subtly different from other entrances, to reinforce the civic character of the library.

255. The rest of the western ground floor frontage would be activated by entrances to the gym, and flexible office/retail/ café, with only a single solid bay required to provide access to the fire stair. The extensive clear glazing would wrap around the entire northern frontage, culminating in the office entrance. Facing east, the office entrances would be set back from the roads, and be given breathing space behind a generously-sized planter which, like the one for the library, would provide an attractive and inviting planted frame to the entrance. The detail of the return elevation to the entrance will be conditioned to ensure the high quality of the design intent is sustained. Just to the south of this, is the dedicated entrance to the rooftop restaurant – with a decorative spandrel panel concealing the first floor slab behind. With the exception of the entrance to the library, all bay windows and entrances would use dark bronze frames.

256. From the southeastern corner, to the middle of the southern elevation the ground floors would be predominantly solid, concealing the loading bay and serving area. With the exception of the upper floor windows, all bays would be clad in dark bronze louvered panels, with a framing system to articulate large chevron direction arrows. These shapes would also be in dark bronze, with the arrows differentiated through a change in panel texture.

Upper floor elevations

257. Above the ground floor, the elevations to the middle portion of the building would be set out over a 1.5m facade grid, and be clad in two types of aluminium panel within a unitised aluminium system. The primary emphasis on all facades is verticality, which would be expressed by light toned vertical piers/fins. Composed of PPC aluminium, these fins would be given a cream stone effect, with a matt finish and subtle sparkle, to imitate stone. These fins would have a curved face – and V shaped plan form. The benefits of this profiling would be twofold, firstly increasing solar shading and secondly providing greater depth, interest and articulation to the facades.

258. Sitting behind these fins, is the secondary horizontal façade element of dark bronze spandrels in a matt finish. All corners of the building would be treated with curves, which the bronze spandrels would adorn. While the details of these features will be conditioned, the design intent is to create bands of soft smooth corners, which in combination with the profiled fins would become two of the defining architectural features of the building.
259. Importantly, above the base of the building, the proposed development incorporates four façade types, that respond to their orientation. Each type uses the curved fin, but at a different scale/proportion, to create a hierarchy of facades across the building.
260. As described above, the main façade is spaced according to a 1.5m grid, with slim fin widths which run the full height of the storey. For the terrace façade, the fin width and their spacing would double to create a facade that feels more open. On these elevations, the fins would break through and extend above the horizontal spandrel line to reinforce the vertical emphasis of the building. The façade of the 'sweep' would share the fin dimensions of the main façade, but the spacing between them would half, to give this elevation more solidity, and emphasize the dynamic character of the south-west elevation in prominent views. Finally, the rooftop pavilions would be given the grandest order, being triple the width and spacing of the main elevation, in addition to a lighter tone, to clearly express its top and create a visual distinction with the floor below. The articulation and detail given to these pavilions is considered successful in crowning the top of the building, and creating an expressive and celebratory movement in the townscape. Similarly, the corners of the building have been kept simple, with no fins, so that their pleasing curved radiuses are readily legible on approach.
261. With the exception of the northern façade, areas of glazing will also incorporate fritting to ensure that, along with automated blinds, the proposed scheme achieves the ambitious 40 W/m² perimeter solar gain target. A study will be undertaken to ascertain the precise locations of the facades which require this treatment. Officers are satisfied that this would be acceptable in principle, and would not negatively impact the overall appearance quality of the facades.
262. Terraces and their landscaping also form an integral feature of the architectural design of the building and are present at every level. The planting design has been developed alongside the key architectural moves to reinforce verticality and break up the massing. In particular, the terraces would feature a significant number of trees (c. 85), with variation in species, ranging in size from large specimens which could reach 5-6m tall, to smaller specimens of – 3-4m tall. The proposed tree species have been selected according to their hardiness

and adaptability to a range of conditions, not least wind exposure and extreme drought conditions. Planting beds have also been specially designed to ensure they can accommodate enough root-ball space for trees to thrive while balancing the overall size of the bed within the terrace. By virtue of the proposed levels of tree planting and other planted areas, the proposal would significantly increase the levels of urban greening within the area, though final details on the planting specification, and maintenance of these areas will be conditioned.

263. Terraces would be enclosed by simple clear frameless glass balustrades (1.4m tall), with curved corners. Balustrades have been designed to be visually unobtrusive, and not detract from the composition of the facades. Further details of these will be secured via condition.

Public realm design

264. Proposals include landscaping enhancements to the southwestern corner of the site, at Gunpowder Square, and the northeast corner of the site at the main office entrance. Proposals would also result in the loss of city walkway, as the route through the middle of the site would be removed. Enhancements to Gunpowder Square would improve the quality of the pedestrian experience along the predominant pedestrian desire line.
265. Working with the Libraries Team, the design aims to create a reinvigorated and welcoming place, that supports greater biodiversity and provides a green foil to the library. The strategy includes a series of planted areas on the east and west edges of the square, with replacement trees, and would increase the overall quality and quantity of planting into the ground. Connected tree pits and larger soil depths would provide improved conditions for tree planting over the existing condition, which is highly constrained and consequently the trees have struggled. The shape of the beds would provide smaller intimate areas within the landscape which would be integrated and defined by benches. The proposals for Gunpowder Square will be delivered through a s278 agreement by the City of London. Final details of the planting strategy will be agreed through consultation with City Gardens to ensure the specification is appropriate to the location and will thrive in these specific microclimatic conditions.
266. In addition to ground level interventions - brass inscriptions inlays - further design development will also include incidental play features, potentially in the form of interactive art, to bring greater interest and interactivity to this civic area for children. This strategy will be devised in conjunction with community engagement, to ensure it makes a meaningful and enriching contribution to placemaking.

267. All ground level hard surfaces will be York stone, to tie into the City of London Public realm toolkit, and ensure the area feels fully public and integrates successfully into the City's wider public realm network.
268. Overall, officers consider that the organisation and layout of this area would support the use of the library, and significantly enhance the character of the public space. The higher levels of planting would also support local ecology, through the provision of habitat. Feature seating – which has been designed to be inclusive, with different height seats, arm and backrests, and niches to allow space for wheelchair users and pushchairs – would also provide much-needed additional seating within the area. The orientation of the seating would also create social dwell spaces, where people can face one another and interact, the space would have a positive relationship with the proposed library. Furthermore, the adjacent context of the square is historic, and officers consider that the proposals would have a positive synergy with the neighbouring conservation area by providing an improved space set in and amongst a network of human scale and enclosed routes and spaces on the journey from Fleet Street to the application site.
269. Notwithstanding the approved drawings, the final details of the landscaping including full planting specification, layout, hard and soft materials, furniture, maintenance regime, and irrigation methods will be delivered through a S278 Agreement, in accordance with the City of London Technical Toolkit, to ensure the design and materials are of high quality, and to ensure the landscape thrives and is of acceptable design quality, and is fully inclusive. Officers consider the design of Gunpowder Square would provide a dynamic, characterful and inclusive public space where people can sit, rest or enjoy. The planting would also significantly enhance the level of urban greening, within this area of the city. The proposals would therefore enhance the overall quality and character of this key pedestrian space, which was previously underutilised and transitory.
270. While the proposals would not reprovide a route through the centre of the building, as existing, officers do not consider this to be detrimental to pedestrian movement, or the legibility of the area. The extensive contribution of active frontage, and high quality landscaping around the site as would be provided to offset this change, the upgrades to Gunpowder Square would enhance the quality and function of the public realm on the pre-dominant pedestrian desire line. Provision of attractive landscaping and seating would provide pedestrians with visual interest and an opportunity to rest and dwell.

Conclusion on architecture and public realm design

271. Officers consider that the architectural design of the building would be compatible with the existing context, being read as a well-layered piece of design, which celebrates moments in the public realm. Officers consider that the sculptural form of the building's massing, which breaks the building down into a series of different elements is successful, and responsive to its context, while also delivering a unique piece of architecture with its own identity and well-articulated facades. Furthermore, the ground floors would be transformed to be outward facing and visually permeable, encouraging positive relations between the ground floor uses and the adjacent public realm, the base would be an integral part of the arrival experience from all directions. The façade treatments at ground floor level are well-suited to pedestrian desire lines and sightlines, and particular care and attention has been paid to meet the needs of pedestrians and cyclists. The prominent and attractive cycle hub entrance would be accessible and visible to cyclists arriving at the site, providing high-quality facilities that would promote active travel.
272. The proposals would also dramatically enhance the landscaping of the site, providing much richer and more dynamic planting and greater opportunities for sitting. The proposals would therefore enhance the overall quality and character of this key pedestrian space, which was previously underutilised and transitory.
273. The architecture and urban design proposals comply with Local Plan Policies CS10, DM10.1, DM10.3, DM10.4, DM10.8 and DM19.1 emerging City Plan Policies S1, S8, DE2-8, HL1, and London Plan Policies D3, D4 and D8, paragraphs 130 and 132 of the NPPF and the City Public Realm SPD all require high-quality public realm and increased urban greening.
274. Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate employment growth and would increase the amount of high-quality office space. The proposals align with the function of the City to accommodate substantial growth in accordance with Local Plan Policies CS1: Offices and London Plan Policies SD4, SD5 and E1.
275. Irrespective of the approved drawings, full details of the ground floor frontages, design and materiality of the public realm improvements, and way-finding strategy are reserved for condition to ensure these are well-detailed and are useable. The development has had regard for Local Plan Policy DM 3.2 and the Mayor's Public London Charter promoting a safe, inclusive and welcoming environment.

276. A high-quality signage strategy for the proposal would be required and would be secured via condition.

Strategic Views

Policy context:

277. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13 and emerging City Plan 2040 policies S12 and S13 all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. These policies seek to implement the Mayor's London View Management Framework (LVMF) SPG (the SPG), protect and enhance views of historic City Landmarks and Skyline Features and secure an appropriate setting and backdrop to the Tower of London.

278. A Built Heritage, Townscape and Visual Impact Assessment has been prepared and submitted as part of the application documents.

279. For clarity, the application site is located in the west of the City, at considerable distance from the World Heritage Site. Intervisibility between the two has been tested in the TVIA, confirming that the proposal would have no visual relationship with and would therefore have no impact upon the World Heritage Site.

London View Management Framework (LVMF) Impacts

280. The LVMF designates pan-London strategic views deemed to contribute to the Capital's character and identity at a strategic level. Those relevant strategic views where there would be a material impact are addressed here against London Plan Policy HC4 and associated guidance in the SPG.

281. The site is located within the Wider Setting Consultation Area (WSCA) of LVMF 5A.2 Greenwich Park, and the proposal would breach the WSCA height threshold, triggering qualitative assessment of its impact on the view.

282. Additionally, the WSCAs of LVMF 6A.1 Blackheath Point and 4A.1 Primrose Hill pass very close to the application site. While the site does not fall directly into 6A.1 or 4A.2, for completeness officers have assessed the impact of the scheme on the edges of these viewing corridors, as these frame the composition of the viewing planes. Officers have also assessed the impact of the proposals on LVMF River Prospects.

View 5 (5A.2), London Panorama, Greenwich Park:

283. The impact would be perceived from Assessment Point 5A.2, at the eastern extent of the panorama towards central London and St Paul's Cathedral, which is the sole Strategically Important Landmark (SIL), inclusive of the Protected Vista. Other relevant identified landmarks include Tower Bridge, the Monument, the Shard and the City Cluster. The proposal would breach the Wider Setting Consultation Area (Background) of the Protected Vista.
284. The visual management guidance identifies the background of St Paul's as mostly unimpeded, with a clear silhouette afforded to the dome (above the peristyle) and western towers, whilst the sky-etched silhouette is considered crucial to the ability to recognise and appreciate the Cathedral (paragraph 142). In the baseline and cumulative scenarios, the proposal would be sited south and west of the Cathedral, appreciated at a noticeable distance from the Cathedral and be almost entirely shadowed by other tall intervening built development of a similar total height, most notably 120 Fleet Street, which would obscure all but the top two floors of the proposal. The proposals would appear as a discreet, high-quality additional element to the existing nucleus of tall buildings at New Street Square that are visible in this view.
285. The proposals would therefore form part of an established and coherent group of tall buildings, which would not 'crowd' or create a 'canyon effect' to the wider setting of the Cathedral and therefore not impact the viewer's ability to appreciate the dome and upper parts of the western towers of St Paul's Cathedral or unacceptably impose on the landmark, all of which would still be given appropriate context, reserving their setting and contribution to the special characteristics of the view, in accordance with paragraphs 57, 58, 60, 61, 63, 146 and 147 of the SPG.
286. Overall, the proposal would not harm the characteristics or composition of the strategic view and its landmark elements, including the ability to recognise and appreciate St Paul's as the SIL.

Wider LVMF panorama considerations:

287. As mentioned, the WSCAs of LVMF 6A.1 Blackheath Point and 4A.1 Primrose Hill pass very close to the application site. For completeness, the proposal's impact on these is assessed below.
288. The Primrose Hill assessment point 4A.1, located at the summit of the hill, allows the perception of considerable detail, including the principal buildings in central London, principally in this case St Pauls Cathedral, and the Shard. Views of the proposal would be virtually imperceptible by virtue of its location, and commensurate height, within the existing consolidated cluster of tall

buildings which sit between St Pauls and the Shard. Overall the proposal would preserve the composition of the view, and the viewer's ability to recognise and appreciate the salient features of St Paul's in accordance with paragraph 132 of the SPG.

289. The Blackheath point panorama 6A.1 centres on the viewer's ability to recognise and appreciate and St Pauls Cathedral and its western towers as the sole SIL in the middle of the view. Officers consider that due to the significant distance between, and the limited visibility of the proposals due to the consented proposals at 120 Fleet Street which would block the majority of this building from view, there would be no impact on the qualities or composition of the protected vista and the ability to recognise and appreciate the SIL in accordance with para 156 of the SPG.

River Prospects

LVMF 11A.1: London Bridge: The Upstream Pavement

290. St Paul's Cathedral is the sole SIL, while other landmarks include the Cannon Street Station towers, the Old Bailey and St Bride's Church in a broad and deep riparian composition. The visual management guidance identifies the skyline presence of St Paul's and the positive visual interaction it has with the 'Wren-esque' Cannon Street Station (paragraph 191).

291. In the baseline and cumulative scenarios, the proposal would not dilute this dynamic, in accordance with paragraphs 193-4. The proposal, situated at a discernible distance to the west of the Cathedral and of an appropriate height and attractive form on the horizon, would be almost entirely screened by the implemented scheme at 120 Fleet Street, with only a small portion of the top visible.

292. As such, the proposal would not visually dominate the Cathedral in accordance with paragraphs 194 and 197, consolidating a small cluster of taller buildings around New Street Square, and it would not obscure or detract from any contributing landmark in the composition, in accordance with paragraph 195.

293. Overall, in the baseline and cumulative scenarios, the proposal would not harm and would make a positive contribution to the characteristics and composition of the strategic view and its landmark elements, including preserving the ability to recognise and appreciate St Paul's as the SIL.

LVMF 12A.1: Southwark Bridge: The Upstream Pavement

294. St Paul's Cathedral is the sole SIL, whilst other landmarks include Millennium Bridge and St Bride's Church in a broad riparian composition.

295. The visual management guidance, paragraph 209, describes the broad expanse of the River as dominated by St Paul's. The proposals would largely be obscured behind Faraday house and 120 Fleet Street, with only fleeting elements of the proposed uppermost pavilions visible. As such, the proposal would form part of an established and recessive backdrop populated by the small cluster of tall buildings around New Street Square - perceived at some distance from the Cathedral. In accordance with the guidance, the proposal would not harm the viewer's ability to recognise and appreciate the Cathedral or dominate it. Furthermore, the high-quality architecture would complement its wider skyline setting, in accordance with paragraphs 211 and 214.
296. The proposal would not obscure or detract from a contributing landmark or feature (in accordance with paragraph 212, although the site is not within the foreground); by virtue of the intervening distance, the distinctive vertical presence of St Bride's steeple would be unchallenged.
297. LVMF view 12A.2 is orientated southwest, and the proposal would have no additional impact.
298. Overall, the proposal would not harm the characteristics and composition of the strategic view and its landmark elements, including preserving the ability to recognise and appreciate St Paul's as the SIL.

LVMF 13A.1: Millennium Bridge and Thames side at Tate Modern

299. St Paul's Cathedral is the sole SIL, while wider landmarks and contributing features are Millennium Bridge and several Wren church towers and spires which contribute greatly to the wider setting of St Paul's.
300. The visual management guidance identifies the dominance of the bridge and St Paul's, whereby the St Paul's Heights has preserved an appreciation of the Cathedral above cornice line, whilst some tall buildings, including the Barbican Towers, compromise that backdrop (paragraph 225). It recognises how the Heights has led to an unrelenting horizontal emphasis of those middle ground buildings relieved by the spires and towers of the City churches (paragraph 226).
301. The proposal would be sited just west of centre within the prospect, and as such would not 'crowd' close to St Paul's or undermine the visibility or dominance of the Cathedral in accordance with paragraphs 227-9 of the visual management guidance in the SPG. The proposal would not harm the contribution of a landmark or contributing feature, preserving the historic skyline and the juxtaposition of elements including river frontage and

landmarks, whilst allowing these to continue to be enjoyed in their context, in accordance with paragraphs 68, 69 and 70 of the SPG.

302. The striking tiered form and silhouette, which would be seen beyond 120 Fleet Street would add a high quality new architecture which, with its sculptural form created by tiers of external terracing, would assist in relieving that ‘unrelenting horizontality’ referred to in the SPG.
303. Overall, the proposal would not harm the characteristics and composition of the strategic view and its landmark elements, including preserving an ability to recognise and appreciate St Paul’s Cathedral as the SIL.

15B.2: Waterloo Bridge: The Downstream Pavement (with night time – southern end)

304. St Paul’s Cathedral is identified as the sole SIL in this iconic London view and River Prospect, with other landmarks and contributing features including Temple Gardens, St Bride’s and the Old Bailey. The river defines the foreground, while the eye is drawn towards Temple Gardens, St Paul’s Cathedral and the City Cluster.
305. The proposed development would not be visible from LVMF 15B.1 and would emerge into view during the kinetic experience between 15B.1 and 15B.2. Here it would rise above the foreground buildings enclosing the river in the middle ground, and form part of a secondary layer of background townscape composed of similarly scaled modern commercial buildings to the north of Fleet Street. The sweeping and stepped façade of cascading terraces would contribute a high-quality new piece of sculptural architecture to the view
306. Whilst the proposal would modestly consolidate it, the existing nucleus of tall buildings around New Street Square is set at some distance away from the Cathedral in this view and the proposal would not draw it closer to the Cathedral, preserving the composition of the view, including the sky backdrop of St Paul’s, avoiding a ‘canyon effect’ and would not dominate the SIL, in accordance with the relevant visual management guidance at paragraph 264 of the SPG.
307. Historic England have identified that the proposal would have a harmful impact on the setting and significance of the Strand and Temples Conservation Areas, by virtue of the development’s presence in the view, which they considered to draw attention away from these heritage assets, thereby harming the character and appearance of the conservation areas and the ‘perception of the significance’ of (unspecified) listed buildings.

308. Officers disagree with this conclusion. Paragraph 262 of the SPG requires proposals to show how they contribute to the settings and spaces and buildings immediately fronting the river.
309. The proposal would nestle into to the existing background of modern mid-rise developments around New Street Square which already define the skyline of this viewing experience. These are already read as recessive background elements, separate from rather than competing with the Temples and Strand CAs in the foreground.
310. The proposal's distinctive green landscaped terraces, articulated with tall and medium sized trees, would rise out of and complement the verdant foreground distinctive of the Victoria Embankment, sloping away from the pre-eminent foreground setting of the river, and complementing the verdant character of the Temples.
311. As such, the proposal would comply with paragraph 262 of the SPG and would preserve the settings of the Strand and Temples conservation areas, including the juxtaposition between elements and the river frontage which would still be enjoyed in their context, in accordance with paragraphs 68-70 of the SPG.
312. Further consideration of the impact on the heritage assets of the Temple is given in the Heritage section of the report below.
313. Overall, the proposal would not harm and would make a neutral contribution to the characteristics and composition of the strategic view and its landmark elements, including the ability to recognise and appreciate St Paul's as the SIL.

16A.1: The South Bank: outside Royal National Theatre

314. The view is principally focused on Somerset House and its immediate setting as described in the SPG. Other landmarks include Waterloo Bridge and the Fleche of the Royal Courts of Justice. St Paul's Cathedral is the sole SIL in this view, located at the furthest, easternmost periphery of this broad river prospect.
315. The visual management guidance describes the dominance of the River in the foreground, and has been positioned to capture the Grade I Listed Somerset House as its principal focus. The view also captures Temple Gardens, and remarks on the low profile both features display. It goes on to identify how, due to the topography of rising ground, the background of this is backdropped by buildings (paragraph 271). The verdant density of trees along the Embankment are also identified as an important element in the view (paragraph 272).

316. It is considered that the proposal would preserve the pre-eminence of the open prospect over the river and skyline presence of the Temples. It would comprise an attractive part of the established backdrop of larger commercial/institutional buildings transitioning in scale from that foreground to Fleet Street and the more recent developments around New Street Square. Its attractive sweeping form would offer a new high-quality piece of architecture with a skyline presence that would complement the varied layering of the townscape from here. Its position on the skyline in the centre of this view, combined with its height and scale, will help integrate the adjacent 120 Fleet Street within the background skyline, reinforcing the coherence of a group of similarly scaled modern commercial buildings to the north of Fleet Street, all in accordance with paragraph 69, 70, and 72 of the SPG.
317. Sited at some considerable distance from the landmark, the proposal would not dominate or be detrimental to the setting or skyline of Somerset House in this view, in accordance with paragraph 274. Similarly sited at some distance away, it is considered that the proposal would preserve the ability to recognise and appreciate St Paul's as the SIL, which would remain the pre-eminent focus.
318. Overall, the proposal would not harm and would make a neutral contribution to the characteristics and composition of the strategic view and its landmark elements, including the ability to recognise and appreciate St Paul's as the Strategically Important Landmark ("SIL").

16B.1 and 16B.2: The South Bank: Gabriel's Wharf viewing platform

319. St Paul's Cathedral is identified as the sole SIL, whilst other relevant elements are St Bride's Church and Temple Gardens.
320. Sited at some distance from the Cathedral in this view, and clearly belonging to the existing nucleus of tall buildings at New Street Square, the proposal would preserve the townscape setting of the Cathedral in accordance with paragraph 280. It would preserve the ability to recognise and appreciate St Paul's as the SIL, which would remain the pre-eminent focus throughout the viewing experience at and between the Assessment Points, and in architectural treatment the proposal would be clearly read as a separate, modern entity unrelated to and at some distance from the Cathedral, all in accordance with paragraph 283 of the SPG.
321. Historic England have identified that the proposal would have a harmful impact on the setting and significance of the Strand and Temples Conservation Areas, by virtue of the development's presence in the view, which they considered to draw attention away from these heritage assets, thereby harming the character

and appearance of the conservation areas and the 'perception of the significance' of (unspecified) listed buildings.

322. The visual management guidance describes the dominance of the river in the foreground, with those buildings on the north side providing a rich and intricate skyline; reference is made to the subtle transition of scale between the Temples and the more recent commercial development on Fleet Street/Ludgate (paragraph 278). Paragraph 282 of the SPG notes several landmarks and historic buildings other than the Cathedral present in the view, and that the ability to recognise these should be preserved or enhanced.
323. Officers disagree with Historic England's conclusions and consider that the proposal would preserve the pre-eminence of the open prospect over the river and skyline presence of the Temples and other Victorian/Edwardian buildings defining the Victoria Embankment. Furthermore, the development would form part of and positively contribute to the established backdrop of larger commercial/institutional buildings transitioning in scale from that foreground to Fleet Street and the more recent developments around New Street Square.
324. The proposal's attractive sweeping form and well articulated elevations would offer a new high-quality piece of architecture with a skyline presence that would complement the varied layering of the townscape from this view. Its position on the skyline, combined with its height and scale, would help integrate the adjacent 120 Fleet Street within the background skyline, reinforcing the coherence of a group of similarly scaled modern commercial buildings to the north of Fleet Street.
325. Overall, the proposal is considered to comply with the test in paragraph 282 and would preserve the settings of the Strand and Temples conservation areas. It would not harm the characteristics and composition of the strategic view and its landmark elements, including the ability to recognise and appreciate St Paul's as the SIL and Temples.

17B.2 and 7B.1: Golden Jubilee/Hungerford Bridge – crossing the Westminster Bank

326. St Paul's is the sole SIL, while given the raised and broad panorama here there are many landmarks and contributing features, including St Bride's, the Royal Courts of Justice and the Old Bailey, amongst others.
327. The SPG describes the River as defining the foreground and middle ground, enlivened by Waterloo Bridge and the Embankment trees creating a significant sense of horizontality. It identifies St Paul's as rising above the general townscape, including the City Cluster off to the right, while St Bride's and Old

Bailey are identified as distinctive vertical elements seen against sky as are, to the Barbican's trio of towers.

328. The setting of St Paul's, as the singular most important structure, would be preserved in accordance with paragraph 301, the proposal being of an appropriate height, set at some distance away from the Cathedral. It would strengthen the sense of a smaller cluster of taller built development around New Street Square, complementing the presence of 120 Fleet Street, forming a secondary layer of mid-rise development towards the centre of the view. It would have no impact on Somerset House, in accordance with paragraph 302.
329. The proposal would not obscure or detract from a landmark, discernible at some distance from the distinct vertical skyline presence of St Bride's, the Old Bailey and Barbican Towers ensuring the landmarks and contributing features would have their settings preserved, in accordance with paragraphs 68-70 of the SPG.
330. Overall, the proposal would not harm and would make a positive contribution to the characteristics and composition of the strategic view and its landmark elements, including the ability to recognise and appreciate St Paul's as the SIL.

18B.1 Westminster Bridge – Downstream

331. The River dominates the foreground whilst in the middle ground the prominence of Country Hall and the London Eye capture the view, alongside the Shell Centre in the background. In the wider prospect, there is a consistent formal and civic scale character to the buildings enclosing the meander of the River as Westminster transitions to the City. This has a largely consistent but lively skyline datum, relieved by some more vertical built form, such as the fleche of the Royal Courts.
332. The proposed high-quality architectural form, particularly with its sculpted sweep of terracing, would provide a new attractive form which would contribute interest to the distant skyline, creating a distinctive vertical inflection appropriate to the wider scale of built form enclosing the River.
333. The proposal would relate well to the setting of those foreground and middle ground landmarks and would contribute positively to the setting of heritage assets, in accordance with paragraphs 323-24 of the visual management guidance. It would respect and enhance the civic nature of those north bank buildings and would not diminish their role and clarity, in accordance with paragraph 325 of the SPG.

334. Overall, the proposal would not harm and would make a neutral contribution to the characteristics and composition of the strategic view and its landmark elements.

Summary of LVMF Impacts

335. The proposal would preserve the characteristics and composition of relevant strategic views and their landmark elements. It would preserve the viewer's ability to recognise and appreciate St Paul's Cathedral as the relevant Strategically Important Landmark. It would ensure that the juxtaposition between elements, including the river frontage and key landmarks, can be appreciated in their wider London context. This is in accordance with Local Plan Policy CS13(1), London Plan Policy HC4, emerging City Plan Policy 2040 S13 and guidance contained in the LVMF SPG.

City of London Strategic Views

336. The City of London Protected Views SPD identifies views of St. Paul's Cathedral, the Monument, the Tower of London World Heritage Site and other historic landmarks and skyline features, which must be assessed in relation to proposals for new built development. The proposed development site is located within the western periphery of the City of London, and as such falls outside of the St Pauls Heights policy area, and is located at a significant distance from the Tower of London World Heritage Site Local setting study area.

337. Kinetic views from the Southbank and the river bridges are identified in the SPD. Heritage significance of relevant historic City landmarks is considered below within the section on indirect impacts to heritage assets.

Monument

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

Views from the Monument:

339. The proposal would be outside the field of view scope of all the Monument Views except for View 5. The Surveyor to the Fabric of St Paul's Cathedral has identified a minor level of harm to the Cathedral's setting as experienced in this view as a result of the proposed development.

View 5: North West to St Paul's Cathedral – Impact

340. From here St Paul's and St Bride's Church are identified as the key features. The visual management guidance at paragraphs 4.12 and 4.13 of the Protected Views SPD identified other features in this panorama such as St Mary le Bow, the cupola of the Old Bailey, the BT Tower and St Mary Aldermanry. The skyline presence of these features would not be obscured or detracted from by the proposal.
341. Paragraph 4.13 identifies the drum, peristyle and dome alongside the tops of the western towers. At present the dome is on the whole seen above a horizon datum as the pre-eminent element on the skyline. The drum, peristyle and south west towers are, on the whole, shadowed by taller built development around New Street Square, diminishing the presence of the Cathedral silhouette on the skyline.
342. The proposal would be almost entirely screened by the implemented scheme at 120 Fleet Street, with only the very uppermost floors slightly visible above. Although visually and architecturally distinct from 120 Fleet Street, mitigating any perception of coalescence, the proposals would slightly increase the massing adjacent to, but not behind, the gilded finial and pineapple at the top of the south-west tower of St Paul's Cathedral. The setback top floors and their shape would ensure the golden finial remains legible against open sky; the visibility of the topmost storeys of the proposal near the finial would be so recessive that, overall, officers consider that the proposals would result in no additional adverse impact over the implemented scheme at 120 Fleet Street.
343. As a composition, it is considered that the proposals would accord with paragraphs 4.3 of the Protected Views SPD, in that the proposal would not obstruct it, nor would it detract from the general open prospect and those landmark elements as a result of appropriate bulk and massing.
344. Overall, officers consider the proposed development would protect this significant local view from the Monument, in accordance with Local Plan Policy CS 13 and emerging City Plan Policy S13 and guidance contained in the Protected Views SPD.

Views of and Approaches to the Monument:

345. The proposal is not in the defined Immediate Setting of the Monument and would have no impact on those identified views of/approaches to the Monument as identified in the Protected Views SPD.

St Pauls Cathedral

St Paul's Heights and the Processional Approach:

346. The proposal is not located in the defined St Paul's Heights Policy Area. The St Pauls Heights policy seeks to preserve the foreground setting of the Cathedral in strategic riparian views across the Thames from the South Bank and London Bridges, as longstanding protection to secure an appropriate setting of St Paul's Cathedral in Local Views. As demonstrated by verified views submitted within the THIVA, the viewing experience of St Pauls from these locations would not be impacted, as a result of the proposals, given the substantial distance between Hill House and the policy boundary, and the secondary layer of townscape/built-form which falls in-between the site and the Policy Area..
347. It would not be visible in views of the Cathedral on approach from Fleet Street along the Processional Route, by virtue of the development site being located approximately 112m from the street, and screened by Stonecutter Court immediately to the south. The kinetic viewing experience of the Processional Route would therefore be unchanged as a result of the proposal.

Cannon Street views:

348. Views of the Cathedral are highly prominent from Cannon Street. In this long axial approach from the east, fine and clear views emerge of the South Transept Portico, Apostles and Western Towers against clear sky, in addition to the south-west tower, south elevation and dome.
349. Extensive views testing has been undertaken from multiple locations along Cannon Steet to assess the impact of the proposal on the Cathedral. As illustrated within View 15 and 15N of the THIVA, the scale of effect arising from the proposed development would be negligible, since it would be almost entirely concealed from view by the implemented scheme at 120 Fleet Street, with visibly limited to a 'technical degree' – the line thickness of the wireline - in regard to the roofline. This means that at this distance, even with magnification, the proposal would be imperceptible to the human eye. As such, the proposal would not harm the setting or significance of the Cathedral in this viewing experience.

St Paul's Cathedral - Views From the Golden Gallery:

350. From the Golden Gallery of St Paul's Cathedral, the proposal would be almost entirely screened by the implemented scheme at 120 Fleet Street, with slivers of the top floor roof pavilions coming into view beyond 120 Fleet street. As such, it would preserve the composition and character of these views, not

detract from the general open prospect of the viewing experience, and would pay special attention to the roofscape, in accordance with the Protected Views SPD.

Other publicly accessible elevated viewing areas - Views from:

Tate Modern:

351. From this viewing location, the development would be visible alongside other tall buildings within the New Street Square area at a significant distance to the west of St Pauls Cathedral. The proposed developed would be largely screened by Peterborough Court, such that only the layered top floors of on the southern elevation and the central sweeping volume would be visible. Alongside the other buildings within the cluster, the development would contribute to the varied skyline. It is considered the character and composition of the viewing experience here would be preserved and enhanced.

One New Change:

352. From the public roof terrace, the proposal would entirely screened from view behind the consented, and implemented, 120 Fleet Street, and as such would have no impact on the essential character and compositional qualities of this view, thereby ensuring it would be preserved and enhanced.

120 Fenchurch Street Public Garden:

353. Viewed from the western terrace, the proposal would be predominately screened from view behind the consented, and implemented, 120 Fleet Street. Only slight glimpses of the rooftop pavilions, and the north eastern corner elevation would be visible beyond 120 Fleet Street, however these minor viewing experiences would not be seen against the dome of St Pauls or its lantern, and therefore would not result in any harm to the setting and significance of the heritage asset.

City Landmarks and Skyline Features

354. The proposal would not affect views of the majority of City landmarks and skyline features in accordance with CS 13 (2). Only two would potentially be affected by the proposals, as below:

St Andrew Holborn and the City Temple

355. These would have a visual relationship with the proposal in views from Charterhouse Street (view 24). On the right-hand side of this this view, and to

the right of St Andrews Church, the proposal would form part of the layered backdrop predominantly obscured by mid-rise commercial buildings in the midground, notably 6 and 1 New Street Square, which the proposal would sit behind. Officers consider that the degree of encroachment into the background of this view would be minimal, with the additional height of the proposal aligning with the midpoint of the central bay of the tower of St Andrew. City Temple would be to the left-hand side of the view and unaffected by the proposals.

356. As such, the experience of St Andrew as a skyline feature would be unchallenged by the proposals and preserved in accordance with the guidance within the SPD. Further assessment of the indirect impact of the proposals on these two listed buildings is found below.

Other Borough Strategic Views

WCC Draft Metropolitan Views SPD

357. Adopted Westminster City Plan 2019-2040 Policy 40(F) (Townscape and Architecture) states that new development affecting strategic and local views (including views of metropolitan importance) will contribute positively to their characteristics, composition and significance and will remedy past damage to these views where possible. Whilst in draft, the Metropolitan Views SPD (2007) is understood to contain those local metropolitan views. Of the 45 identified, the proposal would be prominent from only V18 – Churches of St Clement Danes and St Mary-Le-Strand.

358. The Metropolitan Views SPD describes how both churches dominate eastern views along the Strand, from where the two towers make a 'delightful and lasting impression'. The SPD identifies a broad viewing experience zone and viewing cone from the southern pavement east of Exeter Street, which extends east/north East into the City of London. Extensive views testing has been undertaken to assess the impact of the proposal on the viewing experience identified in the SPD. View 17 of the townscape heritage and visual impact assessment represents the viewing experience most representative of the SPD description, with the sequence and composition of both towers legible and encircled by sky. In this view, both towers remain clearly legible, with only a fleeting glimpse of the proposal coming into view in the distant background. The visibility would be limited to the top two floors of the building, behind the pitched tourelle roof of the Royal Courts of Justice.

359. View 18, taken in winter, represents the most sensitive view to change as a result of the proposals. In this view, the proposal would infill the sky space to the south of St Clement Danes and be read receding away from the church's southern shoulder, as part of the distant background. The massing has been

carefully designed to step down in height to the south-west in a series of landscaped terraces, and its southwestern elevation given a sculpted curved form to break down its overall massing into a series of forms, adding interest and texture to the background of the view. This is reinforced through the architectural design, which defines the central 'sweep' with cream-coloured fins, visually dividing the south-west elevation into vertical elements.

360. Overall, it is considered that these prominent focal landmarks in this view would remain visible and appreciable in accordance with the draft guidance. The indirect impacts on the settings of the two churches as listed buildings is discussed further below.

London Borough of Camden:

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

London Borough of Hackney:

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

Conclusion on Strategic Views

363. The proposal has been sited amongst an established nucleus of tall buildings around New Street Square which is an emerging Cluster (Holborn and Fleet Valley) in the draft City Plan 2040, seeking to consolidate strategic growth in areas with the least impact on pan-London and strategic views.

364. The proposal would preserve the characteristics and compositions of all relevant LVMF and other strategic pan-London views.

365. It was also sited and designed to preserve strategic views of and from the Monument and of the setting and backdrop to St Paul's Cathedral, especially from Cannon Street. It would preserve neighbouring borough views and would preserve views of relevant City Landmarks and Skyline Features. It would also preserve the experience from existing and emerging elevated public spaces which are also important to the character of the City.

366. Following rigorous assessment, officers consider that the proposal would preserve all relevant strategic views in accordance with City Plan policy CS13, emerging City Plan 2040 policy S13, London Plan Policy HC3 and HC4 and associated guidance in the LVMF SPG and Protected View SPD.

Heritage

Designated Heritage Assets - Direct Impact

367. The building is not listed or located within a Conservation Area. The proposals would therefore not result in a direct impact on any heritage asset.

Non-Designated Heritage Asset (NDHA)

368. As part of the consultation process the Twentieth Century Society have raised an objection to the proposed demolition of the building, and suggest Hill House should be considered a non-designated heritage asset (NDHA).

369. A detailed assessment of the architectural and historic interest of the existing building on the Site was undertaken to inform the proposed redevelopment of the Site and as part of an application for the Certificate of Immunity from Listing (COI). A COI was granted for Hill House on 20th October 2023 by Historic England, confirming that the existing building is not of special architectural or historic interest to meet the criteria for statutory listing.

370. Following this, the existing building has been assessed against the criteria Historic England have suggested for selecting non-designated heritage assets, contained in 'Local Listing: Identifying and Conserving Local Heritage Advice Note 7'. The criteria comprise: assets type; age; rarity; architectural and artistic interest; group value; archaeological interest; historic interest; and landmark status. The assessment is summarised below.

371. In terms of asset type, age, rarity and architectural interest, as a purpose built commercial building in the late 1970s, Hill House is one of a number of buildings of this type, and is not considered to be of any intrinsic design or architectural merit. Furthermore, with the extensive redevelopment of the immediate surroundings, it relates poorly to and holds no group value with any of the neighbouring buildings, and it is not considered to relate positively to the Fleet Street Conservation Area to the south of the Site. It also holds no archaeological interest of past human activity, and little intrinsic historical interest owing to its relatively recent construction and the absence of any notable associations. Finally, as a result of its somewhat squat appearance and back-street location, officers conclude that the building does not possess landmark status.

372. Overall, Hill House is considered to have no architectural and historic value and fails to satisfy the HE criteria for non-designated heritage asset status.

Designated Heritage Assets - Indirect Impact

St Pauls Cathedral (Grade I)

Heritage Significance

373. London's and one of the Nation's most famous landmarks, it was London's first Cathedral and one of the earliest sites of Christian worship in Britain, now identified as one of London's two Strategically Important Landmarks, being also the seat of the Bishop of London, the mother Cathedral of the national and international Anglican Church, a ceremonial centre and backdrop of Royal and State ritual and pomp and the final resting place of figures central to the national story, a place of national commemoration and celebration. It is the masterpiece of seminal national figure and architect Sir Christopher Wren (with input from other notable designers and craftspeople over time) and of the distinct English Baroque-style. It was central to the adoption of classical architecture in Britain, and symbolic of the restoration of London post Great Fire as a major European political, cultural and economic capital.
374. It is of outstanding national and even international heritage significance. That significance is architectural, historic, artistic, archaeological, evidential and communal (social, commemorative, spiritual and symbolic). This significance is inherent in the iconic architectural form and composition, and in its plan form, fabric and those memorialising fixtures comprising statuette to mausoleums.

Contribution of Setting

375. In terms of setting, for hundreds of years it was the tallest building in London. It was strategically sited atop Ludgate Hill, a rare topographical moment in the City of London and one of its highest points, with a commanding position overlooking the River Thames. Following the Great Rebuilding Act (1667), Wren had little influence over even the immediate, never mind wider, setting. This setting has substantially been altered over time, often with the setting of the Cathedral at its heart, and to various degrees those elements together make a substantial contribution to significance and an appreciate of it, in particular the architectural, artistic, historic and communal significance. Those contributing elements of significance are deemed, in descending order of importance:
- Those wider strategic pan-London riparian views from the Thames, its embankments and bridges which are often iconic and London defining, and where St Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches. These make a substantial contribution to significance and an appreciation of it.

- The ancient processional route of Royal and State national significance along the Strand/Fleet Street, a 'national spine' of pomp and parade, of celebration and contemplation, along a route between the heart of Government in Westminster and commerce in the City, where St Paul's is the pre-eminent culmination/destination of a picturesque sequential townscape experience at the heart of London's and the Nation's identity. This makes a substantial contribution to significance and an appreciation of it.
- Those wider pan-London views and approaches where the dome offers a skyline presence in broad identity-defining London panoramas, for example from those strategic views identified in the LVMF, including Parliament Hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others, some of which are subject to local designations. This include old and newer high level appreciations of the London skyline which allow the Cathedral to be better understood as part of London's wider natural and cultural topography, including from the Monument and higher level public viewing galleries such as the Sky Garden at 20 Fenchurch Street, One New Change and emerging viewing terraces in the City Cluster. These make a significant to moderate contribution to significance and an appreciation of it.
- Those more immediate, often incidental, some more planned, townscape appreciations, which have resulted ad-hoc and some active townscape curation over the generations, in particular from St Peter's Walk (south transept axis), Cannon Street, the Paternoster Square development, amongst others, where the Cathedral soars above and dominates its immediate surrounding as the defining skyline presence. This make a moderate/significant contribution to significance and an appreciation of it.

Impact

376. In terms of the wider riparian setting (setting element 1), from the river, its embankments and bridges, the proposal would in no instance challenge the pre-eminence of St Paul's on the skyline, being of an appropriate scale and set away from it. It would also not obscure or detract from a landmark which contributes to the setting of St Paul's in these views. These impacts are covered in detail under the relevant strategic LVMF views at paragraphs 137 – 174. It is considered the wider riparian setting in pan-London views would be preserved.

377. In terms of the Procession Route (setting element 2), by virtue of the proposals location a significant distance north of Fleet Street, at no point would it obscure or detract from the pre-eminence of the unfolding composition or on the skyline presence of the Cathedral this kinetic viewing experience. This element of setting and its contribution to significance would be preserved.
378. The proposal would be a little more evident in those wider pan-London (higher level) experiences of St Paul's (setting element 3) and the more locally strategic townscape setting (setting element 4). This would manifest in views from the Cannon Street approach, from the Monument Viewing Gallery and from the Sky Garden at 20 Fenchurch Street.
379. In views from Cannon Street, the proposal would be fully screened from view behind the silhouette of the implemented scheme at 120 Fleet Street, and as such would not result in any additional impact on the setting of the Cathedral in this important approach. In terms of those pan-London views (setting element 3), the proposal would not undermine an appreciation of St Paul's strategic wider skyline setting from London's broad cityscape panoramas, as discussed in the section above. Equally, from the Monument Viewing Gallery, the proposal is not considered to result in any further erosion of the sky silhouette of the Cathedral in views west.
380. The proposal would not be visible in townscape views around the close setting of the Cathedral.

St Paul's Conclusion of Impact

381. The proposal would preserve the significance and setting of St Paul's from those identified local townscape views and higher-level pan-London views - elements of setting which make a moderate to significant contribution to heritage significance. Overall, the proposal would preserve the setting and significance of St Pauls Cathedral and the ability to appreciate it.

St Brides Church (grade I)

Heritage Significance:

382. Church of 1671-8 by Sir Christopher Wren with spire of 1701-3, one of Wren's tallest and comprising five octagonal stages of diminishing height. The spire is one of the most distinctive and memorable on the city's skyline, appreciated from within and outside of Fleet Street Conservation Area. The skyline presence when viewed from the bridges and banks of the Thames makes a significant contribution to significance, especially where the spire can be seen as part of the romantic historic skyline around the Temples to Blackfriars and

in association with St Paul's. The church was gutted in the Blitz and restored by Godfrey Allen in 1957. The associated excavations by Professor Grimes in 1952-3 comprised the first complete archaeological investigation in England of a parish church. They revealed that the site of the church had been in use since the Roman period.

383. It is of outstanding national architectural/aesthetic, artistic, historical, archaeological and to a lesser extent communal significance.

Contribution of Setting:

384. Elements of setting make a significant contribution to architectural and historic significance, in particular an appreciation of it. In relative order of contribution, it is considered that this derives from:

- Pan-London broad riparian views from the River Thames, its embankments and bridges, including strategic LVMF River Prospect views from Waterloo Bridge, Gabriel's Wharf, Hungerford Bridge Southwark Bridge and London Bridge, where it can be appreciated as a landmark steeple atop the rising banks of the Thames, denoting the processional route and seen in complementary juxtaposition with Wren's masterpiece, St Paul's. These make a significant contribution to architectural/aesthetic and historical significance.
- Local, often glimpsed, sudden and fleeting local views from Fleet Street, St Bride's Avenue, Bride's Passage and Bride Lane allow for the full force of Wren tower and steeple to be appreciated in an intimate townscape context. This makes a moderate contribution to architectural and historic significance, especially an appreciation of it.
- The local topography and change in levels which allow for an appreciation of the burial site and it marking a climb from the riverside making a modest contribution to architectural/aesthetic, historical and archaeological significance.

Impact:

385. At no point would the proposals interface and obscure an appreciation of the distinctive steeple in those designated strategic LVMF River Prospects. Similarly in kinetic views from the South Bank, there would be no direct interface with St Bride's. Sitting behind Peterborough Court, and extending in this view to a similar height as 120 Fleet Street, the proposal would nestle into

a secondary townscape layer of tall commercial buildings, preserving the silhouette of the distinctive steeple on the skyline.

386. Overall, the proposal would preserve the setting and significance of St Bride's Church and the ability to appreciate it.

Church of St Andrew Holborn (grade I)

Heritage Significance:

387. Church, formerly mid-fifteenth century, ruinous and dilapidated by the time of the Great Fire which it escaped. Nevertheless, it was rebuilt to the design of Sir Christopher Wren in 1686-7, preserving the fifteenth century tower which Wren refaced in 1703-4. The building was damaged by bombing in the Blitz and restored by Seeley and Paget. As well as these architects, the church has associations with a number of important historical figures such as former Prime Minister Benjamin Disraeli, who was baptised there in 1817, and James Somerset, the former enslaved African who was central to the significant legal ruling in 1772 that slavery lacked a firm foundation in English law.

388. Archaeological excavation has revealed evidence for Roman use of the site and a timber church is documented on the site in 959.

389. It is of outstanding national architectural/aesthetic, artistic, historical, archaeological and to a lesser extent communal significance.

Contribution of Setting:

390. Elements of setting make a significant contribution to the architectural/aesthetic, artistic and historic significance. In relative order of contribution, it is considered that this derives from:

- Neighbouring historic buildings including Holborn Viaduct, Shoe Lane Bridge and the City Temple (the latter grade II listed) and S.S. Teulon's grade II listed Court House, Rectory and Vestry Clerk's complex of 1868-71. These close elements of setting form a group and make a high contribution to the significance of the church.
- To the north, the tranche of historic townscape in the London Borough of Camden, comprising Hatton Garden and Ely Place, makes a medium contribution to the significance of the church.
- Otherwise, the setting of the church, particularly to the south east and south, is now characterised by large office developments which make no contribution to significance.

Impact:

391. The proposal would affect the wider, neutral setting of the church to the south. In short views from Charterhouse Street the top of the proposed development would appear on the skyline above the existing modern buildings to the southwest of the Church, in particular 1 New Street Square. The extent of visibility above these is modest. The wider southern setting of the Church is characterised by large footprint and tall commercial developments, with glass and metal framed elevations, with which the proposal would have an affinity and would be read, distinct from the church and the group of historic buildings in the foreground. In longer views from the north, from Hatton Garden, there would be no interface between the church and the proposal. Overall, the historic form of the church would continue to be clearly legible against a backdrop of modern architecture.
392. As such, the proposals would preserve the significance and setting of St Andrew Holborn and the ability to appreciate it.

Church of St Dunstan in the West (grade I)

Heritage Significance:

393. Church dating from 1830-3 by John Shaw senior and has a Ketton stone Gothic tower in the Gothic style and is surmounted by an octagonal stone lantern. Occupying the site of a church first attested in c.1170, the building incorporates monuments from the earlier church and statues and masonry from the nearby Ludgate, demolished in 1760 for road widening, including of Queen Elizabeth (c.1586) and King Lud and his Sons. The church's date, architectural form and surviving monuments are rare in a City context. So too is the octagonal lantern with its delicate Gothic tracery. This is a significant presence on the local Fleet Street skyline when viewed from east and west – forming part of the Processional Route from St Paul's Cathedral to Westminster Abbey – and it is identified in the Protected Views SPD as a City church considered to have presence on the wider skyline.
394. It is of outstanding national architectural/aesthetic, artistic, historic and to a lesser extent communal significance.

Contribution of Setting:

395. Elements of setting make a significant contribution to the architectural and historic significance. In relative order of contribution, it is considered that this derives from:

- Views on approach from the West, from the Strand, and from the east, along Ludgate Hill, Ludgate Circus and Fleet Street. St Dunstan's, with St Brides and the Royal Courts of Justice are key connected landmarks and their lofty spires are prominent above the varied eclectic Fleet Street townscape experienced along Fleet Street as well as from the River. This wider setting with other landmarks contributes to their overall architectural and historic significance. This makes a significant contribution to significance.
- Pan-London riparian views from the South Bank Queen's Walk which it contributes to that wider historic setting of the Temples and Fleet Street making a moderate contribution to significance.
- Fleeting glimpses in the courts and alleys north of Fleet Street making a modest contribution to significance.

Impact:

396. The proposed development will not be visible in relation to the Church of St Dunstan in the West, in local townscape settings, visibility being occluded by the existing intervening townscape and the curve of Fleet Street.
397. Overall, the proposals would preserve the setting and significance of the church and the ability to appreciate it.

Church of St Clement Dane (grade I)

Heritage Significance:

398. Church of 1680-82 by Sir Christopher Wren, reusing but refacing fifteenth century masonry of the west tower, with a spire of 1719 by James Gibbs. The building is therefore a work of two of the outstanding architects of the age. It was heavily damaged by bombing in World War Two and restored by W A S Lloyd in 1955. Upon re-consecration the church became the Central Church of the Royal Air Force. It is of Portland Stone in Wren's characteristic English Baroque manner, with an elegant steeple with a skyline presence. Restored interior with broad tunnel vault, galleries and groin vaulted aisles, the latter, uniquely in a Wren church, being continued as ambulatory round east end with further semi-domed apse added.
399. It is of outstanding architectural, artistic, historic and archaeological heritage significance, on the whole contained in the external and internal physical fabric, but with a substantial contribution from setting.

Contribution of Setting:

400. Elements of setting make a substantial contribution to the architectural and historic significance. In relative order of contribution, it is considered that this derives from:

- An important architectural and historic landmark on the Processional Route with a prominent central position on the Strand, where it is appreciated as an important part of the 'pomp' and ceremony of this route with a skyline presence. This makes a substantial contribution to significance and an appreciation of it.
- Wider pan-London riparian skyline views from as far west as Westminster Bridge and also from the South Bank and Waterloo Bridge. These make a significant contribution to significance and an appreciation of it as part of central London's historic skyline.

Impact:

401. In longer views from the west along the Strand, where it is experienced serially with St Mary Le Strand, the proposal would provide a subtle and layered backdrop to the background setting of the church.

402. Historic England and City of Westminster Council have identified harm to the significance of Church of St Clement Danes, by virtue of the proposal infilling the skygap between it and the implemented scheme at 120 Fleet Street in views eastward along the Strand, which would create a continuous built backdrop in these views. Officers acknowledge this conclusion but disagree as to the impact.

403. While officers acknowledge the proposal would fill in the sky gap in longer views on approach from the west along the Processional Route of the Strand, and appear fleetingly behind the spire in some views from the central reservation, its form and massing is not considered to challenge or undermine the principal architectural features of the church, namely its ornate tower and steeple which would still be read clearly. In both long and short views, the proposal would be heavily screened by the large mature trees which line this route, such that even when not leaf, the skygap would be largely obstructed in these views.

404. The total height of the development would only marginally, and momentarily, surpass the horizontal datum of the top stage of the steeple, and the massing would sweep away from the church having been broken down into a series of smaller elements. The elevations have been carefully detailed to be visually

recessive and provide vertical texture, to distinguish the two buildings from each other, and ensure the Portland stone of the church spire would remain prominent on the skyline in views along the Strand.

405. At closer range, due to the curvature of the road, the development would fall behind and be screened by buildings on the north of Fleet Street, such that it would have extremely limited intervisibility with the Church, demonstrating that the level of impact is fleeting and quickly diminishing in the kinetic sequence moving east.
406. The steeple's skyline presence in those wider pan-London riparian strategic views from the river, its embankments and relevant bridges, the second element of setting contributing to significance, would be preserved. At no point would the steeple be obscured, or detracted from, by a proposal set at some distance from it in these views.
407. Overall, the proposal would preserve the setting and significance of St Clement Dane and the ability to appreciate it.

Church of St Mary Le-Strand (grade I)

Heritage Significance:

408. Church, of 1714-17, by renowned Georgian architect and landscape designer, James Gibbs, thought to reflect his experience in Rome, whilst paying tribute to Wren. It is of Portland Stone and is symmetrically composed with a tower and steeple rising in 3 diminishing open stages with aedicules in elegant Corinthian order and distinctive Wren-like flaming urns. It has a main west front, exceptionally situated on a central island commanding the vista west along the Processional Route of Royal and State significance, and an important part of an unfolding, sequential townscape setting of rare London formality, but in the English Picturesque tradition.
409. Aisleless interior with the apse framed by superimposed orders of coupled columns and coupled columns carrying balcony over west door. Panelled walls with pilasters to upper register and coffered ceiling.
410. It is of outstanding architectural, historic, artistic and archaeological heritage significance, on the main contained in the physical fabric of the exterior and interior, but with a substantial contribution from setting.

Contribution of Setting:

411. Elements of setting make a substantial contribution to the architectural and historic significance. In relative order of contribution, it is considered that this derives from:

- An important architectural and historic landmark on the Processional Route with a prominent central position on the Strand, where it is appreciated as an important part of the 'pomp' and ceremony of this route with a skyline presence. This makes a substantial contribution to significance and an appreciation of it.
- More limited glimpses the steeple from Waterloo Bridge and the Queen's Walk, in particular where this is seen in complementary architectural juxtaposition with Somerset House in the foreground. This make a moderate contribution to significance and an appreciation of it.

Impact:

412. Historic England and City of Westminster Council have identified harm to this church. However, as with Church of St Clement Dane, the proposal would have a transient impact on the kinetic approach towards the church from the northern pavement of the Strand resulting in a transient, even fleeting, appearance of the proposal below the shoulder height of the church.

413. It would appear at some distance as a backdrop feature to the church, which would remain preeminent in the foreground. It would be read in context of the unfolding layers of monumental institutions of state and commerce which characterise the viewing experience of the Processional Route, where there is interactions of the steeple with other skyline features such as the Deloitte Building (New Street Square) and the Royal Courts of Justice. At no point would it challenge the steeple silhouette. As such, it is considered that this principal contributing element of setting to significance would be preserved.

414. Those more limited glimpses of the steeple, including in association with Somerset House, from the River, Waterloo Bridge and the South Bank, would not be obscured or detracted from, preserving this element of settings contribution to significance.

415. Overall, the proposal would preserve the setting and significance of St Mary Le Strand and the ability to appreciate it.

Royal Courts of Justice - Grade I

Heritage Significance:

416. National courtroom buildings of 1874-1883, designed by George Edmund Street and finished by Arthur E. Street and Sir Arthur Blomfield. High Victorian Gothic Revival design, combining 13th century English and French architectural styles. Principally in Portland stone ashlar with red bricks and granite, marble, and red sandstone dressings. Slate roof. Widespread usage of ironwork, both structural and decorative.
417. The building is four to five storeys and arranged across two principal blocks, all the functions arranged around a central, rectangular hall. The list description notes: 'the lengthy southern front facing the Strand is divided into several distinct parts and repeated motifs help to tie together the design into a unified whole...Although there is an element of calculated asymmetry to the overall design, there are symmetrical or near-symmetrical groupings. The most striking is that which identifies the principal courtroom block and the entrance to the central hall which is gradually stepped back from the street line.(List Entry Number: 1264258).
418. The building is of very high architectural interest, 'with a considerable presence at the heart of London and the centre of the legal district occupied by the Inns of Court; it is generally considered to be the foremost work of George Edmund Street, one of Victorian England's principal architects; its meticulous planning is accompanied by considerable inventiveness in designing numerous different interiors including courtrooms, corridors, staircases, libraries and the large and impressive central hall, all of which retain the majority of their original fittings. Historic interest: the building is a celebration of the reform of the legal system in C19 England, by a raft of legislation which aligned the processes of Equity and Common Law to create a fairer system of justice. Group value: with numerous listed buildings on the Strand and Carey Street, notably the Church of St Clement Danes, Strand (Grade I)'(List Entry Number: 1264258).
419. It is of outstanding national architectural/aesthetic, artistic, historical, and to a lesser extent, communal significance.

Setting:

420. The setting of the Royal Courts of Justice is largely informed by its environs on the Strand, with the main entrance to the buildings being from the south. The buildings are within the Strand Conservation Area. There is an element of group value with the other landmark historic buildings on the Strand, in

particular the two churches – St Clement Danes and St Mary-le-Strand, which form a group, in views along east to west and vice versa; and to a lesser extent, the Church of St Dunstan in the West. The listed building's heritage significance and landmark quality is best appreciated, however, in close views from The Strand. The scale of the Courts is similar to that of the Aldwych buildings which inform the close setting to the west. The overall setting has a strong group value of a late 19th and early 20th-century civic nature. The wider setting of the Royal Courts is already informed by several architecturally contrasting, more modern buildings of a greater height.

421. There is currently no visual or historic relationship with the Site. Existing tall buildings located in proximity to the Site, in particular 6 New Street Square, are visible in longer distance views of a small part of the roofline of the Royal Courts from the west.

Impact:

422. The listed building is best appreciated in close views from the Strand where visibility of the proposal will be negligible. It would however be visible in the wider setting of the Royal Courts of Justice, as shown in View 20, where it will be visible as a negligible and distant addition to the background skyline. It would also be visible in the backdrop of a small part of the roofline of the Royal Courts which is visible in views from the Strand (View 17, 19 and A17). In these views the churches on the Strand form the primary focal landmarks, with a strong skyline presence, whereas the Royal Courts are less prominent, and largely obscured by the Church of St Clement Danes.

423. Taller buildings to the east, in particular 6 New Street Square and the emerging 120 Fleet Street, are already glimpsed in some views beyond the roofline of the Royal Courts. The proposal would introduce a new building of a similar scale to these tall buildings which characterise the commercial, 21st-century character of the wider eastern setting of the Royal Courts. However, intervisibility between the two would be minimal, and would not impact the ability to appreciate the heritage significance of the Royal Courts.

424. Overall, the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

Former Public Record Office (grade II*)

Heritage Significance:

425. The Public Record Office was built in 1891-1896 to designs by Sir John Taylor. This building was an extension to an earlier building to the east on Fetter Lane,

1853-5 by Sir James Pennethorne. The Taylor addition to this building, incorporated a 13th century archway of the former Rolls Chapel. The Pennethorne building is in Bath stone, with ashlar dressings and lead roofs. Taylor's extension is in Portland stone, also with ashlar dressings. The earlier building is of interest for its fireproof construction, with individual modular document cells of wrought iron within shallow arched brick vaults with cast iron girders. Both elevations are examples of a Perpendicular Gothic style. The frontage on Chancery Lane is symmetrical, either side of a central archway. It was the Public Record Office until 2003, today the building is a library for King's College London. The building is of high architectural and historic interest.

Setting:

426. The principal element of setting for The Public Record Office is informed by its prominent position on Chancery Lane and Fetter Lane, where it is viewed as a the pre-emanant building in the townscape. The significance of The Public Record Office is best appreciated in views on approach from the east and west, and from the interior of its southern courtyard garden, where it can be experienced largely in isolation from its surrounding townscape. The close setting to the north and east is informed by large commercial buildings, with the Rolls Building to the north, and the taller modern New Street Square buildings to the east, which make a neutral contribution to significance.

Impact:

427. The proposal would be slightly visible looking eastwards when emerging from the western archway. In this oblique viewing experience of the Public Records Office, the proposal may be glimpsed beyond the intervening tall buildings which define the western edge of New Fetter Lane/Fetter Lane. However, considering the alignment of West Harding Street; the screening of the two tall buildings which it is flanked by; and the distance Hill House would be set behind these buildings, glimpses of the proposal would be oblique, fleeting and dissociated with the listed building. Due to this high level of screening, changes to this setting would be negligible.

428. As such, the proposal would preserve the setting and significance of the listed building.

Kings Bench Walk Group – 1, 2, 3, 4, 5, 6 and 7 Kings Bench Walk (grade I), 3 and 8 North Kings Bench Walk (grade II*), and 9-11 Kings Bench Walk (grade II)

Heritage Significance:

429. These are a highly significant terrace of buildings within Temples Conservation Area. They are part of a terrace that defines the east side of Kings Bench Walk, and were built as chambers in the late 17th century. They are one of the most complete groups of buildings of that date in London and have high aesthetic, architectural and historic significance. Although there is a variety in the width, height and roofs, they have a strong visual unity and uniformity of appearance with a raised ground floor, central and prominent doorcase, strong cornice line and brick parapet, hipped mansard roofs and a lower ground floor, constructed of dark red and brown bricks with red dressings. Their significance is derived from their special historic and architectural interest, and evidential values due to their date, design and building, as they were constructed for, and still in use as legal chambers. There is a distinctive wide York stone pavement to the front of the terrace with a border of Purbeck setts and mature Plane trees. Kings Bench Walk is an irregular oblong shape, now used for car parking, which has a gentle slope down to the River Thames. It is bordered on the west side by 1-5 Paper Buildings, Inner Temple Library and on the south side by Inner Temple Garden.

Setting:

430. The principal elements of setting contributing to the significance of these listed buildings are as follows:

- Each of these individually listed building forms a complementary element of setting with the other, making a significant contribution to significance.
- The neighbouring buildings and spaces within the Temples immediately to the west, including Nos. 1 & 2 Mitre Court Buildings, Paper Buildings, the Francis Taylor Building, and the Inner Library which complement them in aesthetic, style and scale, illustrate the development of the group and help to define the sense of intimacy and enclosure prevailing across the Temple. This makes a significant contribution to significance.
- The open, verdant setting of Inner Temple Garden and the open, riparian setting to the south, which contrast pleasingly with the framing buildings and which with them generate that singular sense of place which prevails across the Temple. This makes a significant contribution to significance.
- The open sky setting framing the group, in particular when there is limited influence of wider built development, accentuating the self-contained and

distinct integrity and authenticity of the ensemble. This makes a moderate contribution to significance.

Impact:

431. In long-range views from the south and west from within the Temple, the existing backdrop of this group, whilst largely of clear sky, is characterised by fleeting glimpses of existing modern buildings which hint at, but not intrusively so, the presence of the City beyond.
432. These buildings (existing and consented) are a range of distances from the Temples, but all are clearly detached from the close setting of the buildings and read as recessive, background elements which disappear in closer views of the listed buildings. The proposal would have a similar impact. Its upper levels would in places be visible above the roofline of the listed buildings, but it would be seen fleetingly with the other existing modern rooftops and would disappear from view in the closer views.
433. The careful sculpting of its south elevation, quiet materiality and façade detailing would all further soften the appearance of the proposal in these views. And in both views tested (view 21, looking across the gardens, and 22 looking across the car park at King Bench Walk) from within the Temple, the proposal would be heavily screened from view by mature tree cover, even when not in leaf, such that the development would be difficult to perceive.
434. As such, then, the proposal would form another layer in the backdrop already characteristic of this element of the setting of the listed buildings. The proposal would preserve the settings and significance of the listed buildings and the ability to appreciate it.

Nos. 1-4 and 5 Paper Buildings (grade II)

Heritage Significance:

435. Chambers of 1848. Nos. 1-4 are in a plain, classical design while No. 5, terminating the row to the south, is of a more striking Tudor style. The group embody the rich, dignified mix of styles and materials of the Temples, tied together by a consistent scale and dignified aesthetic. Accordingly, the buildings have high architectural and historic interest.

Setting:

436. The principal elements of setting contributing to the significance of these listed buildings are as follows:

- The neighbouring buildings and spaces within the Temples immediately to the west, north and east, including Nos. 1 & 2 Mitre Court Buildings, Paper Buildings, the Francis Taylor Building, the Inner Library, Harecourt Buildings and Temple Gardens which complement them in aesthetic, style and scale, illustrate the development of the group and help to define the sense of intimacy and enclosure prevailing across the Temple. This makes a significant contribution to significance.
- The open, verdant setting of Inner Temple Garden and the open, riparian setting to the south, which contrast pleasingly with the framing buildings and which with them generate that singular sense of place which prevails across the Temple. This makes a significant contribution to significance.
- The open sky setting framing the group, in particular when there is limited influence of wider built development, accentuating the self-contained and distinct integrity and authenticity of the ensemble. This makes a moderate contribution to significance.

Impact:

437. There would be background distant views of the development rising above the rooftops of the perimeter buildings, where the top quarter (approximately) of the development would be visible. While the well-preserved roofline which is predominantly experienced with a clear sky backdrop, officers do not consider that the proposal would unduly challenge this way of appreciating the buildings. The development would be experienced as a high-quality architectural addition to the background skyline, with a tangible sense of separation between it and the listed buildings. Furthermore, the extent of intervisibility is limited to the western edge of the gardens. The proposal would consequently fall out of view for the majority of vantage points, and therefore preserve the overarching, significant qualities of the setting of the listed buildings.

438. The proposal would preserve the setting and significance of these listed buildings and the ability to appreciate it.

Inner Temple Garden (grade II Registered Historic Park and Garden)

Heritage Significance:

439. Inner Temple Garden and Middle Temple Garden have a medieval origin and evolved from the 16th – 20th centuries and play an important role in defining the character of the Temples. The gardens are the largest private green space in the City of London and include mature trees, shrubs, considered planting, statuary and retain a quiet domestic character and are important for the setting of surrounding listed buildings. The area is defined by its legal professions

which have evolved over centuries and continues to exist here. In brief, the significance of the Registered Historic Park and Garden is derived from successive landscape layouts, varied planting and lawned areas, and its domestic gated quiet character representing historic and architectural values.

Setting:

440. The principal elements of setting contributing to the significance of this RHPG are the arcadian but planned character of the registered landscape, in addition to its connection to the open setting of the River. Of equal contribution, by virtue of its juxtaposition, is the sense of enclosure derived from the cloister of buildings which consistently define its edges. The tranquillity afforded by this landscape also contributes to its experiential quality as rare sanctuary within inner London, which also contributes to its significance.

Impact:

441. The potential impact on development has been assessed from the footpath in the southwestern corner of the gardens. There would be glimpsed slivers of the building rising above the foreground buildings of 1-5 Kings Bench Walk but this would be discreet and largely experienced between trees from incidental locations. The proposal however would be the largest built development to rise above the roof line of 3-6 King Bench Walk, where its massing would be read rising up from the roofline at the northern end of the terrace. However, the development would be experienced at some distance away from the close intimate setting of the terraces and garden, and as the appendix photography demonstrates, views of the development would be limited to glimpses from more central aspects within the gardens. Officers consider that the development would not challenge or dominate the foreground or background or alter the special, intimate, and tranquil, character of the designated heritage asset.

442. There would be no harm to the wider setting or significance of the registered park and garden and its heritage values would be preserved.

Dr Johnson's House (grade I) and No. 5 Pemberton Row (grade II)

Heritage Significance:

Dr Johnson's House

443. Late 17th century house, altered in the 18th century and rescued and restored in 1911-1912 by Alfred Burr who opened it as a museum. A 3-storey building with a basement and an attic; red brick with rubbed brick window surrounds and platbands. Restored flush sash windows and a c.1775 front door with fanlight above. Notably rented by the writer Dr Johnson from 1748 to 1759,

who compiled his famous Dictionary in the attic of the house. Damaged during WWII but repaired and a new roof added.

444. The building has high architectural interest as an example of a substantial late C17 house in the City of London with remarkably well-preserved interiors. It has significant historic interest for the connection with Dr Johnson who compiled his Dictionary in this house, and for the further historic connections to his servant Francis Barber.

5 Pemberton Row

445. 5 Pemberton Row is a late 17th/early 18th century house of three storeys, with a basement and attic, which has been much renovated. The ground floor is stuccoed, with altered fenestration, although in keeping box sashes across the front elevation; with a red tiled mansard roof behind a parapet with dormers. It holds architectural and historic interest as a late 17th/early 18th century house in the City, albeit much renovated.

Setting:

446. The setting of Dr Johnson's House is primarily informed by its location at the west end of Gough Square which is a surviving element of the historic townscape network of squares and alleys to the north of Fleet Street. Gough Square forms an intimate and close setting which enhances the ability to appreciate the character and aesthetic value of the late 17th century house within its historical urban setting. The close setting of Dr Johnson's House within the square, and intimate character of the space, is best appreciated in the view westwards towards Dr Johnson's House from within Gough Square. This close setting of Gough Square is the principal element of setting which contributes to significance.
447. The rear of the house, which addresses Pemberton Row alongside No.5, is appreciated within the wider setting to Gough Square which is informed by much larger-scale, commercial buildings to the north and east; Peterborough Court is clearly visible in the backdrop of 9 Gough Square at the eastern end. 120 Fleet Street (currently under construction and part of the Future Baseline) will also be visible in views east from the Square, and from Pemberton Row. In this viewing experience, the secondary, north, elevation of Dr Johnson's House forms a group with the other brickwork elevations, including No. 5, of similar scale and character; these elements of close setting make a modest contribution to the significance of the two listed buildings. Otherwise, the viewing experience is of the contrast between a portion of the low-rise, historic City and the wider, modern City beyond. This aspect of setting makes a neutral contribution to significance.

Impact:

448. The proposal would not be visible in key views of Dr Johnson's House from Gough Square.
449. In views looking east from Pemberton Row, and from within Gough Square (away from Dr Johnson's House), the proposal would be visible, and of a consistent scale with the existing, and emerging, tall modern commercial buildings to the north and east - Peterborough Court and 120 Fleet Street. However, the presence of the proposal on the skyline would not be unduly dominating, and would preserve the contrast between the modern City buildings in the background and the close and intimate character of the ensemble in the foreground.
450. Furthermore, the proposal would form a high-quality architectural addition to the background skyline within the setting of these buildings, as it directly responds to the smaller scale of the context with the massing falling away in the south-western corner, and the architectural expression emphasising layering through roof terraces which would be softened though extensive soft landscaping.
451. Overall, the proposal would preserve the settings and significance of the two listed buildings and the ability to appreciate it.

Wine Office Court Group – (Nos 1-3 and 7, grade II)

Heritage Significance:

452. Victorian offices built from 1868-1870 by John S. Lee for Robert Burt and Company, a printing company; initially until 1892 the first quarters of the Press Association. Stock brick building over four storeys, with a three bay plan although a narrower central bay and round headed arches above entrance. All windows sashes with glazing bars. Lower floors with tripartite windows separated by barley-sugar columns with tiny ionic capitals.
453. Historical interest for the association with the Press Association, the link with which inspired the development of Fleet Street as the historic centre of the British newspaper industry. Further architectural interest and aesthetic value as a mid-19th century office building.

Setting:

454. The immediate neighbours of 7 Wine Office Court are large-scale modern office buildings dating from the 20th century onwards. The element of its setting which bears relevance to its historic significance, and the ability to appreciate this significance, is its maintained location on Wine Office Court

and the character of this passageway as a narrow court/alley, typical of its historic form within the City. Although this passageway has altered, and Wine Office Court is now surrounded by more modern buildings and truncated from the more historically representative southern end to the route, this continued character does nonetheless allow for a historically representative view of the building in its location. There is also an element of group value with the buildings to the south, which are now separated by the open space which connects to Hind Court.

Impact:

455. This group of listed buildings all primarily address Wine Office Court (east). However, the proposed Development will be visible in views looking north along the Wine Office Court, where it would be experienced as an additional layer of modern commercial buildings, which truncate views north up the passageway. The fabric and character that defines the setting of these buildings, primarily a sense of compression and tightly enclosed streets, would be preserved. Local views south along Wine Office Court will be unaltered by the proposed development.
456. Furthermore, the massing of the building has been designed to respond to this smaller scale, stepping down in the southwestern corner, in addition to its elevations which would all feature terraces with high levels of, and high-quality, soft landscaping. The proposal would therefore add additional visual interest to this view north, and improve the skyline setting of the listed buildings.
457. There would be no harm to the wider setting or significance of these listed buildings.

Victoria Embankment group (Hamilton House; Telephone House; No.9 Carmelite Street; Sion Hall; City of London School; and Unilever House, grade II)

Heritage Significance

458. This dignified group of C19 buildings have strong architectural interest as a well-detailed and executed series of elevations in a variety of styles and employing a variety of materials to delightful effect; they have historic interest for their associations with their original occupants (a mix ranging from insurance firms to an ecclesiastical college to a school).

Setting:

459. They have strong group value (with the exception of Carmelite House) and together (also with the Temples and Blackfriars Bridge) form a picturesque

composition with the river. These two elements of setting make a substantial contribution to significance. Other elements make a neutral contribution.

Impact:

460. In views of the listed buildings from the South Bank, opposite, the tiered massing and richly articulated south façade of the proposal would form an unobtrusive background presence, read as a part of a recessive layer of existing modern development in the background of these views. The pre-eminence of the listed buildings within this setting would be unchallenged. Accordingly, the proposal would preserve the settings and significance of these listed buildings and the ability to appreciate it.

Conservation Areas

Fleet Street Conservation Area

Heritage Significance, Character and Appearance:

461. The character and appearance and heritage significance of the Fleet Street Conservation Area is summarised in detail in the Character Summary and Management Strategy SPD (2016), which is a material consideration. It summarises that core significance and character stem from:

- The focus of Fleet Street, a processional route between Westminster and St Paul's of Royal and State significance since the Middle Ages, and its ceremonial grandeur and commercial bustle created in particular by views of St Paul's Cathedral, St Dunstan's in the West and St Bride's, some of the City most notable ecclesiastical buildings.
- The evocative, fine grain network of historic streets, courts, lanes and alleys either side of Fleet Street, and their contrasting intimacy, and which have developed over hundreds of years once developed outside the City walls.
- The exceptional richness and variety of architecture of all ages and styles and the contrast between them, ranging from domestic Georgian to monumental 20th Century newspaper buildings.
- The long association with the press industry and other literary figures such as Dr Johnson and Oliver Goldsmith and of course medieval institutions, namely the Knights Templar, the Whitefriars, the Inns of Court and the legal sector.

462. The Conservation Area is of outstanding local and national architectural, artistic, historical and archaeological significance, drawn principally from the built form and fabric, and to a lesser but significant degree via setting.

Contribution of Setting:

463. Elements of setting make a significant contribution to significance, and views and vistas deemed integral to that significance are identified in the SPD. The main contribution comes via the below:

- Those approaches and views along the Processional Route, both east and west, towards the Strand and the Royal Courts of Justice to the west and St Paul's to the East (Note Views 1 and 2 in the SPD, for example). This makes a significant contribution to significance and an appreciation of it.
- Those sensitive strategic riparian broad prospects from the South Bank Queen's Walk which allow an appreciation of the wider skyline of the Conservation Area in a wider London context, in particular as a picturesque ensemble of national monuments and landmarks lining the Processional Route with a skyline presence to London's River. This makes a significant contribution to significance and an appreciation of it.

Impact:

464. Most of the Conservation Area's significance, character and appearance, would remain 'untouched' and undiluted, given its tight-knit urban grain and often intimate sense of enclosure, which limits the proposals visual influence over the majority of it.

465. In terms of those approaches east and west along the Processional Route (setting element 1), due to the location of the development to the north; the intervening development to the south; and the width to height ratio of Fleet Street, there would be no alteration to the experience of the route, and the townscape which defines its southern edge. Furthermore, it would not obscure or detract from a landmark/monument in either direction on this approach which complements the wider setting of the Conservation Area. Where the proposed development would be experienced from within the Conservation area, in particular within Gough Square and looking north along Wine office Court, the additional massing is not considered to dominate or overwhelm the Conservation Area, whose arresting enclosure and strong, coherent and rich historic context would remain pre-eminent and undiluted.

466. In terms of those wider riparian views from the South Bank (Queen's Walk), the proposal would, on the whole, not obscure, distract or detract from a some of those skyline features of the Conservation Area, in particular St Dunstan in the West and St Bride's, allowing this expression of the Conservation Area to still be read in the context of wider skyline monuments such as the Royal Courts of Justice and St Paul's Cathedral. It would form a complementary high-quality architectural neighbour to St Bride's, massed in a deferential manner

allowing the distinct vertical skyline presence of the church spire to be preserved. It would take an appropriate place as part of an established backdrop of a modern, taller development off Fleet Street and around New Street Square, adding a high-quality new piece of modern architecture. This element of setting which makes a significant contribution to significance would be preserved.

467. Overall, the setting, character and appearance and significance of the Fleet Street Conservation Area would be preserved.

Temples Conservation Area

Heritage Significance, Character and Appearance:

468. Of ancient origin, the Temples is perhaps the most distinctive City conservation area and has a character that is not only unique to the City, but rarely found elsewhere. It has a restrained, dignified, private and often tranquil character, in pleasant contrast to the bustle of Fleet Street or the Embankment. It comprises an exceptional collection of outstanding buildings as part of a lush open landscape setting comprising the Inner and Middle Temples and the Temple Church. To summarise the outstanding significance of the Temples derives from:

- It has a distinct and venerable legal quarter of ancient origin resulting in a collection of outstanding authentic survivals from the 17th, 18th and 19th Centuries comprising rare legal chambers, domestic quarters and buildings associated with the Inns of Court.
- An outstanding townscape of collegiate character comprising courts, squares and streets, and strong sense of domestic human scale, of complementary architectural styles and materials, all set in the verdant setting provided by the Inner and Middle Temple Gardens.
- Its connections with the Knights Templars and the focus on the Temple Church, based on one of the holiest places in the Crusader world, the Church of the Holy Sepulchre in Jerusalem, it is one of the oldest and most significant ancient churches in the City.

Contribution of Setting:

469. Elements of setting make a significant contribution to significance and an appreciation of it, in the form of environmental qualities, in particular views of and through it, but also of wider intangible qualities. In relative order of contribution, those elements comprise:

- Strategic pan-London kinetic views from Hungerford and Waterloo Bridges and the South Bank Queen's Walk looking north and east, where it is seen as part of the Victoria Embankment and as part of the wider skyline. These make a significant contribution to significance and an appreciation of it.
- Those views out of and through the Conservation Area of the sky, in particular when there is limited influence of wider built development, accentuating the self-contained and distinct integrity and authenticity of the Conservation Area ensemble. These make a significant contribution to significance.
- Views into the Temples which act as 'portals' which transition between the bustle of Fleet Street / the Embankment, accentuating the sharp contrasts in character and appearance. The peaceful, restrained and often tranquil intangible qualities of the public realm, and their contrast with the bustle of the City around it, make a significant contribution to significance and an appreciation of it.

Impact:

470. There would be no direct, tangible alteration or change to the physical asset, whose ancient and rare historic fabric would be untouched. In most views from within the intimate enclosure and tight-knit grain of the Conservation Area, the proposals would be imperceptible.
471. Historic England contend that the proposal would dominate the skyline when viewed from the South Bank, in particular from Waterloo Bridge (LVMF 15B.2) and Gabriel's Wharf (LVMF View 16B.1), and "draw attention away from these heritage assets, thereby causing harm to the character and appearance of the conservation areas and the perception of the significance of the (unspecified) listed buildings".
472. Officers disagree and find no conflict with the LVMF as discussed in the section on Strategic Views above. In views from the Hungerford and Waterloo Bridge's, and the South Bank between Waterloo Bridge and Blackfriars Bridge, via Gabriel's Wharf, the proposal would be an appropriate backdrop skyline feature, complementing, and reading part of, a collection of taller modern built form in and around New Street Square. The open prospect across the breadth of the River Thames and the arcadian riparian scene created by the enclosing combination of the Victoria Embankment and Temple Gardens would remain pre-eminent. Without undue prominence, the high-quality architecture and tiered landscaped massing would assist the assimilation of the proposal into this scene, whereas its silhouette would take its place as part of a high-quality backdrop. It is considered that setting element 1, pan-London strategic riparian views, would be preserved.

473. In terms of those views out of and through the Conservation Area (setting element 2), for moments within the Gardens, and Kings Bench Walk, and Victoria Embankment, the proposal would come into view. While there would be a change within this element of setting, officers consider that this would be consistent with the existing context where other modern developments can be glimpsed over the rooflines of the terraced blocks, particularly the King's Bench Walk group. Overall, officers do not consider the proposal would detract or dominate, and would be experienced as an incidental moment, preserving the quiet enclosed and unique significance of Temples Conservation Area. It is considered that setting element 2 would be preserved.
474. In terms of setting element 3, the experience of the transitional portals and the intangible qualities of the public realm in contrast with the surrounding bustle of the modern City, it is considered that these would be unaffected and thus preserved by the proposals.
475. Overall, it is considered that the proposal would preserve the setting, character and appearance and significance of the Temples Conservation Area.

Strand Conservation Area (City of Westminster)

Heritage Significance, Character and Appearance:

476. The Strand Conservation Area incorporates the grand early 20th Century project of improvements to the Strand and the creation of Aldwych and Kingsway, a grand continental style half circus and boulevards defined by formal and robust Portland Stone-faced classical architecture of a civic scale, north towards Lincoln's in Fields, whilst incorporating the ancient Strand, Somerset House and part of the Victoria Embankment and the Royal Courts of Justice to the east. It is of outstanding architectural, historic and artistic heritage significance, considered to principally derives from:
- The central 'national spine' comprising the Strand, an ancient Processional Route of Royal and State significance, lined by its often grand and formal architectures of institutions of state, cultural and commercial significance, with a picturesque townscape with infolding the vistas of important landmarks, including the Churches of St Mary Le Strand, St Clement Dane and the Royal Courts of Justice, alongside rich statute of national significance.
 - The Victoria Embankment and Waterloo Bridge as remarkable piece of urban infrastructural and planning improvements and the iconic London views they contain.
 - Somerset House as a seminal London and landmark of the River Thames and one of the finest survivals of Georgian London.

- The contrast between the larger formal architectural some of the that humbler and more informal architectural from a variety of ages.

Contribution of Setting:

477. Elements of setting make a significant contribution to significance, in particular an appreciation of it. In order of relative contribution these are considered:

- Views into the Conservation Area from west and east in particular, where the Strand itself forms an integral part of a ceremonial processional route of Royal and State significance, part of an unfolding sequential townscape national monuments and landmarks. This makes a significant contribution to architectural and historic significance.
- More incidental and formal views from the immediate streetscape on approach from the south (the Embankment) and the north (Covent Garden/Holborn). This makes a moderate contribution to architectural and historic significance.
- Those pan-London riparian views from the River Thames, its embankments and bridges, including identified strategic LVMF views from the South Bank, Gabriel's Wharf, Waterloo, Hungerford and Westminster Bridges (downstream). These make a moderate contribution to architectural and historic significance.

Impact:

478. As discussed in the sections on St Mary Le Strand, St Clement Dane and the Royal Courts of Justice, these landmark buildings form part of an emerging skyline along the Processional Route. For the reasons established there, by virtue of the proposed development's diminishing massing, its contoured architectural form its high quality vertically expressed elevations and its position in the distant background, officers consider that it would amount to a fleeting 'moment' of new development, and would not obscure or detract from that picturesque townscape experience. Despite Historic England's identification of harm to this element of setting, for the reasons above, officers disagree and conclude proposal would preserve the contribution of setting element 1.

479. The proposal would have no influence on those more incidental or formal localised townscape views through the Conservation Area and setting element 2's contribution to significance would be preserved.

480. In terms of setting element 3, the skyline presence of the Strand Conservation Area would appear at a significant distance to the west of the proposal and would not be obscured or detracted from. For the reasons established under

the Strategic Views section, officers disagree with the view of Historic England and conclude that the proposal would also not cause harm to those wider riparian views from the Thames and its embankment, Waterloo, Hungerford or Westminster Bridge. Overall, it is considered that setting element three's contribution would be preserved.

481. Overall, it is considered the proposal would preserve the setting, character and appearance and heritage significance of the Strand Conservation Area.

Whitefriars Conservation Area

Heritage Significance:

482. The heritage significance of Whitefriars Conservation Area is covered in detail in the Character Summary and Management Strategy SPD (2016), which is a material consideration. It summarises its significance as stemming from:

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

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

Contribution of Setting:

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

- Strategic pan-London riparian views from Hungerford and Waterloo Bridges and from the South Bank Queen's Walk comprising open river prospects

across the City skyline. These make a significant contribution to architectural and historic significance, in particular and an appreciation of it.

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

Impact:

485. The Conservation Area comprises land due south of the proposal, sharing no direct visual interaction from inside the Conservation Area. The proposal would not be visible in any identified view in the Conservation Area SPD.

486. The proposal would appear in the near wider setting as part of an established backdrop to the Conservation Area from broad riparian river prospects from the South Bank Queen's Walk. From here Whitefriars and the adjoining Temples Conservation Area command the foreground setting and scale of an open prospect across the River. Their respective pre-eminent skylines would be preserved on the whole. Many of the buildings that line the southern boundary of the Whitefriars Conservation Area fronting the river, are grade II listed and form a dignified group: Hamilton House; Telephone House; No.9 Carmelite Street; Sion Hall; City of London School; and Unilever House. While of different periods and styles, each building contributes to a richly textured townscape, with a distinctive roofscape, which gives this boundary of the Conservation area its distinguished character and appearance. Where glimpses of the development would be visible beyond the river front buildings, the tiered massing and vertically articulated façade would be unobtrusive, ensuring their pre-eminence within this setting would be unchallenged. Overall, officer consider that the proposal would successfully integrate into the established secondary layer of townscape which has emerged to the north of Fleet Street, and that it would be experienced as a subservient element beyond the riverfront buildings, and the background of the Conservation Area.

487. From Hungerford and Waterloo bridges, the proposal would assimilate with that mediation of scale between the Embankment and those taller skyline structures on raised land to the north of Fleet Street and would not dilute or overwhelm the Conservation Area in the foreground. As such, setting element 1, wider riparian views, would be preserved.

488. In terms of setting element 2, both views south of Fleet Street, and along the embankment would be undiluted given the density of intervening development, and the close grain of the urban fabric which would restrict any views to the

proposed development. As such, it is considered setting element 2 would be preserved.

489. Overall, the proposal would preserve the setting and character, appearance and significance of the Whitefriars Conservation Area.

Other Designated Heritage Assets

490. In accordance with paragraph 200 of the NPPF, the assessment of heritage impact has been extensively scoped, using digital modelling software to identify heritage receptors through a zone of theoretical visibility. The impact on these receptors was then checked in a 3D model as part of a desk-based assessment and accurately detailed with verified photography and site visits to illustrate the extent of visual influence (field evaluation).

491. As a result of this methodology, potential impacts of the proposal on the settings of the above heritage assets have been identified and assessed.

492. In respect of other heritage assets, officers have scoped an extensive number. The definition of setting is the extent to which an asset is 'experienced,' which is not geographically set and can change over time, relating to more than just a direct visual influence. Given the dense central London location, the site is within the setting of an enormous number of heritage assets, and it would be disproportionate to assess them all.

493. In particular, it is considered that the following were found to have no visual relationship with the proposal and therefore were scoped out of the assessment:

- Temple Church - Grade I
- Middle Temple Hall – Grade I
- Church of St Sepulchre – Grade I
- Church of St Martin Ludgate - Grade I
- Church of St Andrew by the Wardrobe – Grade I
- The Daily Express building – Grade II*
- Caretakers Lodge – Grade II
- 6 Bolt Court – Grade II
- 146 Fleet Street – Grade II
- Ye Olde Cheshire Cheese PH - Grade II
- 143 and 144 Fleet Street - Grade II
- The Daily Telegraph Building - Grade II
- Mersey House - Grade II
- 8 Red Lion Court – Grade II

- 5 and 6 Crane Court – Grade II
- Middle Temple Gardens Registered Park and Garden (RPG) – Grade II

Conclusion on Heritage:

494. The proposals would preserve the significance (via change in the setting) of heritage assets and an appreciation of it. As such, they would accord with Local Plan policies CS12 and DM12.1, emerging City Plan 2040 policies S11 and HE1, London Plan policy HC1, having accounted for and paying special regard to s.66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant NPPF policies.

Archaeology

495. The City of London is considered an archaeologically sensitive area in its entirety. 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.

496. NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration.

497. An Archaeological desk-based assessment was submitted by the applicant. The Greater London Archaeological Advisory Service (GLAAS) and the City Archaeology Trust were consulted. The latter confirmed no comments.

498. The assessment concludes that, although the site lies within an area where Roman remains have been found, only a low potential for post-medieval remains is now present on the site. This is due to the presence of a double basement across the majority of the site which would have removed all archaeological remains of interest.

499. GLAAS responded to confirm that the works are unlikely to have a significant effect on heritage assets of archaeological interest. GLAAS stated that the assessment did not include an assessment of the impact on potential archaeology of the public realm particularly Gunpowder Square however, the public realm impacts are limited to tree pits and new services and archaeological remains of interest are likely to be located c 1.5m below ground level and therefore it is unlikely that the new development would have an impact on significant archaeology. GLAAS confirmed no further assessment is necessary and a condition has been recommended.

Public Access and Inclusivity

500. 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 2040 and policy D5 of the London Plan. In particular, policy DM10.8 requires 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.
501. Local Plan policy DM 10.8 requires “*to achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished)*”. A service provider also has an anticipatory duty under the Act.
502. An access statement has been provided with the application, in addition to an Equality Statement and Statement of Community Involvement.
503. The application is accompanied by an Access Strategy submitted as part of the Design and Access Statement. The proposals were subject to review by City of London Access Group (CoLAG).
504. London Plan policy D5 says that development should be ‘convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment’. The access statement details points of entry, landings, door types, level thresholds and the need for manifestation.
505. Consideration has been given to the points of arrival at the site and the main office entrance amended following comments. An Access Management Plan (AMP) to for visitors and building users on points of arrival and entrances would be required and would be secured by condition.
506. Arrival at the site has been considered for a number of travel options. Inclusive Mobility table 3.7 sets out the recommended limits for walking distance without a rest and it is noted that a number of the points of arrival exceed these. It is therefore welcome that an additional two blue badge spaces are proposed near to entrances. Continuing provision of the three existing Blue Badge spaces in the area during construction is important and it is recommended that details are reserved of how this continuous provision will be secured.
507. The provision of places to store mobility scooters is welcome in principle and should include charging points. Further details of this could be included within an AMP.

508. The City Walkway provides an opportunity to cross the site at present but does not have rest points and is not a welcoming, or intuitive route.
509. Wayfinding is of particular significance, including for the relocation of the library and loss of familiarity which is particularly important for some people with information &/or sensory processing differences (PAS 5.3.1, 5.4). However, it is considered that the library entrance will be relocated but will be much more prominent and legible in the public realm, than the existing, which is welcomed.
510. Pedestrian approaches to the various points of entry accommodate significant changes in level, and have been the subject of discussion through the design process. The significant level changes to be accommodated and wayfinding and legibility needs to be given the highest priority both around, and across the site. It is recommended that the wayfinding strategy tests scenarios from points of arrival for a range of people, following the principle of at least 'two senses' (BS 8300 (1) 5.2.3). Principal entrance points, in particular, need to be clearly legible and it is noted that totems may not be accessible to all people. This additional consideration of wayfinding for disabled people could form part of details reserved for wayfinding and signage.
511. Materials throughout the development will be of great importance and this will need particular consideration for circulation and reception areas, to avoid the potential for sensory overload from acoustic or visual stimulus (PAS 6463), details to be secured by condition.
512. The proposals for the Gunpowder Square public realm will include a mix of both open and more intimate spaces, and maintain 2m pedestrian comfort levels, which is welcomed. There have been discussions through the design process regarding the use of contrasting strips within the hard landscaping which are set counter to intuitive routes. There are concerns about the potential to perceive these strips as barriers or holes (PAS 6463 note 7 and 12.6). Barriers to the beds are currently shown as open at the bottom and of variable height – these should be consistent with AD K and detectable by people with visual impairments. Details to be secured through condition.
513. Reception and lobby areas to both office and library space incorporate 'bleacher' seating. Space should be made to integrate wheelchair spaces within the body of the seating and this is referenced as the intention for the library. It should remain central to further stages of design development. Hand and grab rails should also be provided. This should be provided through condition details.

514. Reception facilities should be consistent with AD M(2): 3.6 and BS 8300 8.6.2 Routes from the entrance/lobbies should be logical, clearly defined and unobstructed, with adequate and sufficient circulation space. Reception area desks should be positioned away from the entrance to minimise noise, with lowered counter sections, appropriate hearing enhancement systems and the surface of the reception area should be slip resistant. Details should be provided through condition.
515. London Plan D5, (B)5 states 'in all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building'. 6.2.1 further states that there should be an evacuation lift in addition to fire-fighting lifts. Proposals and the access statement confirm that all lifts will be more than 1100x1400mm with appropriately sized landings and back-up lifts are identified across the site in case of failure. The lift size is not sufficient for users of larger mobility vehicles and alternative provision should be identified through the AMP, particularly for library visitors. It is recommended that details of lifts are reserved.
516. It is regrettable that visitors to the library will have to use stairs or a lift to access many primary functions at mezzanine level as this separates people who need step-free access and there is potential for queuing at busy times. The AMP should identify how events will be managed to avoid this happening, and maintenance for the platform lift to mezzanine level would be secured in the Section 106.
517. Many platform lifts are not accessible for people with dexterity impairments or who suffer from fatigue. BS8300 3.22 discourages them other than in 'exceptional' circumstances. New generation platform lifts which do not require continuous pressure are currently proposed and which are more consistent with standard passenger lift operations. The scheme would not be considered inclusive without such provision. Therefore details for lifts have been recommended by condition.
518. There are marked level changes across site and there are areas where ramps are proposed instead of slopes. However, these will be consistent with AD M(2) 3.53 and AD(K)2.
519. Corridor widths and door openings are confirmed as consistent with AD M(2), including sufficient door widths and passing places for wheelchairs and will be subject to detailed design development.
520. Accessible WC (AWC) provision is otherwise provided for the various functions. There are unisex cubicles only proposed on upper floors although

the government proposal for separate male and female toilets and public buildings is noted. Ambulant unisex facilities are also included. The absence of enlarged facilities is regrettable as these are useful to disabled people who may need a larger space or have bags. Concerns were raised regarding the distance to AWCs from the entrances although it is noted in the access statement that there is no more than 40m travel distance, as consistent with AD M(2) 5.10.h.

Cycle Provision

521. Cycle entrance for the building is via Wine Office Court. Cycle provision will be consistent with the 5% of larger spaces recommended by London Plan Policy T5B and London Cycling Design Standards 8.2.1. There are accessible facilities proposed to support cyclists. Controlled entry points should be sufficiently wide to accommodate larger bikes and be consistent with guidance in BS 8300(1) 7.11 and BS 8300(2) 8.3/8.5.3

Changing Places

522. A Changing Places toilet was agreed during development of the proposals and which will support the public functions of the library and help make it more accessible to more people. There are few Changing Places facilities within the City at present and, although not available on a 24 hour basis, this is a key element of making the scheme more inclusive. Management and operation should be covered in the AMP and would be secured via Section 106 obligation.

Public realm works

523. Where seating is proposed arm supports should be provided to give options for left, or right hand side support, as well as options for seating with back support. The areas of landscape have the potential to offer places for rest and recovery, consistent with guidance in PAS 6463: Design for the Mind. Details would be secured through condition.

Gym facilities

524. BS8300 2: 20.8.4 says that 'Disabled people should have the same access to all fitness and exercise areas, and types of equipment, as non disabled people' and this should inform the provision of gym equipment/facilities. Details to be provided in the AMP through recommended condition.

Public Access and Inclusivity Conclusion

525. Further design details and an Access Management Plan are proposed to be secured via condition.
526. Overall, and subject to the imposition of conditions, the proposal would accord with the access policies outlined above.

Highways and Transportation

Public Transport

527. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B. There are several stations within walking distance: City Thameslink (260m), Chancery Lane (500m), Blackfriars (500m), Farringdon (600m), St Pauls (640m) and Temple (730m). Together these stations give access to a wide selection of London Underground (LU) and National Rail services. These stations provide good connection to destinations across all London.
528. The bus stops located on Farringdon Street, Holborn Viaduct, and Fleet Street provide access to 10 routes. These stops would provide good access for uses to travel to / from the site via bus as part of a primary or 'final leg' journey.
529. Cycleway 6 (C6) runs approximately 150m east of the site along Farringdon Street and the site is located close to 4 cycle hire docking stations. The site is therefore well located to encourage cycling to / from the site.

Trip generation

530. Within the Transport Assessment (TA) a trip generation forecast has been conducted for the site which identifies the net change in trips that would result from the proposed development. The assessment has used TRICS travel data from similar land uses within Greater London.
531. The trip generation assessment considers the AM and PM peak hours but does not consider the MID peak hour. The trip generation assessment identifies that the proposed development as a whole would generate 976 trips during the AM peak (8:00-9:00) and 1,156 trips during the PM peak (17:00-18:00). When considered against the existing site and associated trip generation (also calculated via TRICS), this is an increase of +635 trips during the AM peak and +786 trips during the PM peak.
532. The restaurant trip rates rely on a singular TRICS site owing to a lack of representative sites within the TRICS database. It is acknowledged that this

limitation is unavoidable, and the trip rates applied are accepted. No downward adjustment of 'linked trips' commonly associated with retail uses has been made and is therefore considered a robust approach.

533. The mode shares presented for the site would appear to underestimate the likely mode share for cyclists (4.1% for office and 1.9% for retail). Whilst this low cycle mode share is not agreed, it is insignificant when considered against the assessments of other modes, as a lower cycle mode share would inflate all other modes proportionally and therefore represents a 'worst-case' assessment for these other modes (footways / public transport).

534. Given the accessibility of the site in relation to local public transport services and when considering the projected mode share of trips, it is considered that this additional level of activity could be absorbed by the existing Transport network, subject to appropriate mitigation and improvements to local footway conditions.

Public Footpath, Public Realm Alteration and Access

535. Local Plan Policy DM 16.2 states that: "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:

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

536. The proposal will result in the loss of City Walkway through the site. However, as noted elsewhere within this report, the existing route through the building is of limited benefit, it begins and terminates mid-block and does not logically follow the pedestrian desire lines. The existing route is also of limited quality, with a lack of overlooking (natural passive surveillance) and lighting, which makes the current route unattractive.

537. To offset the loss in principle of this functional route, enhancements to Gunpowder Square have been proposed, to create much-improved public realm park, subject to S278 Agreement, along the key pedestrian desire line between New Street Square and Fleet Street. It is considered by officers that this trade-off is acceptable.

538. The outline of the building is proposed to change as part of this application and a Pedestrian Comfort Level (PCL) assessment has been undertaken to assess the forecasted impacts of the proposals on pedestrian comfort in cognition of the proposed public realm improvements. The PCL assessment refers to a

previous 2022 study undertaken by Momentum, which investigated the pedestrian impacts of the proposed amendment of the existing City Walkway. This previous study identified that there would be no discernible impact on pedestrian comfort levels as a result of the proposals, with comfort levels ranging from B to A+.

539. The proposed development is forecasted to generate an uplift of 2,962 two-way daily trips beyond the levels originally forecasted by the 2022 study (4,317); equivalent to an increase of 69%.
540. The 2022 study identified that the lunchtime peak period was the busiest period on the surrounding streets. The applicant has undertaken an updated PCL assessment of this lunchtime period as part of the TA. The footways assessed and considered most relevant are those surrounding the Site and include Little New Street (south footway), Shoe Lane (west footway), and Printer Street (east footway) where the new entrances are located for the library and gym / auditorium space. Wine Office Court was not assessed in these updated scenario tests as it was recognised within the 2022 study as having a comfort level of A+ in both existing and future scenarios.
541. The results presented by the applicant indicate that there is anticipated to be no change in the pedestrian comfort level of the assessed footways along Little New Street (comfort level of 'A') and Shoe Lane (comfort level 'A-'). There will be a slight reduction in the pedestrian comfort level for Printer Street from an 'A' to an 'A-', which is considered immaterial and is still within an acceptable and comfortable range. However Officers consider that footways should be considered in more detail as part of the proposed Section 278 works including updated pedestrian counts should be undertaken.
542. The results of the PCL assessment should be considered in addition to the more holistic public realm design improvements that would be delivered by the scheme. The removal of the existing City Walkway, in combination with the public realm and landscape strategy of the proposed development, will result in a positive and beneficial impact on pedestrians and users of the space, which would also include users not directly associated with the proposed development.

Car Parking

543. The proposed development will be car-free and the existing car parking area converted to create space for cycle parking. As a result, all vehicle trips generated by the development will be associated with delivery and servicing or disabled drivers.

Disabled Car Parking

544. Allocated space within the site has not at this point been made for the provision of disabled motor vehicle parking. It is acknowledged that local disabled parking is available on the local highway as mentioned in the submitted Transport Assessment. There is one existing disabled parking space located to the front of the site on Little New Street. It is proposed by the applicant that two further disabled parking spaces could be provided on Little New Street, adjacent to the existing bay. The applicant has also committed to providing these spaces with Electric Vehicle charging capabilities. Officers consider this acceptable and the final provisions would be subject to the S278 process and agreed through discussions at the relevant time with CoL Highways.

Servicing

545. It is proposed to provide an on-site service yard at the south-eastern corner of the site, with access from Shoe Lane. The service yard would be provided at-grade and has been designed to provide space for simultaneous delivery activity within 2 loading bays. Sufficient manoeuvring space is provided to enable entry and exit from the servicing yard in forward gear by vehicles including a 7.5 T Box Van, the CoL 7.5 m refuse vehicles and a 10m electric refuse vehicle, which form part of the existing waste management teams' vehicle fleet (as demonstrated by the Swept Path Analysis provided).

546. This is a significant improvement from the existing site provision, whereby larger vehicles have insufficient space to enter and exit the site in forward gear (resulting in reversing manoeuvres from the highway).

547. It is forecasted by the applicant that the development would generate a demand of 103-104 deliveries per day, which would be an increase in deliveries to the site of 68-69 deliveries per day. Of these 104 servicing trips, it is estimated that approximately 96 would be associated with the office element, 6 would be associated with the retail element, and 2 would be associated with the library / gym uses.

548. To mitigate the impacts associated with the forecasted servicing demand, the applicant has committed to consolidate deliveries. A consolidation reduction factor of 50% has been applied, which would result in 49 deliveries per day (or a net increase of 14 trips when compared to the existing scenario). It is worth noting that this moderate increase in servicing trips would be off-set by the removal of the existing car park.

549. The Applicant commits to restricting servicing activity between the peak network hours of 07:00-10:00, 12:00-14:00 and 16:00-19:00. On the basis of

deliveries being undertaken during daytime hours only (i.e. 05:00-07:00, 10:00-12:00, 14:00-16:00 and 19:00-22:00), there would be 9 servicing hours across the day. Applying a vehicle dwell time assumption of 20 minutes per delivery, the two loading bays provided have a theoretical capacity for 54 deliveries by vehicles per day. This theoretical servicing capacity does not however include for cargo bike deliveries, which would be permitted to occur within the restricted peak periods and would serve to provide additional servicing capacity.

550. The applicant commits to the production of a detailed Delivery and Servicing Plan (DSP) to be secured by condition / obligation. The detailed DSP will set in place the specific management tools that would be employed by Facilities Management to ensure servicing is suitably managed to ensure no unnecessary on-street servicing occurs. The DSP also presents the opportunity to promote and action consolidation at the development, as well as promoting green servicing options such as last mile cargo cycle logistics, and electric servicing vehicle use.

551. The development with the production of a detailed DSP meet London Plan policy T4 and Local Plan Policy 16.1 requirements and are considered acceptable.

Cycle Parking

552. London Plan Policy T5 (Cycling) requires cycle parking be provided at least in accordance with the minimum requirements set out within the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.

553. The proposed development will deliver a minimum of 750 long-stay cycle parking spaces at basement 2 level, accessible from a wide staircase with cycle channels enabling two-way movement, as well as suitably sized lifts. This meets London Plan standards. The cycle provision will comprise:

- 5% Accessible cycle parking spaces;
- 3% Sheffield stand spaces;
- 10% Folding cycle lockers; and
- 82% Two-tier cycle stands.

554. The proposals will deliver 113 short-stay cycle parking spaces as a minimum, meeting London Plan standards, as well as the reprovision of the existing 24

cycle parking spaces located on Wine Office Court. The short-stay cycle parking will be provided both internally within the building and externally to complement the existing provision on Wine Office Court. The internal short-stay cycle parking comprises 50 spaces at upper ground floor level for use by visitors, which offers a sheltered, secure and managed facility. The 50 internal short-stay spaces will be divided between 16 Sheffield stand spaces and 34 two-tier stand spaces. The remaining additional external short stay spaces would total 63.

555. The applicant commits to the production of a full Travel Plan (to be secured by condition / obligation) which would encourage the uptake of cycling as a mode of travel to / from the site.

Travel Plans

556. The City is an extremely busy area, and this development would lead to a large increase in numbers traveling to and from the site with an expected uplift in jobs of over 2,000 people.

557. In this instance we would seek to mitigate the impact on this development by requesting a Workplace Travel Plan be put in place, this will not be required to cover the gym / library areas of the site as the proposals for these elements do not meet the thresholds to be required. Travel Plans are an effective tool for managing visitors, volunteers and employees at a site by helping to promote sustainable transport and raising awareness of their benefits.

558. If planning permission is granted a Workplace Travel Plan would need to be secured as a section 106 planning obligation in order to meet London Plan policy T4 and Local Plan Policy 16.1. The travel plan would need to be approved by the CoL prior to completion of the proposed works. This would include a requirement for a Travel Plan Co-ordinator to be appointed no less than 3 months before occupation.

559. Transport for London encourages applicants to use the TRICS database for trip generation predictions. We will require the applicant to undertake a TRICS after study and provide TfL and the CoL with the results on completion of the development. We will seek to secure the necessary after surveys and results by Section 106 agreement as part of the Travel Plan review and monitoring process.

Management of Construction Impacts on the Public Highway in the local area

560. The applicant has submitted an Outline Construction Logistics Plan (CLP) which indicates that the construction programme would last for approximately

45 months with an indicative start date of February 2026. It is envisaged by the applicant that a temporary loading bay pit lane arrangement will be provided on Little New Street adjacent to the Site to enable construction works.

561. It is noted that the Principal Contractor for the proposals has not yet been appointed and so all information provided in the outline documents is indicative in nature (as is common practice for outline planning documents).

562. No vehicle movement forecasts are provided by the applicant at this stage. It is however expected that the proposals would generate a significant amount of demolition and construction traffic owing to the works required. As a result, the proposed works could have a significant impact on the operation of the public highway in the local area if the impacts are not managed effectively. The primary concern is public safety it must be ensured that construction traffic does not create (or add to existing) traffic congestion or impact on the road safety or amenity of other highway users. The proposal is also likely to lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality).

563. A preliminary Construction Logistic Plan (CLP) has been submitted in support of the planning application. This provides useful information to describe the proposed works and how they would be undertaken. It also provides useful information to describe how the impacts associated with the construction period would be mitigated. It lacks detail but is a good example of what is required at this stage in the process. A more detailed CLP should be prepared once a Principal Contractor has been appointed, which will need to be in line with Transport for London's Construction Logistics Plan Guidance.

564. This should consider the following points:

- Construction vehicle routes to and from the site will need to make the most efficient use of the highway network in the Central London Area. Such routes will require discussion with CoL Highways.
- The proposed works are likely to generate a significant amount of workers on the site at any given time. It would be expected that the Principal Contractor to prepare travel planning guidance to encourage workers to use sustainable transport instead of private motor vehicles.
- Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc).
- Traffic congestion is already a significant problem in the CoL, particularly during morning and afternoon/evening peak periods, therefore it is expected construction vehicle movements to be scheduled to avoid 0800 to 0930 and 1600 to 1830 hours on Monday to Friday.

- Details will be required to describe how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements.
- The site would be registered with the Considerate Constructors Scheme. It would be expected for the proposed works to be undertaken in accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme.

565. The CoL needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. Therefore, if planning permission is granted a CLP should be secured via condition to ensure the construction and demolition of the site is in accordance with The London Plan Policy T7 and DM16.1 of the Local Plan. This would provide a mechanism to manage / mitigate the impacts which the proposed development would have on the local area. The CLP would need to be approved by the CoL prior to works commencing on site.

Highways Boundary

566. Alterations to the highways boundary have not been identified at this stage.

567. The applicant identifies proposed Hostile Vehicle Mitigations measures on the public highway however it is questioned whether these are required on security grounds. The principle of obstructing the highway is resisted unless can be justified and would be considered further as part of a Section 278 Agreement.

Over Sailing and Basement Alterations

568. Undersailing and oversailing of structures has not been identified at this stage and therefore it is assumed that there are no requirements for the introduction of (or changes to) any under / over sailing licenses.

S278 Agreement

569. All works on the public highway shall be undertaken by the City's Term Contractor.

570. The applicant is required to enter into a Section 278/38 Agreement of the Highways Act 1980, prior to the occupation of the site for the following works, but not limited to:

- Repaving of all the adjacent footways in Little New Street, Pinter Street, Gunpowder Square, Wine Office Court and Shoe Lane

- Resurfacing of the carriageways at the locations
- Reinstatement of Road Markings
- Installation of all the public realm works within the public highway, as per the planning approval, including, implementation of landscaping, trees, planters, planting, seating, relocation of the existing cannon in Gunpowder Square, installation of public art and any other associated works
- Improvements to drainage
- Improvements to lighting
- Improvements to safety per ATZ observations received for the application
- Removal of bollards
- Further analysis for footways as part of the proposed Section 278 works including updated pedestrian counts should be undertaken.

571. The applicant has proposed planters with balustrade to accommodate the changes in levels between Shoe Lane and Wine Office Court. The details of its construction will be addressed during the detailed design of the S278 project and subject to feasibility.

572. The implementation of the additional disabled bays is subject to public consultation.

573. The applicant is required to submit the details of the threshold levels at the highways boundaries, prior to the commencement of construction works.

574. The applicant is required to submit a condition survey of the adjacent highways prior to the commencement of any construction works.

575. Any part of the proposed development requiring works to the public highway following construction works will be secured through planning to repair any damage to transport infrastructure, landscaping and to reinstate all affected transport network links, road and footway surfaces.

576. Should planning permission be granted the following S106 planning obligations and conditions, along with a S278/38 which would need to be secured:

- A condition to secure a Construction Logistic Plan (CLP). The Section 106 agreement shall state that the CLP shall be approved prior to any works starting on site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority. It should also restrict HGV movement to and from the site to within the hours of 9:30 to 16:30 Monday to Friday, 8 till 13:00 Saturdays and fully restrict movement on Sundays and Bank Holidays unless agreed with the CoL in advance.

- A Section 106 planning obligation to secure a Workplace Travel Plan (TP) for the development. The Section 106 agreement shall state that the TP shall be approved prior to the first occupation of the site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority. The Section 106 agreement shall require the applicant to undertake a TRICs after survey and to provide TfL and CoL with a copy of the results as part of the travel plan review and monitoring process.
- A S278/38 to secure a financial contribution to cover the cost of public highway and public realm improvement works in the general vicinity of the site. These works would include but are not limited to enhancements to the public highway around the site on Little New Street, Pinter Street, Gunpowder Square, Wine Office Court and Shoe Lane.
- A condition requiring the provision of 750 long stay cycle parking spaces, 113 short stay cycle parking for the entire development, designed to London Cycle Design Standards and the ongoing retention of these facilities, details of which will need to be submitted and approved, and approval should be reserved by condition.
- A Section 106 planning obligation to secure a Delivery and Servicing Plan (DSP). The Section 106 agreement shall state that the DSP shall be approved prior to the first occupation of the site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority. A daily servicing vehicle cap should be applied to the proposals, limiting the daily maximum to 49 vehicles.

Response to TfL Comments

577. Many of the comments offered by TfL have been addressed within this report. For clarity, the key items are discussed further below.

578. Concerns raised by TfL regarding the trip generation methodology adopted are not agreed for the following reasons:

- The majority of retail has been accounted for in full (823sqm) and just 320sqm of office / retail / café has been 'excluded'. On the basis that this equates to more than 50% of the total potential retail provision, it is considered that this approach adequately captures the trip generation of the proposed retail, given that a significant portion will, in reality, form 'linked' or 'pass-by' trips.
- It is agreed that trips to the gym would largely be linked or pass-by trips as part of existing network trips (or linked to the proposed office use).
- The library use would be a (reduced) replacement of an existing use.

579. The applicant has committed to providing EV charging capabilities for the on-street disabled bays proposed.

580. The cycle parking proposals align with London Plan requirements and LCDS compliant cycle parking would be secured by condition.
581. A financial contribution towards cycle hire facilities is considered a reasonable request and should be discussed as part of the Section 106.
582. Conditions would be secured linked to comments made with respect to the DSP, CLP, and Cycle Promotion Plan.

Transport conclusion

583. The proposals are acceptable in transport terms subject to the necessary conditions and obligations as discussed above along with a S278/38 agreements.

Environmental Impact of Proposals on Surrounding Area

584. Local Plan policy DM10.1 requires the design of development and materials used should ensure that unacceptable wind impacts at street level and in the public realm be avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy 10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2040 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

Daylight, Sunlight and Overshadowing

585. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context.
586. Local Plan Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.
587. Draft City Plan Policy DE7 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards taking account of the Building Research Establishment's guidelines.

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

589. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.

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

- Daylight: Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important. The BRE Guide states that diffuse daylighting of an existing building may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.
- Sunlight: Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchens and bedrooms to be less important, but that care should be taken to not block too much sun from these rooms.

Interpreting results

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

592. A Daylight, Sunlight and Overshadowing Assessment has been submitted to consider the potential effect on the daylight and sunlight amenity within existing neighbouring residential properties, as well as overshadowing to relevant existing neighbouring amenity space. These assessments have been undertaken in accordance with the BRE Guidelines (2022).

593. An independent review was undertaken by GIA consultants.

594. The potential daylight and sunlight impacts have been assessed on the following existing neighbouring properties;

- Pemberton House (residential);
- Dr Johnson's House, 17 Gough Square (museum);
- 16 St Johnson's Court (The Curator's Cottage) (residential);
- 7 Wine Office Court (residential);
- 3 Wine Office Court (residential);
- 2 Wine Office Court (residential);
- 1-23 Bolt Court (residential); and
- 148 Fleet Street (residential).

595. Included within the existing baseline condition are two neighbouring sites (currently under construction) to the east of the Site at Stonecutters Court (ref: 18/00878/FULMAJ) and 120 Fleet Street (ref: 21/00538/FULEIA) therefore this baseline condition provides the 'worst-case' in terms of the baseline levels of light received by the key properties being assessed.

596. The following properties fully meet BRE criteria for daylight and sunlight assessment:

- Dr Johnson's House - 17 Gough Square;
- 16 Johnsons Court(The Curator's Cottage);
- 3 Wine Office Court;
- 2 Wine Office Court; and
- 148 Fleet Street.

597. Therefore the results for Pemberton House, 7 Wine Office Court and 1-23 Bolt Court are discussed further below.

598. A further Climate Based Daylight Modelling (CBDMD) was undertaken for Pemberton House.

599. Daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL), these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assesses the proportion of a

room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC or the NSL guidelines are not met.

600. The BRE criteria state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).

Pemberton House

601. This residential building is located immediately to the west of the Site, and separated only by Gunpowder Square. City records show 39 properties at this address.

602. Of the 163 windows assessed serving 89 rooms, the majority of windows (94) would meet BRE criteria when assessed against the VSC daylight methodology, and the 69 windows that would not meet criteria which would comprise:

- The majority of windows would experience minor impacts with a total of 34 windows experiencing a VSC alteration between 20.1% - 30%,
- A total of 24 windows would experience more moderate alterations between 30.1% - 40%,
- The remaining 11 windows would experience major VSC alterations in excess of 40%.

603. Of the 35 windows experiencing moderate and major impacts, 16 windows appear to serve bedrooms, which are recognised as having a lower requirement for light compared to other uses. The BRE Guidelines note that "... bedrooms should also be analysed although they are less important". In addition, half of these rooms are served by three windows each therefore are considered to receive additional light.

604. The 19 windows remaining experiencing moderate to major impacts, these appear to serve nine living spaces, all of which are multi-glazed (aside from one kitchen) having two or three windows and therefore are considered to receive additional light. In addition, of these nine living spaces, five experience moderate impacts to windows with two of these rooms served by windows with minor impacts. Although these 19 living spaces are not BRE-compliant, this is already the case in the existing condition due to the surrounding levels of existing obstruction. In addition, the absolute changes in the VSCs recorded for these living room windows are considered small (between c. 1.5%-6%, avg.

3%), which translate into high percentage changes due to the low existing values. This applies for all the windows which do not comply with BRE, as the absolute alterations would be considered to be small (between c. 1% and 6%, avg. 2.6%).

605. For NSL, 69 of the 89 (78%) rooms meet criteria for this assessment, and for the 20 rooms which did not meet BRE, these comprise:

- Nine rooms would experience NSL alterations between 20.1%-29.9%
- Four rooms would experience alterations between 30.1%-39.9%
- The remaining seven rooms experience NSL alterations in excess of 40% however four of these consist of bedrooms which are considered less sensitive for the assessment.

606. The east elevation of Pemberton House has a very narrow separation distance from the Site, therefore it is considered that any significant development on Site would result in greater impacts to daylight and many windows have low daylight levels in the existing scenarios. However, it is noted in the assessment that the apartments served by the windows in this façade are all dual-aspect.

607. The CBDM results demonstrate that many of the single-aspect habitable rooms within Pemberton House were already below the suggested lux target for their respective uses in the existing scenario. Therefore it is considered that there is unlikely to be a material change in quality of light within the rooms.

608. Pemberton House is the only neighbouring property that has windows orientated within 90° due south of the Site and relevant for sunlight assessment. A total of 61 out of 65 (94%) windows meeting BRE criteria for annual sunlight. The four affected windows have low existing annual sunlight levels between 6%-7% (against a BRE target value of 25%) which are further reduced to between 0%-1%. The impacted windows serve rooms that are multi-aspect.

609. All windows assessed will meet BRE criteria for winter sunlight.

610. Considering the impacts against the contextual factors summarised above, the impacts to and retained levels of daylight and sunlight are commensurate of what would be experienced within a dense urban environment.

7 Wine Office Court

611. A residential property directly to the south-west of the Site. City records show six properties at this address.

612. A total of 21 windows have been assessed against the VSC daylight methodology, 17 of which will meet BRE criteria for this assessment (81%). The four windows, affecting three rooms, experience minor VSC alterations between 20.1%-30%. All four windows have low existing VSC levels between 2.57% and 3.12% (against a BRE target value of 27%) with that absolute VSC value reducing no more than 1% in the proposed scenario. In addition, two of the three rooms are served by two windows therefore considered to receive additional light, with one of these other windows as BRE compliant.
613. For NSL, one room on the fourth floor will experience a minor NSL alteration of 23.98% (against a BRE target value of 20%). The remaining three rooms located on basement level (identified as a bedroom), third floor and fourth floor experience more moderate NSL alterations between 32.32% and 34.92%. However it is considered that the rooms have low existing NSL values between 6.3% and 14.7% which are reduced to between 4.1% and 9.8% in the proposed scenario.
614. There are no windows within 7 Wine Office Court that face within 90° due south of the development site relevant for sunlight assessment.
615. Therefore, given that the impacted windows and rooms have low existing levels of daylight and alterations are considered disproportionate to the actual impact, the impacts are considered acceptable.

1-12 Bolt Court

616. All windows meet BRE criteria for VSC. One room falls short of guidance for NSL, experiencing a minor alteration of 24.49% (against a BRE target value of 20%) however it is noted that the windows for the VSC are BRE compliant for this room.
617. The affected window serving this space is setback within eaves of the roof, therefore blinkered by the projection of the roof all along one side which would limit the available light.
618. There are no windows within 1-23 Bolt Court that face within 90° due south of the development site relevant for sunlight assessment.
619. Given that all of the windows assessed against the VSC daylight methodology fully meet BRE criteria and one room experiences a minor alteration to NSL, the impacts are considered acceptable.

Overshadowing

620. Overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG). The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces.
621. The assessment considers seven separate amenity areas to the west of the Site in the existing scenario. The assessment shows that sunlight received will satisfy the BRE guidance for all existing amenity areas considered. Therefore these spaces experience no change in the proposed scenario. Therefore the potential effect on overshadowing from the proposed development is considered acceptable.

Daylight, sunlight and overshadowing conclusion

622. With regard to impacts on daylight and sunlight to nearby residential properties, for Pemberton House, 7 Wine Office Court and 1-23 Bolt Court, these would experience Minor to Major Adverse effects. Despite failures against the BRE guidelines, it is not considered that the proposal would result in an unacceptable impact on the existing use of the properties in the context of the location of the site in a dense urban area. In addition, an independent review was undertaken for the results that concluded that the results are not considered unacceptable in the urban context. As such, the impacts are considered to be such that to cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE7 of the draft City Plan 2040.

Solar Glare

623. Policy D8 of the London Plan, Local Plan policy DM10.1 and draft City Plan 2040 policies DE7 and DE2 require development to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.
624. A Solar Glare Assessment has been submitted. It states that occurrences of solar glare at angles beyond 30 degrees would be of little significance in most situations and if the angle between the driver's line of view and the reflected sun is less than 10 degrees, solar glare could be a significant issue.
625. Eleven viewpoints were tested. The analysis states that the likelihood of experiencing solar glare throughout the year is relatively minimal, and even in cases where it does occur, it is at angles greater than 30 degrees

626. Therefore the solar glare impacts of the development are considered to be acceptable.

Overlooking, Privacy, Outlook and Overbearing Impact

627. Policy DM 21.3 of the Local Plan requires all development to be designed to avoid overlooking and seek to protect the privacy to adjacent residential occupiers. The same is reiterated in Policy HS3 of the draft City Plan.

628. The site is located in close proximity to residential units. The south and west elevations are next to residential units at Pemberton House. Comments received from the public at highlighted concerns with overlooking to residential properties.

629. The applicant has confirmed that there would be no new overlooking or direct sightlines created and has proposed design measures to address this issue including curved fins, setting the terraces at an angle to residential windows and for the facade that opens onto the terraces to be set back further than the existing building line thereby increasing the separation distance. In addition, the applicant has confirmed that the development would maintain the same existing floorplate misalignment with Pemberton House.

630. It is considered that the windows on this elevation would directly overlook onto the nearby residential units and it is therefore considered reasonable that a condition is imposed for details to be submitted for these windows and nearby office terraces to prevent privacy and overlooking issues.

631. Therefore subject to conditions, it is not considered that the development would result in a greater overbearing impact or unacceptable level of loss of outlook to nearby residential properties.

Wind Microclimate

632. Policies DM10.1 of the Local Plan 2015, Policy S8 of the draft City Plan 2040 and Policy D8 of the London Plan seek to optimise wind conditions in and around development sites. The design of development should avoid unacceptable wind conditions.

633. Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. In addition, Computational Fluid Dynamics (CFD) simulation and analysis has been carried out in accordance with the City of London's Planning Advice Note, Wind Microclimatic Guidelines for Developments in the City of London.

634. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being 5 Comfort Categories defining suitable conditions for frequent sitting, occasional sitting, standing, walking and uncomfortable.
635. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
636. Assessments have been carried out for both the windiest season and the summers seasons.
637. In considering significance and the need for mitigation measures, if resulting on-site wind condition are identified as being unsafe or unsuitable in terms of the intended pedestrian use then mitigation is required. For off-site measurement locations, mitigation is required in the case that conditions become unsafe or unsuitable for the intended use as result of development. If wind conditions become windier but remain in a category suitable for intended use, or if there is negligible or beneficial effect, wind mitigation is not required.
638. The wind tunnel and CFD results broadly give the same assessment results. Where there is variance, this would be by one category and in either category the condition would remain suitable to use. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessment is to give the broadest picture and to ensure that in either test the conditions are acceptable.

CFD Analysis

639. For the computational analysis, four scenarios have been tested:
1. Existing site with existing surrounding buildings;
 2. Proposed development with existing surrounding buildings;
 3. Proposed development with the cumulative schemes;
 4. Proposed development with proposed landscaping and existing surrounding buildings.

CFD Scenario 1

640. For scenario '1', or the 'baseline' condition, the existing site with existing surrounds the conditions in assessment are shown as suitable for frequent sitting, occasional sitting and standing around the site with walking conditions to the north-east.

641. All thoroughfares and pedestrian crossings are suitable for walking or calmer during windiest season. Off-site entrances are suitable for either frequent sitting, occasional sitting or standing in windiest season.

642. For amenity spaces near to site:

- New Street Square benches - these are suitable for mixture of occasional sitting and standing in summer, which is considered to range between suitable and one category windier than the target condition.
- Gough Square benches – these are suitable for frequent sitting in summer, meeting the target condition.
- For the benches identified at 1 New Street Square, 120 Fleet Street, Stonecutter Street benches – these are suitable for standing in summer, which is one category windier than target condition.

643. For terraces serving a mix of uses of residential and commercial near to the site:

- 120 Fleet Street – this is suitable for a mixture of standing and walking in summer. This is one to two categories windier than the target condition, however has been tested in the absence of any landscaping or mitigation measures.
- Stonecutter Court – this is suitable for a mixture of occasional sitting and standing in summer which satisfies the target condition.
- 1 New Street Square – this is suitable for a mixture of occasional sitting and standing in summer, meeting the target condition.
- Plumtree Court – these is suitable for standing in summer. This is one category windier than the target condition, however this has been tested in the absence of any landscaping or mitigation measures on this terrace.
- 3A New Street Square - this is suitable for occasional sitting in summer which satisfies the target condition.
- Pemberton House – this is suitable for a mix of frequent sitting and occasional sitting in summer which satisfies the target condition.
- Boswell House – this is suitable for frequent sitting in summer which satisfies the target condition.

644. There are no instances of strong winds around the existing site.

645. Therefore, in the existing condition there are some areas which show windier categories (standing) than targeted for these areas.

CFD Scenario 2

646. For Scenario '2' tests the proposed development which existing surrounding buildings. From the baseline condition, the addition of the proposed

development would slightly increase the windiness on Little New Street to north of site however would also decrease the windiest on Shoe Lane and Stonecutter Court to the north-east of the site.

647. All thoroughfares and pedestrian crossings are considered suitable for walking or calmer during the windiest season which satisfies the target condition.

648. For on Site entrances, conditions are suitable for either frequent sitting, occasional sitting or standing in the windiest season. This satisfies the target condition. For off-site entrances, conditions are suitable for either frequent sitting, occasional sitting or standing in the windiest season. This satisfies the target condition.

649. For amenity spaces near to site:

- For onsite benches proposed – for the main entrance lobby these are suitable for frequent sitting or in summer, and for Gunpowder Square are suitable for mixture of frequent sitting and occasional sitting which satisfies target condition. For the proposed benches next to auditorium / gym use are suitable for standing in summer which is one category windier than the target condition, with mitigation proposed by the applicant, discussed further in the report.
- New Street Square benches – are suitable for a mixture of occasional sitting and standing in summer. This ranges between suitable and one category windier than the target condition, but is consistent with the baseline conditions therefore not considered attributable to the proposed development.
- Gough Square benches – are suitable for frequent sitting in summer. This satisfies the target condition.
- For the benches identified at 1 New Street Square, 120 Fleet Street, Stonecutter Street benches – these are suitable for occasional sitting in summer which satisfies the target condition, having been a category too windy in the baseline, and is a beneficial impact of the proposed development.

650. For 120 Fleet Street, there is a small area shown to the north of building on the western elevation for uncomfortable conditions shown in the windiest season only. This is shown on the façade of the proposed retail unit to the side of the entrance. The consultant states there is a highly localised region of red “uncomfortable” conditions does not extend more than 500mm from the wall of 120 Fleet Street, so is not of sufficient extent to impact the pedestrian experience in this area and is therefore considered negligible. This region was picked up in the CFD analysis, but was not picked up by the wind tunnel testing due to being such a localised region that it fell between probe locations.

Therefore subject to condition and s106 obligation, this is considered acceptable.

651. For terraces servicing a mix of uses on-site and for residential and commercial near to the site:

- On site:
 - All proposed terraces up to level 14 are suitable for a mixture of frequent sitting, occasional sitting and standing in summer (with the regions which are suitable for standing not so extensive as to impact the general usability of the terrace). This satisfies the target condition.
 - Conditions for the level 15 and 16 terraces are suitable for a mixture of occasional sitting, standing and walking in summer. The regions which are suitable for walking are a category windier than the target condition, and sufficiently extensive that they would impact the usability of the terrace. Mitigation is discussed further in report.
 - Conditions for the level 17 terrace are suitable for a mixture of standing and walking in summer. This is one to two categories windier than the target condition. Mitigation is discussed further in the report.
 - Conditions for the level 18 terrace are suitable for a mixture of occasional sitting and standing in summer. This satisfies the target condition.
- Off site:
 - 120 Fleet Street – suitable for a mixture of standing and walking in summer. This is one to two categories windier than the target condition, however is consistent with the baseline conditions so is not considered to be attributable to the proposed development.
 - Stonecutter Court – suitable for a mixture of occasional sitting and standing in summer. This satisfies the target condition.
 - 1 New Street Square - is suitable for a mix of occasional sitting and standing in summer. This satisfies the target condition.
 - Plumtree Court – this is suitable for standing in summer. This is one category windier than the target condition, however is considered consistent with the baseline conditions therefore not attributable to the proposed development.
 - 3A New Street Square – is suitable for occasional sitting in summer. This satisfies the target condition.
 - Pemberton House – is suitable for a mix of frequent sitting and occasional sitting in summer. This satisfies the target condition.
 - Boswell House – is suitable for frequent sitting in summer. This satisfies the target condition.

652. There are no instances of strong winds around the proposed development and the surrounding area.

CFD Scenario 3

653. The comfort levels recorded are not materially different to those for Configuration 2 (proposed development with Existing Surrounds). This applies to all thoroughfares, on-site entrances, off-site entrances, on-site benches, off-site benches, proposed amenity terraces and off-site amenity terraces.
654. There are no instances of strong winds around the proposed development and nearby surrounding area.

CFD Scenario 4

655. This scenario has tested the proposed landscaping with the proposed development. The proposed landscaping has only been tested with the existing surrounds, as there are no material differences between conditions with existing and cumulative surrounds, so the impact of the landscaping will be consistent for either existing or cumulative.
656. For ground floor amenity spaces near to site:
- On-Site
 - The proposed benches by the flexible gym/ auditorium entrance are suitable for occasional sitting in summer. This now satisfies the target condition.
657. For amenity (Terraces) spaces near to site:
- On-Site
 - Conditions for the level 15 and 16 terraces are suitable for a mixture of frequent sitting, occasional sitting and standing in summer. There is a highly localised region of walking on the level 16 terrace, however this is not considered sufficiently extensive to impact the usability of the terrace. These terraces would now satisfy the target condition.
 - Conditions for the level 17 terrace are suitable for a mixture of occasional sitting and standing in summer. This now satisfies the target condition for a mixed use terrace. It should be noted that level 17 is proposed to include a restaurant, and as such there may also be a requirement for spill-out seating on this terrace. If so, the target condition would be frequent sitting. This could be achieved by the inclusion of screening (oriented radially across the terrace) adjacent to any spill out seating areas. The precise design and location of these screens would be dependent on the detailed design of the terrace.
658. There are no instances of strong winds around the proposed development and the surrounding area.

CFD Analysis Conclusion

659. No wind safety risks were identified associated with the proposed development.
660. Conditions will be either suitable for the intended use or no windier for the baseline conditions, without landscaping or mitigation measures, for all thoroughfares, building entrances (both proposed and existing off-site), existing off-site amenity (both ground level and elevated terraces), the proposed benches by the main entrance lobby, the proposed benches in Gunpowder Square, and the majority of the proposed elevated terraces (up to level 14, plus level 18).
661. Baseline conditions which are unsuitable will be made suitable by the proposed development for existing benches adjacent to 1 New Street Square and 120 Fleet Street, and on Stonecutter Street.
662. Conditions for the proposed level 15 and 16 terraces would have regions which are not suitable when tested without the proposed landscaping, however would be made suitable by the inclusion of the proposed landscaping scheme.
663. The inclusion of cumulative schemes will not have a material impact on conditions for either the site or surrounding area, including all thoroughfares, entrances and amenity spaces.
664. Conditions for the proposed level 17 terrace would not be suitable when tested without the proposed landscaping, but would be made suitable for use as a mixed-amenity terrace by the inclusion of the proposed landscaping scheme. The assessment states that should spill-out restaurant seating be required in detailed design, it is recommended that screening is incorporated into the terrace design at that stage. This could be secured by an appropriately worded detailed landscaping condition.
665. Conditions for the proposed bench outside the flexible gym/auditorium entrance would be a category windier than the target without the proposed landscaping, however would be made suitable with the inclusion of the proposed landscaping scheme.
666. For 120 Fleet Street, there is a small area shown to the north of building on the western elevation for uncomfortable conditions shown in the windiest season only. This is shown on the façade of the proposed retail unit to the side of the entrance. The consultant states there is a highly localised region of red “uncomfortable” conditions does not extend more than 500mm from the wall of

120 Fleet Street, so is not of sufficient extent to impact the pedestrian experience in this area and is therefore considered negligible. This region was picked up in the CFD analysis, but was not picked up by the wind tunnel testing due to being such a localised region that it fell between probe locations.

667. Therefore subject to condition and s106 obligation, this is considered acceptable.

Wind Tunnel Analysis

668. Wind tunnel tests were conducted on a 1:300 scale model of the proposed development. Measurements were taken at up to 260 locations for 36 wind directions, in 10° increments. For the Wind Tunnel testing, five scenarios have been tested:

1. Existing site with existing surrounding buildings;
2. Proposed development with existing surrounding buildings;
3. Proposed development with cumulative surrounding buildings;
4. Proposed development with existing surrounding buildings with existing and proposed landscaping;
5. Proposed development with cumulative surrounding buildings and existing and proposed landscaping.

669. There would be no occurrences of strong winds at ground level and elevated levels within the configurations tested.

Wind Tunnel Scenario 1 (existing conditions)

670. For Pedestrian Comfort, the baseline scenario indicates that wind conditions around the Site range from suitable for frequent sitting to walking use during the windiest season. Windier walking use conditions occur at the intersection of Shoe Lane, Stonecutter Street, St Bride Street and Little New Street. During the summer season, wind conditions are calmer, due to the lower wind speeds and frequency associated with this period of the year. The wind microclimate is generally calm on-Site and in the nearby surrounding area due to the Existing Site being similar in height to that of the nearby surrounding buildings, which provide beneficial shelter.

671. For Pedestrian thoroughfares on-Site and in the nearby surrounding area would have wind conditions ranging from frequent sitting to walking use during the windiest season.

672. For Entrances on-Site and in the nearby surrounding area would have wind conditions ranging from frequent sitting to walking use in the windiest season.

673. For existing ground level seating areas have wind conditions ranging from frequent sitting to standing use during the summer season.
674. For off-Site roof level amenity spaces have wind conditions ranging from frequent sitting to standing use during the summer season.
675. Off-Site roof level seating areas have occasional sitting use wind conditions during the summer season.
676. There are no areas on-Site or in the nearby surrounding area that have instances of strong winds exceeding the 15m/s safety threshold for more than 0.022% of the time annually.

Wind Tunnel Scenario 2 (Proposed development with existing surrounding buildings)

677. For Pedestrian Comfort, with the introduction of the proposed development, wind conditions would range from frequent sitting to walking use during the windiest season. The proposed development would provide shelter from the prevailing south-westerly winds to the nearby surrounding mis-rise buildings, reducing windiness at the intersection of Shoe Lane, Stonecutter Street, St Bride Street and Little New Street.
678. For Pedestrian thoroughfares on-Site and in the nearby surrounding areas would have wind conditions ranging from frequent sitting to walking use during the windiest season, suitable for the intended use and mitigation measures would not be required.
679. For Entrances on-Site and in the nearby surrounding areas would have wind conditions ranging from frequent sitting to standing use during the windiest season, suitable for the intended use and mitigation measures would not be required.
680. For Ground Level Amenity Seating, the majority of proposed ground level seating (benches) would have wind conditions suitable for frequent sitting or occasional sitting use during the summer season. This would be suitable for the intended use. One bench location by the entrance to the gym/auditorium would have standing use wind conditions during the summer season, which would be one category windier than suitable and mitigation measures would be required.
681. Off-Site ground level seating areas would have wind conditions ranging from being suitable for frequent sitting to standing use during the summer season. Windier than desired standing use wind conditions would occur in the baseline

scenario and it is not considered this would be a result of the introduction of the proposed development.

682. For Roof Level Amenity - all locations on the terraces of the proposed development are designated as mixed use, as seating configurations had not been decided at the time of wind tunnel testing. Terrace locations on the proposed development would have wind conditions ranging from frequent sitting to standing use during the summer season. Standing use conditions would be one category windier than suitable for amenity terrace use. Therefore, mitigation measures would be required.
683. For Off-Site roof level amenity spaces, these have wind conditions ranging from frequent sitting to standing use during the summer season. The introduction of the proposed development would increase windiness at terraces to the north of the Site. However, no seating areas have been identified.
684. Off-Site roof level seating areas, these have occasional sitting use wind conditions during the summer season, suitable for the intended use and mitigation measures would not be required.
685. There would be no locations on-Site or in the nearby surrounding area of the Site that have instances of strong winds exceeding the 15m/s safety threshold for more than 0.022% of the time annually.

Wind Tunnel Scenario 3 (Proposed development with cumulative surrounding buildings)

686. This configuration includes the Thavies Inn House (21/00885/FULMAJ) cumulative development that has been identified within 450m of the proposed development.
687. For Pedestrian Comfort, due to the location of the cumulative scheme being to the north-west of the proposed development, i.e., not in the prevailing wind direction, it would have little effect on the wind microclimate on-Site and in the nearby surrounding area at and around the proposed development. Overall, with wind conditions being materially the same as those reported in Configuration 2.
688. Consistent with Configuration 2, there would be no instances of strong winds exceeding the 15m/s safety threshold for more than 0.022% of the time annually.

Wind Tunnel Scenario 4 (Proposed development with existing surrounding buildings with existing and proposed landscaping)

689. For Pedestrian Comfort, overall the introduction of the proposed and existing landscaping would result in calmer wind conditions across the Site. All ground level locations would now have wind conditions suitable for the intended use or similar to those reported in the baseline scenario (Configuration 1).
690. for Ground Level Amenity – the introduction of landscaping at the ground level would result in calmer wind conditions at the seating by the gym/auditorium entrance, with occasional sitting use wind conditions during the summer season, suitable for the intended use. No further mitigation would be required.
691. For Roof Level Amenity – At the terrace levels, the introduction of landscaping would lead to an overall reduction in windiness. Locations with standing use conditions in the summer season in Configuration 2 would no longer persist. However, there would be four with standing use conditions during the summer season. Mitigation measures to achieve calmer conditions at these locations have been recommended.
692. There would be no ground or elevated level locations on-Site or in the nearby surrounding area of the Site which would have instances of strong winds exceeding the 15m/s safety threshold for more than 0.022% of the time annually.

Wind Tunnel Scenario 5 (Proposed development with cumulative surrounding buildings and existing and proposed landscaping)

693. For Pedestrian Comfort, wind conditions would not materially change from those reported in Configuration 4.
694. There would be no ground or elevated level locations on-Site and in the nearby surrounding area of the Site which would have instances of strong winds exceeding the 15m/s safety threshold for more than 0.022% of the time annually.

Wind Tunnel mitigation measures

695. Seating areas on terraces on the proposed development should be located in areas with wind conditions suitable for frequent sitting or occasional sitting use. Outdoor dining areas, or seating where long-term sitting is expected should be located in areas with frequent sitting use conditions. Benches or seating where short-term sitting is expected can be located in areas with frequent sitting or occasional sitting use conditions.

696. Therefore, mitigation would be required on the higher-level terraces to achieve sitting use conditions if they are expected to be used for seating.

697. Overall, the majority of ground and elevated levels on-Site and in the nearby surrounding area would have suitable wind conditions for the intended uses. However, the elevated terraces of the proposed development would have wind conditions windier than desired for amenity use (locations on terraces 16 and 17). Mitigation measures have been suggested in the report to help improve conditions to be more suitable for the desired amenity uses, which are based on RWDI's experience of similar schemes:

- Increase balustrade height to 2-2.5m tall at Level 16 and 17 terraces;
- A number of 2m tall, 50% porous screens spread across the Level 16 and 17 terraces, perpendicular to the façade of the building;
- 1.2m tall dense planting/hedging/screening around Level 17 restaurant seating areas (fixed or moveable);
- Additional 3m tall trees (deciduous or evergreen) in acceptable areas on Level 16 and 17 terraces; and/or
- At least 50% porous pergola structure to cover Level 17 restaurant seating area, with porous or solid side screens integrated.

698. Based on RWDI's previous experience, with these mitigation measures in place it is expected that wind conditions would be suitable for the desired amenity uses.

Wind Microclimate Conclusion

699. Conditions in and around the site fulfil the wind safety criteria after the introduction of the proposed development and are also comfortable for intended uses, with some exceptions at terraces and balconies and wind mitigation is recommended, which should make conditions acceptable.

700. Overall, the wind microclimate impact of the proposed development is considered acceptable. A Wind Audit would be secured in the S106 Agreement which would require a post-completion audit to assess and compare the results in the Wind Tunnel test against the result of wind speed assessment carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the wind tunnel tests and CFD.

701. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with London Plan Policy D8, Local Plan Policy DM10.1 and draft City Plan policies S8 and DE2, and

the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

Thermal Comfort Assessment

702. London Plan Policy D8 and D9 and the emerging City Plan 2040 Policy S8 indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings - wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.
703. In accordance with the City of London Thermal Comfort Guidelines an outdoor thermal comfort assessment has been prepared. The technique involves merging the effects of wind, air temperature, humidity and solar radiation data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.
704. The Universal Thermal Climate Index (UTCI) categories have been modified for the City of London developments. The usage categories for thermal comfort is set out below and is used to define the categorization of a given location:

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

705. Three configurations have been assessed including the following.

- Configuration 1: existing site with existing surroundings (the baseline);
- Configuration 2: proposed development with existing surrounding;
- Configuration 3: proposed development with cumulative consented schemes in the surrounding
- Configuration 4: the proposed development with proposed landscaping and existing surrounding buildings.

706. The following consented schemes are considered sufficiently advanced to be included in the baseline surrounds (configurations 1 and 2):

- 120 Fleet Street (21/00538/FULEIA)
- Stonecutter Court (18/00878/FULMAJ)
- 100 And 108 Fetter Lane (21/00534/FULMAJ)
- Land Bounded By Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street (20/00997/FULEIA)
- 61 - 65 Holborn Viaduct (21/00781/FULMAJ)
- 14-21 Holborn Viaduct (21/00755/FULMAJ)
- Morley House (17/00165/FULMAJ)

707. Thavies Inn House 3 - 4 Holborn Circus (21/00885/FULMAJ) has also been included in the cumulative surrounds (Configuration 3).

708. Conditions will be either suitable for the intended use or no worse than the baseline conditions, without landscaping or mitigation measures, for all building entrances (both proposed and existing off-site), existing off-site amenity (both ground level and elevated terraces), the proposed benches by the main office lobby, the proposed benches in Gunpowder Square, and the

majority of the proposed elevated terraces (up to level 14).

709. Baseline conditions which are unsuitable will be made suitable by the proposed development for existing benches adjacent to 1 New Street Square.

710. Conditions for the proposed bench outside the flexible gym/auditorium entrance would be a category above the target without the proposed landscaping, however would be made suitable for the inclusion of the proposed landscaping scheme.

711. The proposed level 15 to 18 terraces would have regions which are suitable for short-term use (which is a category above the target condition). The extent of these regions is reduced by the inclusion of the proposed landscaping, and the entirety of the terraces would have over 90% acceptable thermal comfort levels from April to October inclusive.

712. The inclusion of cumulative schemes will not have a material impact on conditions.

Thermal Comfort Conclusion

713. The simulations indicate that thermal comfort conditions are suitable for their intended uses.

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

Light Pollution

715. Local Plan Policy DM15.7 and draft City Plan 2040 policy DE8 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.

716. The Lighting SPD 2023, requires that a Lighting Strategy and Lighting Concept are submitted at application stage. A Lighting Strategy has been submitted with the application. It is noted that this application was submitted prior to the adoption of the Lighting SPD and therefore the full documents do not accompany the application. To ensure that appropriate lighting levels are achieved externally and internally and to mitigate impacts of public realm and nearby residential properties, it is considered pertinent that a condition for the submission of relevant details of a Lighting Concept and Technical Lighting

Design are submitted for approval and must include mitigation for impacts to nearby residential uses. This will have to be submitted prior to the relevant works for the building and the details shall accord with the requirements as set out in the Lighting SPD, including but not limited to details of all external lighting and internal lighting visible from the public realm or which could impact to residential amenity and the environment.

717. The Environmental Impact Assessment states there are sensitive receptors at Pemberton House including bedrooms which face towards the Site. An assessment of the likely significant light intrusion effects of the proposed development was therefore undertaken using computer modelling software to establish how the predicted levels of light intrusion from the proposed development at these nearby bedroom windows.
718. The assessment states that the temporary lighting used on the Site during the demolition and construction works will have fewer effects compared to the completed proposed development.
719. The applicant confirmed that measures to minimise light spill and glare will be adopted during the works where required, including use of baffles / shields, directional lighting and advanced notice / prior notification of works that will require construction lighting in proximity to sensitive receptors and post-installation checks, to ensure that any temporary lighting is suitably controlled and that these measures will be included in the Construction Environmental Management Plan.
720. Overall, the assessment found that light intrusion effects arising from the proposed development are of moderate to major adverse significance. However the assessment assumed a 'typical' lighting design and also assumed that all lights are switched on at the same time and no blinds or shading devices are installed. It also assumed that all lights remain on after 11pm.
721. Therefore the assessment states that this represents a reasonable worst case scenario and the effects are likely to be materially lower in reality when one takes into account of a mitigation scheme that would be deployed as part of good building management practices.
722. The applicant states that the lighting will be designed wherever possible to comply with the Institute of Lighting Professionals Guidelines and to reduce the potential effects on residents of Pemberton House, such that the likely effect of the proposed development after mitigation will likely be minor adverse and therefore not significant.

723. A condition is recommended to ensure that impacts to residents and other sensitive receptors are mitigated including compliance with the Lighting SPD.

Air quality

724. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all development to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI of the London Plan.

725. This report presents the findings of the assessment, which addresses the potential air quality impacts during both the construction and operational stages of the proposed development. The assessment states the proposed development is air quality neutral.

726. A qualitative assessment of construction phase impacts has been carried out. There is a Medium risk of dust soiling and Low risk of fugitive PM10 emissions during the demolition, earthworks, construction and trackout phases. Through good site practice, the implementation of suitable mitigation measures, the impact of dust and PM10 releases will be minimised. The assessment states that the residual effect of the construction phase on air quality is therefore not considered significant.

727. A qualitative assessment of odour emissions has been carried out to consider potential emissions from the Restaurant. A small source of odour potential with a highly effective pathway was identified. The risk of odour exposure for the existing receptors in the vicinity of the Site was found to be Low risk.

728. As the road traffic generated by the proposed development does not breach the threshold detailed in the IAQM and EPUK Air Quality Planning Guidance (See Table 3.7) and there is no on-site combustion plant proposed for the provision of heating and hot water, detailed dispersion modelling was scoped out of the assessment.

729. The proposed development incorporates Air Source Heat Pumps providing heating and cooling, water-to-water heat pumps providing DHW, with heat recovery, and photovoltaics on the roof. While the sustainability report states the proposed development is an all-electric scheme and does not incorporate

any on-site combustion plant such as combined heat and power (CHP) and boilers, it does however include a back-up diesel fired generator for life-safety purposes.

730. The Air Quality Impact Assessment states that the back up emergency generator is excluded from specified generator controls of the Medium Combustion Plant Directive (MCPD), however as it has a capacity of over 1MW it will require a MCP permit by the appropriate deadline.

731. The City's Air Quality Officer has raised no objection subject to conditions including for generators, combustion flues, and Non-Road Mobile Machinery Register.

732. 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 2040 and SI 1 of the London Plan which all seek to improve air quality.

Noise and Vibration

733. 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.

734. 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. The assessment also includes an assessment of breakout noise from the proposed uses.

735. Generally, in City redevelopment schemes, most noise and vibration issues occur during demolition and early construction phases. Noise and vibration mitigation, including control over working hours, types of equipment used, would be included in Schemes of protective works for Demolition and Construction Logistics Plan to be approved by condition. Concerns have been raised from the nearby residents regarding noise and dust during construction.

736. The Environmental Health team have been consulted and have recommended conditions to ensure that the residential amenity of the neighbouring occupiers is preserved.

737. Subject to the proposed conditions, the proposals would comply with London Plan Policy D13 and D14, Local Plan Policy DM15.7 and draft City Plan 2040 Policy HL3.

Health Impact Assessment

738. Policy HL9 of the draft City Plan 2040 requires major developments to submit a Healthy City Plan Checklist to assess potential health impacts resulting from proposed developments.

739. Policy GG3 of the London Plan states that *“To improve Londoners’ health and reduce health inequalities, those involved in planning and development must: assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments”*.

740. The applicants have submitted a Health Impact Assessment (HIA) assessing whether effects identified in other relevant technical assessments submitted as part of the application would result in health effects.

741. In evaluating the health impacts of the proposed development, the HIA has addressed the 42 questions raised by the CoL HIA checklist.

742. In summary, positive health impacts namely relate to:

- Provision of new jobs associated with an increase in commercial floorspace, supporting local employment opportunities
- Enhancements to public realm creating a safer and more accessible environment.
- Location of the Site is able to support active and public transport use.
- Enhancement to the existing library to provide a new offering to residents and visitors, along with benefits to local organisations who can utilise meeting spaces and resources of the library.
- Emphasis on sustainable development during both the construction and operation of the building.
- Being a car-free development, minimising vehicles travelling to the Site and reducing emissions to improve local air quality
- Considerations of inclusive design principles.

743. Across the 42 questions, 10 criteria were considered to not be relevant to the proposed development. Of the remaining 32 criteria, the proposed development is anticipated to have the following health impacts: 29 positive

impacts; 3 neutral impacts; and no negative impact (with a neutral residual impact following mitigation measures).

744. It is considered that any potential negative impacts would need to be mitigated during the demolition, construction and operational phases, for example by employment of a scheme for protecting nearby residents from noise, dust and other environmental effects to mitigate dust emissions and address any adverse amenity impacts arising from demolition and construction. It is therefore considered that the impacts would be mitigated so far as possible by the requirements of relevant conditions and S106 obligations.

745. Overall, it is considered that the development seeks to improve the health and addresses health inequalities. The residual impact would be acceptable, and the proposals would comply with London Plan policy GG3 and draft City Plan 2040 policy S1.

Safety and Security

746. The application is supported by a Security Needs Assessment. Through the assessment the specific risks to the proposal have been identified and security improvements have been recommended.

747. The security risk profile of the proposed development is aligned to that of similar mixed retail and commercial office development within the CoL. This assessment did not ascertain any information which suggested that the Applicant's assets specifically, or the immediate area surrounding the Site is being targeted by any particular group although the risk profile of the area will ultimately be influenced by future users, occupants and tenants.

748. This report also outlines a list of security recommendations to mitigate the threats outlined by the security consultant.

749. Further details of the overall security strategy will be required by condition and a Cultural Management Plan secured by S106.

750. The City Police were consulted and confirmed they have met with the security consultant and the Architect on this project and provided feedback to them.

751. The proposal includes terraces at all levels from level 1. The terraces have been designed in line with the City of London Corporation Preventing Suicides in High Rise Buildings and Structures planning advice note. The balustrading of the office terraces is at least 1400 mm which levels 17 and 18 increased to at least 1800mm. However the wind assessment makes further

recommendations to mitigate impacts including an increase balustrade height to 2-2.5m tall at Level 16 and 17 terraces.

752. In addition, the proposed terrace planters are mainly located at the edge of the terraces where there are sheer drop which acts as a deterrent from accessing the edge of the building. The tapering form of the building means that the majority of the accessible terrace balustrading is guarding a single storey change in level. The applicant has confirmed that the planters are set a minimum of 600mm from the balustrade so that these would not provide a step up to the balustrade and maintain a suitable zone for maintenance access.

753. Further detail regarding suicide prevention would be secured via condition.

754. The proposal, subject to conditions and S106 obligations is considered to be in accordance with policy DM3.2 and draft City Plan strategic policy S2 and policies SA1 and SA3.

Fire Statement

755. A Fire Statement has been submitted outlining the fire safety strategy for the building.

756. The City District Surveyor's office has reviewed the submitted fire statement and has raised no objections.

757. It is considered that the statement adequately covers the relevant fire aspects of the design and is in accordance with policies D5 and D12 of the London Plan. The Fire Statement is therefore adequate for the planning stage.

Land contamination

758. Policy DM 15.8 of the Local Plan states that *"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."* The same requirements are also set out in Policy HL4 of the City Plan.

759. The application supported by a Phase 1 Contamination Report and a preliminary qualitative risk assessment and conceptual site model has been produced for the Site, which indicates a low to low/moderate risk to the

identified receptors. The below ground works required as part of the proposed redevelopment of the Site are anticipated to be minimal and related to ground investigation only.

760. The report recommends for this ground investigation including a borehole survey within the existing basement footprint (including validation of the existing foundations), and trial pitting in external areas where soft landscaping is proposed to allow sampling and chemical testing of the shallow soils. The findings of the ground investigation should be presented in a Geotechnical and Geoenvironmental Interpretative Report (GGIR), to inform a subsequent Detailed Foundation Settlement Analysis, which should assess the feasibility and predicted ground movements resulting from the development works.
761. A Preliminary UXO (Unexploded Ordnance) Risk Assessment for the Site indicates a high risk, and therefore further assessment is recommended, in the form of a Detailed UXO Risk Assessment. This assessment would be required prior to completion of the borehole survey (not needed for the trial pits) to determine whether special UXO supervision of the borehole drilling is required; or whether the basement already extends beyond maximum bomb penetration depth (in which case, no further UXO risk-mitigation measures would be required). This is secured by condition.
762. The Environmental Health Officer has been consulted and has suggested the imposition of a condition to submit an investigation and risk assessment to establish if the site is contaminated and to determine the potential for pollution prior to any works except demolition. Where remediation is required this would have to be completed and a verification report to be submitted to the Local Planning Authority for approval.
763. Therefore subject to conditions, this is considered acceptable.

Planning Obligations and Community Infrastructure Levy

764. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
765. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

766. On the 1st of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

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

MCIL2 Calculation

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£5,512,352.84	£5,291,858.73	£220,494.11

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£2,426,017.50	£2,304,716.63	£121,300.88
City Planning Obligations			
Affordable Housing	£1,617,345.00	£1,601,171.55	£16,173.45
Local, Training, Skills and Job Brokerage	£970,407	£960,702.93	£9,704.07
Carbon Reduction Shortfall (as designed) <i>Not indexed</i>	£443,175.00	£443,175.00	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£100,000.00	£100,000.00	£0
Area-Specific Security Mitigation <i>Not indexed</i>	£323,469.00	£320,234.31	£3,234.69
S106 Monitoring Charge (additional Heads of Terms)	£6,250.00	£0.00	£6,250.00
Total liability in accordance with the City of London's policies	£5,886,663.50	£5,730,000.42	£156,663.09

City Planning Obligations

768. The obligations set out below are required in accordance with the CoL's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development to meet the tests under regulation 122 of The Community Infrastructure Levy Regulations 2010 and government policy.

Heads of terms

- Affordable Housing Contribution - £1,601,171.55 (exc. Indexation)
- Local, Training, Skills and Job Brokerage Contribution - £960,702.93 (exc. Indexation)
- Carbon Reduction Shortfall (as designed) - £443,175.00
- Section 278 (Evaluation and Design Fee) - £100,000.00
- Area-Specific Security Mitigation - £320,234.31 (exc. Indexation)
- S106 Monitoring Charge - £35,362.21 (exc. Indexation)
- Highway Reparation and other Highways obligations
- Local Procurement Strategy
- Employment and Skills Plan (Demolition and Construction)
- Delivery and Servicing Management Plan (including Consolidation)
- Travel and Cycle Promotion Plan
- Cycle Hire Contribution - £220,000 (exc. Indexation)
- Cultural, Public Realm and Visitor Management Plan
- Construction Monitoring Costs (£53,820 for First Year of development and £46,460 for subsequent years)
- 'Be Seen' Energy Performance Monitoring
- Utility Connections to the Development
- S278 Agreement (CoL)
- Legible London Contribution (£45,000)
- City Walkway Rescindment Arrangements
- Public Realm Improvements and Access Arrangements
- Relocation of Shoe Lane Library
- New Shoe Lane Library Management Plan
- Decanting Strategy and Lease Arrangements
- Affordable Workspace, Roof Terrace and Cultural Benefits Implementation Strategy
- Affordable Workspace Management Plan
- Affordable Workspace Contribution £90,000 (exc. Indexation)
- Auditorium Management Plan or Gym Management Plan
- Lift and Changing Places Toilet Maintenance Contribution / Maintenance

- Changing Places Toilet Management Plan
- Roof Terrace Management Plan
- Wind Audit Assessment
- Tree planting
- Shoe Lane Library Fallback financial security sum to include:
 - Officer and other associated external staff time from the date of completion of this agreement to the date the Permanent New Library is open to the public for all officer time spent dealing with the relocation of the library,
 - Contact with suppliers to determine early termination costs, disconnection and connection fees, new lease or service agreements and any new equipment cost including internet, phone, cable, utilities, parking, copy machine lease, cleaning, security, vending and other services,
 - Interior design,
 - Project management costs,
 - Removal company costs of packing, transporting, storage and unpacking of stock, furniture, and any other items necessary for the function of the library,
 - preparation of inventories, specifications, and updates,
 - Marketing and notifications of each move,
 - Signage,
 - Consultant costs,
 - Moving insurance,
 - Legal expenses,
 - Identification cost for a suitable new building (as agreed with the City of London) and associated costs of planning permission, architects, agents, lease agreements, utility connection costs and other relevant matters
 - Rent and fit out costs for the period of the lease.

769. The scope of the s278 agreement may include, but is not limited to (subject to evaluation and design work):

- Further analysis for footways as part of the proposed Section 278 works including updated pedestrian counts should be undertaken.
- Gunpowder Square
 - Provision of planters, seating, landscaping and tree planting
 - Reconstruction of the surface/paving
 - Re-location and re-provision of the existing cannon
 - Provision of benches, seating and cycle stands
 - Removal of redundant bollards

- Provision of lighting
 - Provision of public art and heritage interpretation
 - Highways drainage works feasibility study and survey of the ground works and details for the locations and species for trees in Gunpowder Square to ensure that the new trees are deliverable, and to provide at least four trees in Gunpowder Square of species with large canopy and additional trees subject to feasibility, to be agreed with City Gardens Teams including 20 year commuted sum for tree maintenance.
- Wine Office Court
 - Provision of Cycle stands
 - Ramp & access arrangements (maintained by the developer for the lifespan of the development)
 - Provision of lighting
 - Reinstatement of paved areas
 - Removal of redundant bollards
 - Shoe Lane
 - Reinstatement of paved areas
 - Removal of redundant bollards
 - Little New Street
 - Relocation of blue badge parking bays (subject to evaluation and design)
 - Reinstatement of paved areas
 - All locations
 - Installation of all the public realm works within the public highway, as per the planning approval, including implementation of landscaping, trees, planters, planting, seating, installation of public art and any other associated works
 - Repaving of footways
 - Resurfacing of the carriageways at the locations
 - Reinstatement of Road Markings
 - Improvements to drainage
 - Improvements to lighting
 - Improvements to safety per ATZ observations received for the application
 - Removal of bollards
 - Further analysis for footways as part of the proposed Section 278 works including updated pedestrian counts should be undertaken.

770. The applicant has proposed planters with balustrade to accommodate the changes in levels between Shoe Lane and Wine Office Court. The details of its construction will be addressed during the detailed design of the S278 project and subject to feasibility.

771. And any other associated highway works deemed necessary to integrate highways arrangements.

Monitoring and Administrative Costs

772. A 10-year repayment period would be required whereby any unallocated sums would be returned to the applicant 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.

773. 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.

774. It is requested that delegated authority is given to officers to continue to negotiate and agree the terms of the proposed obligations as necessary and enter into the S106 and S278 agreements.

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

775. 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.

776. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation.

777. It is the view of officers that a decision to grant permission, subject to a conditions and section 106 obligations, would remove or minimise disadvantages suffered by persons who suffer from a disability and in particular mobility impairment by providing enhanced and accessible public realm. The provision of an enhanced library and public realm, affordable workspace, and free access to the rooftop for the library and community groups would advance equality of opportunity.

Human Rights Act 1998

778. 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”)).

779. 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, by way of loss of light and noise and disturbance during constructions, it is not considered that 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. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policy DM10.7 and Policies DE7 and DE8 of the draft City Plan 2040. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace contributing to the City’s primary business and professional services function, and the provision of a community/cultural offer and affordable workspace outweighs the adverse impacts on nearby residential properties and that such impact is necessary in the interests of the economic well-being of the country and is proportionate.

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

Conclusions and Overall Planning Balance

781. 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.

782. The scheme would provide a total of 58,411sq.m GEA floorspace, comprising 44,105sq.m of office floorspace providing a significant amount of flexible

Grade A office floorspace, an uplift on the site of both quality and quantity of office floorspace. Therefore, the proposed development would support the strategic objectives of the development plan and the emerging City Plan. The economic benefits of the proposed development would be material and would weigh in favour of the proposed development.

783. The proposed development would also provide retail uses at the site with enhanced active retail frontage. Therefore, the proposal would support the main function of the City and the aims of the development plan to support mixed commercial uses within the office-led development at ground floor to activate street spaces, which would contribute to the City's economy and character and also provide support for the businesses, workers and residents.
784. A total of 49 responses from the public were received. This comprised four objections and two neutral comments which raised residential amenity impacts including for overlooking, daylight and the construction period. Officers have considered these issues and recommended conditions and Section 106 obligations to mitigate impacts. A total of 43 responses supporting the proposals were received, these all state: "I am writing to share my support for the Hill House proposals" with some responses also highlighting support for the rooftop restaurant, new public realm and library proposals.
785. The proposed development would deliver a high quality, energy efficient development that is on track to achieve "outstanding" BREEAM assessment ratings for all uses, in compliance with London Plan policy SI 2, Local Plan policy CS15 as well as Draft City Plan 2040 policy DE1. The proposals cannot meet the London Plan target of 35% operational carbon emission savings compared to a Part L 2021 compliant scheme which the GLA acknowledges will initially be difficult to achieve for commercial schemes. However, the proposed energy efficiency and MEP strategy would perform highly, with an innovative façade system that would provide both operational and embodied carbon efficiency and an additional opportunity to use timber for internal elements.
786. The assessment of options, carried out in compliance with the Carbon Options Guidance 2023, confirmed that although the preferred proposal would result in the highest whole life-cycle carbon emissions out of the 4 options, none of the other options would be able to deliver the holistic sustainability benefits that would complement the repositioning of the emerging Fleet Valley area into a vibrant, healthy and sustainable new part of the City. The planning stage whole life-cycle carbon emissions are calculated to reach close to the GLA's Aspirational Benchmark, and opportunities to maximise the reuse of deconstruction materials from the site and from other reuse sources have been identified to mitigate impacts of redevelopment. The proposal therefore would

satisfy the GLA's circular economy principles and London Plan policy SI 7, Local Plan policy CS15 and DM17.2, and Draft City Plan 2040 policy CE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and various opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and Draft City Plan 2040 policies S14, OS1, OS2, OS3, S15, CR1, CR3.

787. The proposal will result in the loss of City Walkway through the site. Policy DM 16.2 resists the loss of pedestrian routes unless an alternative public pedestrian route of at least an equivalent standard is provided. An alternative route is not proposed by the applicant and therefore there is considered to be some non-compliance with part '2' of this policy. However additional public realm space is to be re-provided around the periphery of the building as part of an enhanced public realm.
788. The pedestrian comfort results indicate that there is to be no change in the pedestrian comfort level of the assessed footways at Little New Street and Shoe Lane and there will be a slight reduction in the pedestrian comfort level for Printer Street from an 'A' to an 'A-', which is considered immaterial and is still within an acceptable and comfortable range. Overall, the public realm works will result in a positive and beneficial impact on pedestrians and users of the space, which would include users not directly associated with the proposed development. However Officers consider that footways should be considered in more detail as part of the proposed Section 278 works including updated pedestrian counts should be undertaken.
789. The proposal would deliver 750 long stay cycle parking spaces and a minimum of 113 short stay spaces, which is London Plan compliant. This is in addition to the reprovision of the existing 24 cycle parking spaces located on Wine Office Court. Therefore the provision is considered to be adequate and improved external short stay parking would be provided.
790. The transport proposals are considered acceptable subject to conditions and section 106 obligations including Construction Logistics Details to mitigate impacts to nearby uses and residents. The works to public highway would be secured through a Section 278 agreement.
791. The Twentieth Century Society objected to the proposals on heritage grounds. Historic England responded to the consultation raising concerns on heritage grounds and identifying harm to heritage assets. In addition, St Paul's Cathedral responded to identify harm to heritage assets.

792. The City's long-term, plan-led approach to tall buildings is to cluster them to minimise heritage impacts and maximise good growth. As such, the adopted Local Plan seeks to consolidate tall buildings into a singular, coherent City Cluster (Local Plan policies CS7 and CS14 (1)), an approach carried forward in the emerging City Plan 2040 with the addition of a smaller proposed Cluster in the Holborn and Fleet Valley area at Policy S12 and S21.
793. The application site falls outside the 'Eastern Cluster/City Cluster' policy areas in the adopted Local Plan and emerging City Plan Policy CS7, but does fall within the proposed Holborn and Fleet Valley Cluster in the emerging City Plan Policy S12. At 94.80m AOD, the proposal would exceed the highest of the contours of the proposed Cluster (90m AOD) by 4.8m and there would therefore be a degree of conflict with emerging policy S12 (3) of the 2040 Plan. The emerging 2040 City Plan has not yet gone through Regulation 19 consultation and as set out is considered to be a material consideration afforded limited weight.
794. It is considered the proposal would conform to the City's plan-led approach as the site is in an area effectively identified by the 2015 Local Plan as appropriate for a tall building and within the emerging City Plan 2040 Policy S12 and notwithstanding the degree of conflict identified with emerging City Plan 2040 policy S12 (3) with regards to height. The proposal is considered to comply with London Plan policy D9 (C) and (D).
795. Officers consider that the architectural design of the building would be compatible with the existing context, being read as a well-layered piece of design, which celebrates moments in the public realm. Officers consider that the sculptural form of the building's massing, which breaks the building down into a series of different elements is successful, and responsive to its context, while also delivering a unique piece of architecture with its own identity and well-articulated facades.
796. Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate employment growth and would increase the amount of high-quality office space. The proposals align with the function of the City to accommodate substantial growth in accordance with Local Plan Policies CS1: Offices and London Plan Policies SD4, SD5 and E1.
797. The architecture and urban design proposals comply with Local Plan Policies CS10 and DM10.1, DM19.1 emerging City Plan Policy S8, DE2, HL1, DE3, and London Plan Policy D3 and D8, paragraphs 130 and 132 of the NPPF and the City Public Realm SPD all require high-quality public realm and increased urban greening.

798. Officers consider that the proposal would preserve all relevant strategic views in accordance with London Plan Policy CS13, City Plan policy S13 London Plan Policy HC4 and associated guidance in the LVMF SPG and Protected View SPD. The proposal would not harm the characteristics and composition of relevant strategic views and their landmark elements.
799. The proposals would preserve the significance (via change in the setting) of heritage assets and an appreciation of it. As such, they would accord with Local Plan policies CS12 and DM12.1, emerging City Plan 2040 policies S11 and HE1, London Plan policy HC1, having accounted for and paying special regard to s.66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant NPPF policies.
800. Two wind assessments were undertaken: a Computational Fluid Dynamics (CFD) and Wind Tunnel. No wind safety risks were identified associated with the proposed development. In both assessments, there would be no locations on-site or in the nearby surrounding area that would have instances of strong winds exceeding the 15m/s safety threshold for more than 0.022% of the time annually.
801. For the wind tunnel, with the inclusion of the proposed development the majority of locations would have wind conditions suitable for the intended use. Bench seating by the gym/auditorium entrance and higher-level terrace locations would have wind conditions one category windier than suitable. With the existing and proposed landscaping in place, all ground level locations would have suitable wind conditions for the intended use and no mitigation would be required. On the terrace levels the majority of areas would have suitable wind conditions for terrace use. However, a number of locations would have wind conditions windier than suitable for amenity use. Mitigation measures have been suggested and with these mitigation measures in place it is expected that wind conditions would be suitable for the desired amenity uses.
802. The CFD found that conditions will be either suitable for the intended use or no windier for the baseline conditions, without landscaping or mitigation measures, for all thoroughfares, building entrances (both proposed and existing off-site), existing off-site amenity (both ground level and elevated terraces), the proposed benches by the main entrance lobby, the proposed benches in Gunpowder Square, and the majority of the proposed elevated terraces (up to level 14, plus level 18). The baseline conditions which are unsuitable will be made suitable by the proposed development for existing benches adjacent to 1 New Street Square and 120 Fleet Street, and on Stonecutter Street. This is a beneficial impact of the proposed development. Conditions for the proposed level 15 and 16 terraces would have regions which

are not suitable when tested without the proposed landscaping, but would be made suitable by the inclusion of the proposed landscaping scheme. Conditions for the proposed level 17 terrace would not be suitable when tested without the proposed landscaping, but would be made suitable for use as a mixed-amenity terrace by the inclusion of the proposed landscaping scheme. Should spill-out restaurant seating be required in detailed design, it is recommended that screening is incorporated into the terrace design at that stage. This could be secured by an appropriately worded detailed landscaping condition. Conditions for the proposed bench outside the flexible gym/auditorium entrance would be a category windier than the target without the proposed landscaping, but would be made suitable with the inclusion of the proposed landscaping scheme.

803. For the CFD, at 120 Fleet Street, there is a small area shown to the north of building on the western elevation for uncomfortable conditions shown in the windiest season only. This is shown on the façade of the proposed retail unit to the side of the entrance. The consultant states there is a highly localised region of red “uncomfortable” conditions does not extend more than 500mm from the wall of 120 Fleet Street, so is not of sufficient extent to impact the pedestrian experience in this area and is therefore considered negligible. This region was picked up in the CFD analysis, but was not picked up by the wind tunnel testing due to being such a localised region that it fell between probe locations.

804. Therefore subject to condition and s106 obligation, the wind microclimate impacts are considered acceptable.

805. With regard to impacts on daylight and sunlight to nearby residential properties, these would experience minor to major adverse effects. Despite failures against the BRE guidelines, it is not considered that the proposal would result in an unacceptable impact on the existing use of the properties in the context of the location of the site in a dense urban area. In addition, an independent review was undertaken for the results that concluded that the results are not considered unacceptable in the urban context. As such, the impacts are considered to be such that to cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE7 of the draft City Plan 2040.

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

807. A Solar Glare Assessment has been submitted. It states that occurrences of solar glare at angles beyond 30 degrees would be of little significance in most

situations and if the angle between the driver's line of view and the reflected sun is less than 10 degrees, solar glare could be a significant issue. The analysis states that the likelihood of experiencing solar glare throughout the year is relatively minimal, and even in cases where it does occur, it is at angles greater than 30 degrees. Therefore impacts are considered acceptable.

808. Local Plan Policy DM15.7 and draft City Plan 2040 policy DE8 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers. An assessment of lighting impacts was undertaken by the applicant and identifies sensitive receptors at Pemberton House including bedrooms which face towards the Site. An assessment of the likely significant light intrusion effects of the proposed development are of moderate to major adverse significance. However the assessment assumed a 'typical' lighting design and also assumed that all lights are switched on at the same time and no blinds or shading devices are installed. It also assumed that all lights remain on after 11pm. Therefore the assessment states that this represents a reasonable worst case scenario and the effects are likely to be materially lower in reality when one takes into account of a mitigation scheme that would be deployed as part of good building management practices.

809. The applicant states that the lighting will be designed to reduce the potential effects on residents of Pemberton House, such that the likely effect of the proposed development after mitigation will likely be minor adverse and therefore not significant. Conditions are recommended to ensure that impacts to residents and other sensitive receptors are mitigated including compliance with the Lighting SPD. Subject to detailed design and conditions, the impacts are considered acceptable.

810. There are a range of benefits associated with the proposal which includes the delivery of:

- An enhanced library offer with potential to generate income from meeting rooms;
- Potential for affordable workspace at the site to be managed by the library to generate income;
- Exclusive managed use of the level 18 amenity space and rooftop for library use and for community events;
- A Changing Places Toilet;
- A flexible gym/ auditorium use with offer for discounted use for qualifying groups and users;
- Public realm improvements including an enhanced Gunpowder Square;
- Provision of public art.

811. The principle of high-quality Grade A office, flexible retail and gym/auditorium floorspace are acceptable and would be secured through condition.
812. It is considered that the proposal would make the best use of land, following a design-led approach that optimises the site's capacity to accommodate growth and attractive office space, in accordance with the Local and London Plan Policies.
813. It is considered the proposal would constitute Good Growth by design in accordance with Local Plan Policies CS 10 and DM 10.1, emerging City Plan Policy S8 and DE2 and London Plan D3, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by the London Plan Good Growth objectives, GG1-6. The proposals would also align with the mandate of Destination City by improving the public realm and creating a new sense of place in this corner of the City of London.
814. Overall, the proposal would optimise the use of land to deliver a transformative new mixed-use destination for the area. It would result in a diverse mix of use, with curated and programmed publicly accessible spaces, both internal and external, and an improved library for the City. It would deliver an enhanced public realm, enhancing convenience, comfort and attractiveness in a manner which optimises active travel and the City's public realm objectives.
815. The improvements to the public realm represent good place making and there would be gains qualitatively compliant with the NPPF design policies, London Plan policies, Local Plan policies, Draft City Plan policies, the City Public Realm SPD.
816. Objections have been received from nearby residents, objecting mainly on the grounds of noise, disturbance, dust, impact to residential amenity, overlooking, and loss of daylight and sunlight. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations.
817. 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 and S106 obligations would minimise any adverse impacts.
818. The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is

a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S106 Agreement.

819. Although there is some non-compliance with parts of heritage and pedestrian movement policies, 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.
820. It is the view of officers that as a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 complied with, and as London Plan policy E1, are complied with, and no harm has been identified to result in non-compliance with the Policies of the Local Plan, the emerging City Plan or the London, it is considered that the development would be acceptable and in compliance with the development plan when considered as a whole.
821. 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.

SCHEDULE

APPLICATION: **23/01102/FULMAJ**

Hill House, 1 Little New Street Square

Description: Demolition of existing building above ground with retention of existing basement and piles/ foundations and erection of a mixed use office building comprising two basement levels, lower ground, upper ground and upper ground mezzanine plus 18 upper storeys for the provision of office space (Use Class E), gym/auditorium (Use Class E), flexible office, café/retail (Use Class E), reprovision of existing library (Use Class F1), flexible library/office (Use Class F1/E) and restaurant (Use Class E), discontinuance of the City Walkway (Little New Street To Wine Office Court), enhanced and enlarged public realm, hard and soft landscaping, highway works, and associated enabling 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 (a) Prior to demolition of the development: full details of the pre-demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement Guidance. In addition, the audit shall include a strategy to recycle the various concrete elements from deconstruction on site following in depth surveys of the structure and quality. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.
(b) Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, an update to the approved detailed Circular Economy Statement to reaffirm the proposed strategy, to include a site waste management plan, shall be submitted to and approved in writing the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The end-of-life strategy of the statement should include the approach to storing

detailed building information relating to the structure and materials of the new building. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.

REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plans and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2040: S16. These details are required prior to construction work commencing in order to establish the extent of recycling and minimised waste from the time that construction start.

- 3 Prior to the commencement of the development, excluding demolition, after RIBA stage 4, an update to the approved detailed Whole Life-Cycle Carbon Assessment, to include confirmation of high level recycled contents of steel and aluminium and cement replacement products, shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the whole life-cycle carbon emissions of the development are on track to achieve at least the GLA's Standard Benchmark and setting out further opportunities to achieve the GLA's Aspirational Benchmark that are defined in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life-Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2040: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

- 3 Prior to the commencement of the development, excluding demolition, details of the façade system confirming the detailed design in relation to reducing the embodied carbon impact and waste across all life-cycle stages that would result from the proposed facade type, materials,

construction method and replacement cycles, is required to be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved drawings.

REASON: To demonstrate that embodied carbon emissions have been minimised and that the development is sustainable in accordance with the e Local Plan policies: CS15, DM15.1, DM15.2 and Draft City Plan 2040 policies DE1 and CE1.

- 4 Prior to the commencement of the development, excluding demolition, a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.

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

- 5 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in

accordance with the following policy of the Local Plan: DMI0.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 7 Prior to the commencement of the development, details of the rainwater harvesting and greywater collection systems that can be included into the detailed design, to include the location of tanks and areas/locations of use for the collected water, shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To assist the environmental sustainability of the development and its resilience and adaptation to climate change in accordance with the following policies of the Local Plan: CS15, DM15.1, DM15.5.

- 8 Prior to 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 2040 policy OS3 Biodiversity.

- 9 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 SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

- 10 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

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

- 11 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.

- 12 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during

deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

- 13 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. This should include restriction of HGV movement to and from the site to within the hours of 9:30 to 16:30 Monday to Friday, 8 till 13:00 Saturdays and fully restrict movement on Sundays and Bank Holidays. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.

- 14 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.

- 15 Notwithstanding the submitted details, before any construction works hereby permitted are begun revised details of the layout of short stay cycle parking to be located outside the building but within the ownership boundary of the site shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3, and emerging policy AT3 of the Draft City Plan 2040.

- 16 Notwithstanding the submitted details, before any construction works hereby permitted are begun revised details of the layout providing a blue badge car parking bay within the boundaries of the application site shall be submitted to and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

REASON: To ensure provision is made for car parking for disabled people in accordance with the following policy of the Local Plan: DM16.5, and London Plan policy T6.5.

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

(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, blue roofs, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 1 l/s from each outfall and from no more than two distinct outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 270m³;
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

- 18 Prior to commencement of development, and where groundworks not shown on the approved drawings are to take place below the level of the existing structure or within the site boundary (including works for underpinning, new lift pits, foundations, lowering of floor levels, new or replacement drainage, provision of services or similar, and public realm works including at Gunpowder Square) prior notification should be given in writing to the City of London Archaeological Adviser in order to determine whether further consents are required and if the proposed works have archaeological implications.

REASON: To protect archaeological remains.

- 19 Prior to commencement of development, a detailed UXO (Unexploded Ordnance) Risk Assessment should be submitted to and approved by the Local Planning Authority. This assessment would be required prior to completion of the borehole survey (not needed for the trial pits) to determine whether special UXO supervision of the borehole drilling is required; or whether the basement already extends beyond maximum bomb penetration depth (in which case, no further UXO risk-mitigation measures would be required).

REASON: To ensure the safety of the development.

- 20 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.

- 21 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.

- 22 Prior to the commencement of the development, excluding demolition, details of all areas that undersail public highway, including floor plans and sections, shall be submitted to and approved in writing by the Local Planning Authority. The development shall then be implemented in accordance with approved details and be retained as such in perpetuity. REASON: To ensure that the development does not impact on existing public highway in accordance with the following policy of the Local Plan: DM16.1.

- 23 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which

such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

REASON: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. Should you require further information please contact Thames Water.

- 24 Before any construction work hereby permitted are begun, a scheme indicating the provision to be made for disabled people to gain access to all areas including library and retail uses shall be submitted to and approved in writing by the Local Planning Authority. The agreed scheme shall be implemented in accordance with the approved details before the development hereby permitted is brought into use.

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.

- 25 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- A. particulars and samples of the materials to be used on all external faces of the building including details of compliance with the approved Circular Economy Strategy;
- B. construction of 1:1 sample material and facade panels of agreed sections of the facades;
- C. detailed drawings of a scale no less than 1:20, in plan, section and elevation of agreed typical bays, including agreed typical bays including reference to materials, finishes, lighting, details of jointing and any necessary expansion/movement joints;
- D. details of all new ground and first-floor elevations including all entrances, soffits, columns, integrated art panels, and information boards;

- E. full details of terraces, including all elevations, entrances, fenestration, planters, seating, lighting, soffits, drainage, irrigation and any infrastructure required;
- F. details of walls, railings, balustrades, ramps, gates, screens, handrails etc, bounding or within the site;
- G. details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;
- H. details of the integration of M&E and building services into the external envelope, including but not limited to, details of external ducts, vents, louvres and extracts;
- I. details of all new service vehicle, fire escape and cycle store entrances;
- J. details of all external signage for all aspects of the building;
- K. details of access to the roof for cleaning and maintenance, including details of mansafe equipment;
- L. Notwithstanding the approved drawings, full details of the rooftop including any plant equipment and the roofscape;
- M. details of roof top terrace landscaping and planting specification of all landscape areas;
- N. details for the relocated Cannon in Gunpowder Square;
- O. details of the public art sculptures for the library entrance and for Gunpowder Square.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2 and emerging policies DE2, DE6 and HE1 of the Draft City Plan 2040.

- 26 All unbuilt and built surfaces, including the ground floor and roof levels landscaping, shall be treated in accordance with a landscaping scheme, including details of:
- a) Irrigation;
 - b) Provision for harvesting rainwater run-off from road to supplement irrigation;
 - c) Spot heights for ground levels around planting pit;
 - d) Soil;
 - e) Planting pit size and construction;
 - f) Tree guards; and
 - g) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development
 - h) the green roofs, hedges, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening;
 - i) the incorporation of blue roofs into roof surfaces;
 - j) the landscaping of the public realm;

k) public realm planting plan that includes more species that are climate resilient, native to the U.K. where possible and that are noted as 'plants for pollinators' by the RHS, as suggested in the biodiversity report.

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

REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM18.2, DM19.2.

- 27 No development other than demolition shall take place until the detailed design of all thermal comfort and wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.

REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 28 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, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.

REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2.

29 Prior to the commencement of the relevant works, a Lighting Concept and a Technical Lighting Design shall be submitted to and approved in writing by the Local Planning Authority, which should include details of:

- lighting layout/s including restricting light fixtures in the perimeter of the floorplate to mitigate impacts to nearby residential properties;
- details of compliance with lighting curfews;
- details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure);
- a lighting control methodology;
- proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies;
- all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass; - details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering.
- details of aviation lights including locations

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

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7, CS15, emerging policies DE1, DE2 and DE8 of the Draft City Plan 2040 and the City of London Lighting SPD 2023.

30 Details of the position and size of the green/blue roof(s), the type of planting and a substantial contribution of the green/blue roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.

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

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

REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures. Should you require further information please contact Thames Water.

- 32 If a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane, as per the requirements set out by CAP1096.

REASON: To ensure aircraft safety.

- 33 Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification Civil Aviation Authority (caa.co.uk) <https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/>, and the following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

REASON: To ensure aircraft safety.

- 34 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.

(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.

(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 35 The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

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

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

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

- 37 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.

- 38 No cooking shall take place within any Class A1, A3, A4 or A5 unit hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers

of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

- 39 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 operation of the building.

REASON: In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, London Plan policies SI1, SI3 D, and SD4 D.

- 40 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 generator/s 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.

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

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

- 42 Under the UK Water Industry Act 1991, section S111(1) and Building Regulations, Part H (Drainage and Waste Disposal) 2002, the proposals need to comply with the requirements of the sewerage undertaker (Thames Water Utilities Ltd), these being any building proposal which includes catering facilities will be required to be constructed with adequate grease traps to the satisfaction of Thames Water utilities ltd or their contractors.
REASON: To ensure satisfactory utilities provision for the proposed development.
- 43 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.
- 44 No live or recorded music that can be heard outside the premises shall be played.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 45 The roof terraces hereby permitted shall not be used or accessed between the hours of 20:00 on one day and 08:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 46 No amplified or other music shall be played on the roof terraces.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 47 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the

musical entertainment is provided at any time by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

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

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

- 49 Should unexpected contamination be identified during development hereby approved, the Local Planning Authority must be notified in writing within five working days. An investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

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

These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy as submitted with this planning application.

50 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

(a) A Lifetime Maintenance Plan for the SuDS system to include:

- A full description of how the system would work, it's aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;
- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency

required and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

51 Details of a Servicing Management Plan demonstrating the arrangements for control of the arrival and departure of vehicles servicing the premises shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. A daily servicing vehicle cap is applied limiting the daily maximum to vehicles. The building facilities shall thereafter be operated in accordance with the approved Servicing Management Plan (or any amended Servicing Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the building.

REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: DM16.1.

52 No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.

REASON: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering

working above or near our pipes or other structures. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

- 53 Fencing for the protection of any retained tree including the roots shall be installed in accordance with plans and particulars to be submitted to and approved in writing by the Local Planning Authority and shall be erected before any equipment, machinery or materials are brought on to the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition and the ground levels within those areas shall not be altered, nor shall any excavation be made, without the written consent of the Local Planning Authority.
REASON: In order to protect the trees on the site during building operations in accordance with the following policies of the Local Plan: DM10.4, DM19.2.
- 54 A minimum of two additional blue badge parking spaces shall be provided and maintained for the life of the development.
REASON: To mitigate the transport impacts of the development.
- 55 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 750 long stay spaces and 113 short stay 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 2040.
- 56 A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.
REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy TS cycling, emerging City Plan policy 6.3.24.

- 57 Unless otherwise agreed in writing by the Local Planning Authority a minimum of 38 showers and 778 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.
REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 58 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.
- 59 A minimum of 2 electric charging points must be provided within the delivery and servicing area and retained for the life of the building.
REASON: To further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS16.
- 60 No development shall be occupied until confirmation has been provided that either:
- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or
 - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.
- REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development” The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning.
- 61 Within 6 months of completion details of climate change resilience measures must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the

lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.

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

- 62 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 and 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 2040 policy OS2 City Greening and OS3 Biodiversity.

- 63 Post construction BREEAM assessments for each of the proposed uses demonstrating that a target rating of at least 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.

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

- 64 No later than 3 months after completion of the building, a post-construction Circular Economy Statement and material passport details shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.

REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.

- 65 Once the as-built design has been completed (upon commencement of RIBA Stage 6) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at

planning and detailed design stages, including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.

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

- 66 Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.

REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DMI0.1

- 67 Prior to occupation of the building the following details relating to signage shall be submitted to and approved in writing by the Local Planning Authority and all signage placed on the development site shall be in accordance with the approved details:

All signage must be erected and in place on the development site prior to occupation of the building.

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

- 68 Prior to the occupation of the buildings, the applicant is required to submit to the Local Planning Authority for approval of a wayfinding strategy including for the library use. The developer is to consider the implementation or removal of legible London signage within the site and surrounding locations. The extent of the works should be agreed with TFL, prior to submission.

REASON: In the interests of visual amenity and satisfactory pedestrian circulation of the site, in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

- 69 Prior to the relevant works hereby permitted, the applicant is required to submit to the Local Planning Authority for approval of details for public

art and a strategy including engagement with the local community for whole site including the library use entrance and use, and for Gunpowder Square.

REASON: In the interests of visual amenity and satisfactory pedestrian circulation of the site, in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

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

REASON: In the interests of safety in accordance with the following policies of the draft City Plan 2040: DE2 and DE4.

- 71 Before any works thereby affected are begun detailed plans, elevations and sections including spot heights of the roof level shall be submitted to and approved in writing by the Local Planning Authority to ensure sufficient design quality and the protection of the heritage significance of surrounding designated heritage assets.

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 and to ensure design quality and the protection of the heritage significance of surrounding designated heritage assets in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.3, CS13 and emerging policies DE2, DE6 and HE1 of the Draft City Plan 2040.

- 72 Before any commencement of relevant works hereby permitted are begun, details of a wheelchair accessible lifts, including platform lifts) providing access to the library and the affordable workspace floors 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.

- 73 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.

- 74 A Waste Management Plan to include details of backloading of waste onto delivery vehicles from the consolidation centre 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 Waste Management Plan (or any amended Waste Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the building.

REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: DM16.1.

- 75 Details of a Security Management Plan to ensure the security and safety of visitors and staff at the development, and details for CCTV including for external cycle parking, shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the development hereby permitted. The Management Plan must include details for the security arrangements for the publicly accessible spaces. The building facilities shall thereafter be operated in accordance with the approved Security Management Plan (or any amended Security Management Plan as may be varied from time to time by the Local Planning Authority) for the duration of the development.

REASON: To ensure that the development is secure from crime, disorder and terrorism in accordance with the following policy of the Local Plan: CS3.

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

REASON: In the interests of public safety.

- 77 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.

REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1

- 78 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.

- 79 Unless otherwise approved by the LPA no plant or telecommunications equipment shall be installed on the exterior of the building, including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.

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

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

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

- 81 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.

- 82 Before any commencement of relevant works hereby permitted are begun, details of the curved window fins and planters located at the external terraces at Levels 01-04 as set out in the approved drawings, including materials, plant species and maintenance, shall be submitted to and approved by the Local Planning Authority and shall be permanently maintained as per the approved details.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policy of the Local Plan: DM21.3.

- 83 Before any commencement of relevant works hereby permitted are begun, details of the existing condition of nearby residential windows and facades including cleaning and maintenance if required as a result of the development, shall be submitted to and approved by the Local Planning Authority and shall be permanently maintained as per the approved details.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policy of the Local Plan: DM21.3.

- 84 The development shall provide:
- 54,690 sq.m GEA of office floorspace (Class E(g(i)));
 - 1,195 sq.m GEA of flexible retail (Class E(a-d));
 - 1,066 sq.m GEA of public library use (Class F1);
 - 478 sq.m GEA of gym use (Use Class E(d)).

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

- 84 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:

Drawing numbers:

6799_A01-APT-XXX-ZZZZ-DR-A-PL0010;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0300;
6799_A01-APT-XXX-097B-DR-A-PL0100;
6799_A01-APT-XXX-098B-DR-A-PL0100;
6799_A01-APT-XXX-099L-DR-A-PL0100;
6799_A01-APT-XXX-100L-DR-A-PL0100;
6799_A01-APT-XXX-100M-DR-A-PL0100;
6799_A01-APT-XXX-101L-DR-A-PL0100;
6799_A01-APT-XXX-102L-DR-A-PL0100;
6799_A01-APT-XXX-103L-DR-A-PL0100;
6799_A01-APT-XXX-108L-DR-A-PL0100;
6799_A01-APT-XXX-109L-DR-A-PL0100;
6799_A01-APT-XXX-110L-DR-A-PL0100;
6799_A01-APT-XXX-111L-DR-A-PL0100;
6799_A01-APT-XXX-112L-DR-A-PL0100;
6799_A01-APT-XXX-113L-DR-A-PL0100;
6799_A01-APT-XXX-114L-DR-A-PL0100;
6799_A01-APT-XXX-115L-DR-A-PL0100;
6799_A01-APT-XXX-116L-DR-A-PL0100;
6799_A01-APT-XXX-117L-DR-A-PL0100;
6799_A01-APT-XXX-118L-DR-A-PL0100;
6799_A01-APT-XXX-118M-DR-A-PL0100;
6799_A01-APT-XXX-118R-DR-A-PL0100;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0100;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0200;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0201;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0300;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0301;

6799_A01-APT-XXX-ZZZZ-DR-A-PL0302;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0303;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0304;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0400;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0401;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0402;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0500;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0501;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0600;
6799_A01-APT-XXX-118R-DR-A-PL0100;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0301;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0302;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0303;
6799_A01-APT-XXX-ZZZZ-DR-A-PL0304;
PAD-100-P1;
PAD-312-P1;
PAD-101;
PAD-102;
PAD-103;
PAD-104;
PAD-105;
PAD-106;
PAD-203;
PAD-205;
SK-0377;
0399.

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

INFORMATIVES

Roof gardens

- 1 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.

Compliance with the Clean Air Act 1993

- 2 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. Generators and combustion plant

Generators and combustion plant

- 3 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 (www.gov.uk)

- 4 Environment Agency advice:

Contaminated Land

This development site appears to have been the subject of past industrial activity (printworks and cast iron and glass manufacturing) which poses a medium risk of pollution to controlled waters. However, we are unable to provide site-specific advice relating to land contamination as we have recently revised our priorities so that we can focus on:

- Protecting and improving the groundwater that supports existing drinking water supplies
- Groundwater within important aquifers for future supply of drinking water or other environmental use.

We recommend that you refer to the Environment Agency published 'Guiding Principles for Land Contamination' which outlines the approach which should be adopted when managing this site's risks to the water

environment. We also advise that you consult with your Environmental Health/Environmental Protection Department for advice on generic aspects of land contamination management. Where planning controls are considered necessary, we recommend that the environmental protection of controlled waters is considered alongside any human health protection requirements. This approach is supported by paragraph 174 of the National Planning Policy Framework.

Water Resources

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills. We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments. Residential developments All new residential developments are required to achieve a water consumption limit of a maximum of 125 litres per person per day as set out within the Building Regulations &c. (Amendment) Regulations 2015. However, we recommend that in areas of serious water stress (as identified in our report Water stressed areas - final classification) a higher standard of a maximum of 110 litres per person per day is applied. This standard or higher may already be a requirement of the local planning authority.

5 Network Rail advice:

The developer must ensure that their proposal, both during construction and after completion does not:

- encroach onto Network Rail land
- affect the safety, operation or integrity of the company's railway and its infrastructure
- undermine its support zone
- damage the company's infrastructure
- place additional load on cuttings
- adversely affect any railway land or structure
- over-sail or encroach upon the air-space of any Network Rail land
- cause to obstruct or interfere with any works or proposed works or Network Rail development both now and in the future

Network Rail strongly recommends the developer complies with the following comments and requirements to maintain the safe operation of the railway and protect Network Rail's infrastructure.

Future maintenance

The applicant must ensure that any construction and subsequent maintenance can be carried out to any proposed buildings or structures without adversely affecting the safety of/or encroaching upon Network Rail's adjacent land and air-space. Therefore, any buildings are required to be situated at least 2 metres (3m for overhead lines and third rail) from Network Rail's boundary. This requirement will allow for the construction and future maintenance of a building without the need to access the operational railway environment. Any less than 2m (3m for overhead lines and third rail) and there is a strong possibility that the applicant (and any future resident) will need to utilise

Network Rail land and air-space to facilitate works as well as adversely impact upon Network Rail's maintenance teams' ability to maintain our boundary fencing and boundary treatments. Access to Network Rail's land may not always be granted and if granted may be subject to railway site safety requirements and special provisions with all associated railway costs charged to the applicant.

As mentioned above, any works within Network Rail's land would need approval from the Network Rail Asset Protection Engineer. This request should be submitted at least 20 weeks before any works are due to commence on site and the applicant is liable for all associated costs (e.g. possession, site safety, asset protection presence costs). However, Network Rail is not required to grant permission for any third party access to its land.

Plant & Materials

All operations, including the use of cranes or other mechanical plant working adjacent to Network Rail's property, must at all times be carried out in a "fail safe" manner such that in the event of mishandling, collapse or failure, no plant or materials are capable of falling within 3.0m of the boundary with Network Rail.

Drainage

Storm/surface water must not be discharged onto Network Rail's property or into Network Rail's culverts or drains except by agreement with Network Rail. Suitable drainage or other works must be provided and maintained by the Developer to prevent surface water flows or run-off onto Network Rail's property. Proper provision must be made to accept and continue drainage discharging from Network Rail's property; full details to be submitted for approval to the Network Rail Asset Protection Engineer. Suitable foul drainage must be provided separate from Network Rail's existing drainage. Soakaways, as a means of storm/surface water disposal must not be constructed within 20 metres

of Network Rail's boundary or at any point which could adversely affect the stability of Network Rail's property. After the completion and occupation of the development, any new or exacerbated problems attributable to the new development shall be investigated and remedied at the applicants' expense.

Scaffolding

Any scaffold which is to be constructed within 10 metres of the railway boundary fence must be erected in such a manner that at no time will any poles over-sail the railway and protective netting around such scaffold must be installed. The applicant/applicant's contractor must consider if they can undertake the works and associated scaffold/access for working at height within the footprint of their property boundary.

Piling

Where vibro-compaction/displacement piling plant is to be used in development, details of the use of such machinery and a method statement should be submitted for the approval of the Network Rail's Asset Protection Engineer prior to the commencement of works and the works shall only be carried out in accordance with the approved method statement.

Fencing

In view of the nature of the development, it is essential that the developer provide (at their own expense) and thereafter maintain a substantial, trespass proof fence along the development side of the existing boundary fence, to a minimum height of 1.8 metres. The 1.8m fencing should be adjacent to the railway boundary and the developer/applicant should make provision for its future maintenance and renewal without encroachment upon Network Rail land. Network Rail's existing fencing / wall must not be removed or damaged and at no point during or post construction should the foundations of the fencing or wall or any embankment therein, be damaged, undermined or compromised in any way. Any vegetation within Network Rail's land boundary must not be disturbed. Any fencing installed by the applicant must not prevent Network Rail from maintaining its own fencing/boundary treatment.

Lighting

Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers' vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway. The developers should obtain Network

Rail's Asset Protection Engineer's approval of their detailed proposals regarding lighting.

Noise and Vibration

The potential for any noise/vibration impacts caused by the proximity between the proposed development and any existing railway should be made aware to the future occupiers of the site. It must also be assessed in the context of the National Planning Policy Framework which holds relevant national guidance information.

The current level of usage may be subject to change at any time without notification including increased frequency of trains, night-time train running and heavy freight trains. The appropriate building materials should be used to reduce any potential noise disturbance from the railway.

Vehicle Incursion

Where a proposal calls for hard standing area/parking of vehicles area near the boundary with the operational railway, Network Rail would recommend the installation of a highways approved vehicle incursion barrier or high kerbs to prevent vehicles accidentally driving or rolling onto the railway or damaging lineside fencing.

Landscaping

Any trees/shrubs to be planted adjacent to the railway boundary these shrubs should be positioned at a minimum distance greater than their predicted mature height from the boundary. Certain broad leaf deciduous species should not be planted adjacent to the railway boundary as the species will contribute to leaf fall which will have a detrimental effect on the safety and operation of the railway. Network Rail wish to be involved in the approval of any landscaping scheme adjacent to the railway. Any hedge planted adjacent to Network Rail's boundary fencing for screening purposes should be so placed that when fully grown it does not damage the fencing or provide a means of scaling it. No hedge should prevent Network Rail from maintaining its boundary fencing. If required, Network Rail's Asset Protection team are able to provide more details on which trees/shrubs are permitted within close proximity to the railway.

Existing Rights

Whilst not a planning matter, we would like to remind the applicant of the need to identify and comply with all existing rights on the land. Network Rail request all existing rights, covenants and easements are retained unless agreed otherwise with Network Rail.

Property Rights

Notwithstanding the above, if any property rights are required from Network Rail in order to deliver the development, Network Rail's Property team will need to be contacted.

6 Thames Water advice:

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

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

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. 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 will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk.

APPENDIX A – BACKGROUND PAPERS

List of Application Documents:

Application Form by Avison Young, dated 2nd October 2023;
CIL Form, dated 29th September 2023
Design and Access Statement by Apt (Revision R01), dated 29th September 2023;
Environmental Statement Volume 2: Townscape, Heritage and Visual Impact Assessment by Tavernor Consultancy Limited, dated September 2023;
Planning Schedules – Demolition GEA and GIA by Apt (Revision R01), dated 29th September 2023;
Planning Schedules - Existing GEA & GIA by Apt (Revision R01), dated 20th September 2023;
Planning Schedules - GEA & GIA by Apt (Revision R_01), dated 29th September 2023;
Planning Schedules - NIA & Terraces by Apt (Revision R_01), dated 29th September 2023;
Air Quality Impact Statement by Hilson Moran (Issue 01), dated 25th September 2023;
Archaeological Desk Based Assessment (Issue 4), dated 26th June 2023;
Circular Economy Statement by Chapman BDSP, dated September 2023;
Cultural Strategy by AND London, dated September 2023;
Delivery and Servicing Plan by Caneparo Associated, dated September 2023;
Economic Benefits Statement by WSP (Revision 1), dated 26th September 2023;
Energy Statement by Chapman BDSP, dated September 2023;
Environmental Statement Volume 1: Main Text and Figures by Avison Young, dated September 2023;
Equality Statement by WSP (Revision 1), dated 26th September 2023;
Fire Safety Statement by Hoare Lea, dated September 2023;
Flood Risk Assessment by Waterman Infrastructure & Environment Limited, dated September 2023;
Health Impact Assessment by WSP (Revision 1), dated 26th September 2023;
Landscape and Public Realm Strategy by Phil Allen Design, dated September 2023;
Library Management Plan by Opening the Book and Landsec, dated September 2023;
Lighting Strategy by Studio Fractal, dated September 2023;
Operational Waste Management Plan by Caneparo Associates, dated September 2023;
Outline Construction Logistics Plan by Caneparo Associates, dated September 2023;
Desk Based Contamination Report by Card Geotechnics Limited (Revision 2), dated 26th September 2023;
Preliminary Ecological Appraisal (PEA), BREEAM Ecology and Biodiversity Net Gain (BNG) Report by Greengage (Final), dated September 2023;
Security Needs Assessment by QCIC (Version F), dated 27th September 2023;
Social Value Statement by Social Value Portal, dated 27th September 2023;

Solar Glare Report by Avison Young, dated 1st September 2023;
Statement of Community Involvement by AND London, dated September 2023;
Sustainability Statement by Chapman BDSP, dated September 2023;
Thermal Comfort Assessment by GIA, dated September 2023;
Utilities Strategy by Chapman BDSP (Revision 03), dated September 2023;
Ventilation and Extraction Statement by Chapman BDSP (Revision 03), dated September 2023;
Whole Life Carbon Optioneering Study by Chapman BDSP, dated September 2023;
Whole Life Cycle Carbon Assessment by Chapman BDSP, dated September 2023;
Wind Microclimate Assessment by GIA, dated September 2023;
Noise Impact Assessment by Hoare Lea (Revision 02), dated 26th September 2023;
Planning Statement by Avison Young, dated September 2023;
Transport Assessment by Caneparo Associates, dated September 2023;
Travel Plan by Caneparo Associated, dated September 2023;
Cover Letter by Avison Young, dated 23rd October 2023;
Environmental Statement Volume 2: Townscape, Heritage and Visual Impact Assessment Addendum Views 17 and 18 by Tavernor Consultancy Limited, received November 2023;
Daylight, Sunlight and Overshadowing Review by GIA, dated 26th January 2024;
Third Party Review of the Whole Life-cycle Carbon Assessment of Hill House by AECOM (Revision 01), dated February 2024;
Wst 05 - Adaptation to Climate Change Risk Strategy - RIBA Stage 2 by Chapman BDSP, received November 2023;
GLA Whole Life Carbon Spreadsheet by Avison Young, received November 2023;
Tree Survey and Arboricultural Impact Assessment by Usherwood Arboriculture, dated 16th November 2023;
Carbon Emission Reporting Spreadsheet by Avison Young, received February 2023;
Circular Economy Statement Spreadsheet by Avison Young, received February 2023;
Hill House Library Design Update by Apt, dated February 2024;
Response to GIA Review Report by Delva Patman Redler, dated 23rd February 2024;
Pre-Redevelopment Exercise & City of London Questions by Chapman BDSP (Revision 01), dated March 2024;
Response to CoL Design Comments by Apt, dated January 2024;
Hill House – TfL Transport Response Note by Caneparo Associates, dated 22nd February 2024.
Whole life Carbon Optioneering Report - Rev 04, March 2024.
DPR Response to GIA Report dated 23.02.2024.
Letters sent to Sall Brathwaite, Nick Major, Dean Khanna - all dated 14.03.2024.

Internal Consultees:

Memo – District Surveyors, dated 1st November 2023;
Email – Air Quality Officer, dated 6th and 13th November 2023;

Memo - Access team dated 4th December 2023
Memo – Contract and Drainage Service, dated 26th October 2023;
Memo – Planning Obligations Officer, received 8th November 2023;
Memo – Lead Local Flood Authority, dated 10th November 2023;
Email – Cleansing Division, dated 24th November 2023 and 13th January 2024;
Memo – Environmental Health, dated 24th November 2023; 13 January 2024;
Memo – Public Relam, dated 27th November 2023
Memo – Environmental Resilience Officer, dated 8th December 2023;
Letter – Air Quality Officer, dated 5th December 2023;
Memo – City Gardens, dated 1st March 2024.

External Consultations:

Email – London Underground / DLR Safeguarding Engineer dated 31st October 2023.
Letter – Environment Agency, dated 2nd November 2023;
Letter – Westminster City Council, dated 20th December 2023;
Letter – London City Airport, dated 9th November 2023; 24 November 2023.
Email – NATS Safeguarding, dated 24th October 2023;
Letter – Transport for London Crossrail Safeguarding, dated 10th November 2023; and 26th October 2023.
Email – Transport for London Infrastructure Protection, dated 20th November 2023;
Letter - Natural England, dated 6th November 2023 and 1st December 2023;
Letter – London Parks and Gardens, dated 6th November 2023;
Email – City of London Archaeological Trust, dated 9th November 2023;
Letter – Greater London Archaeological Advisory Service, dated 10th November 2023;
Email – Thames Water, dated 10th November 2023;
Memo – Network Rail, received 13th November 2023;
Letter – Twentieth Century Society, dated 14th November 2023;
Letter – London Borough of Tower Hamlets, dated 15th November 2023;
Letter – Greater London Authority, dated 24th November 2023;
Email – Planning Obligations, dated 27th November 2023;
Letter - Surveyor to the fabric (St. Paul's) dated 28th November 2023;
Letter - Royal Borough of Greenwich, dated 28th November 2023 and 18th January 2024;
Letter – Southwark Council, received December 2023;
Letter – Transport for London Spatial Planning, dated 15th December 2023;
Letter – London Borough of Camden, dated 10th January 2024;
Email – City Police Partnerships and Preventions Hub, dated 29th February 2024.
Letter - The Gardens Trust dated 6th November 2023.
Email - Heathrow Safeguarding – 24th October 2023; 9th November 2023.
Letter - Historic England – 12th November 2023.

Other:

Email from Avison Young – Response to Air Quality Officer Comments, dated 9th November 2023;
Email from Avison Young – Response to Historic England, dated 17th January 2024;

Email from Avison Young – Response to Twentieth Century Society, dated 12th January 2024.

Representations:

Ms Amanda Singleton - 20.11.2023 (Objection)

Alderwoman Martha Grekos - 02.12.2023

Mr Daniel Langan - 04.12.2023

Mr Nick Major - 12.01.2024 (Objection)

Dr Sally Braithwaite - 14.01.2024 (Objection)

Mr Dean Khanna - 14.01.2024 (Objection)

Jess Bull – 22.03.2024 (Support)

Holly Hetherington – 22.03.2024 (Support)

Louis Cooke – 21.03.2024 (Support)

Danial Zamri – 21.02.2024 (Support)

Jess – 21.03.2024 (Support)

Fiona Sinclair – 21.03.2024 (Support)

Jack Harris Robinson – 21.03.2024 (Support)

Amelia Saunders – 21.03.2024 (Support)

Ee Li – 21.03.2024 (Support)

EC – 21.03.2024 (Support)

Shruti – 21.03.2024 (Support)

Arjen Xani – 21.03.2024 (Support)

Syona – 21.03.2024 (Support)

Akshay Loomba – 21.03.2024 (Support)

Avi – 21.03.2024 (Support)

Sophia – 21.03.2024 (Support)

Cameron Arthur – 21.03.2024 (Support)

Liam Martin – 22.03.2024 (Support)

Alex Davies – 21.03.2024 (Support)

Will Batt – 21.03.2024 (Support)

Shivani Kumar – 21.03.2024 (Support)

Toki – 21.03.2024 (Support)

Jocelyn Phimister – 21.03.2024 (Support)

Rishi P – 21.03.2024 (Support)

Jo Rigby – 21.03.2024 (Support)

Liesel De Silva – 21.03.2024 (Support)

Anna Niederlander – 21.03.2024 (Support)

Robert Guthrie – 21.03.2024 (Support)

Dougal Murray – 21.03.2024 (Support)

Graham – 22.03.2024 (Support)

Kit Holdridge – 22.03.2024 (Support)

Sophie – 22.03.2024 (Support)

Bradley Hughes – 22.03.2024 (Support)

Isobel Roberts – 22.03.2024 (Support)

Issy Riglesford – 22.03.2024 (Support)

Archie Osei – 22.03.2024 (Support)

Daniel Zamri – 21.03.2024 (Support)

Nancy Walter – 21.03.2024 (Support)

Emily – 21.03.2024 (Support)

Felix Smith – 21.03.2024 (Support)

Sophie Bleaney – 22.03.2024 (Support)

Molly Richardson – 22.03.2024 (Support)

Casper McKensie – 22.03.2024 (Support)

APPENDIX B - POLICIES

Relevant Local Plan Policies

CS1 Provide additional offices

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

CS2 Utilities infrastructure

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

CS3 Security and Safety

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

CS4 Planning contributions

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

CS10 Design

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

CS11 Encourage art, heritage and culture

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

CS12 Conserve or enhance heritage assets

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

CS13 Protect/enhance significant views

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

CS14 Tall buildings in suitable places

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

CS15 Creation of sustainable development

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

CS16 Improving transport and travel

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

CS17 Minimising and managing waste

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

CS18 Minimise flood risk

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

CS19 Improve open space and biodiversity

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

CS20 Retailing

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

CS21 Housing

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

CS22 Maximise community facilities

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

DM1.2 Assembly and protection of large office development sites

To promote the assembly and development of sites for large office schemes in appropriate locations. The City Corporation will:

- a) assist developers in identifying large sites where large floorplate buildings may be appropriate;
- b) invoke compulsory purchase powers, where appropriate and necessary, to assemble large sites;
- c) ensure that where large sites are developed with smaller buildings, the design and mix of uses provides flexibility for potential future site re-amalgamation;
- d) resist development and land uses in and around potential large sites that would jeopardise their future assembly, development and operation, unless there is no realistic prospect of the site coming forward for redevelopment during the Plan period.

DM1.3 Small and medium business units

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

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

DM1.5 Mixed uses in commercial areas

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

DM2.1 Infrastructure provision

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

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

- a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply (TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
- b) reasonable gas and water supply considering the need to conserve natural resources;
- c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;

- d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
 - e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.
- 3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.
- 4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

DM3.2 Security measures

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

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

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by: a) conducting a full risk assessment; b) keeping access points to the development to a minimum; c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage; d) ensuring early consultation with

the City of London Police on risk mitigation measures; e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by: a) consulting the City Corporation on all matters relating to servicing; b) restricting motor vehicle access, where required; c) implementing public realm enhancement and pedestrianisation schemes, where appropriate; d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on: a) the amenity of residents and other noise-sensitive uses; b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises. 2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

DM10.1 New development

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

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would

- adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
 - i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
 - j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
 - k) there is provision of amenity space, where appropriate;
 - l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

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

DM10.3 Roof gardens and terraces

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

DM10.4 Environmental enhancement

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

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;

- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.5 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.

DM10.7 Daylight and sunlight

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

DM10.8 Access and inclusive design

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

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

DM11.1 Visitor, Arts and Cultural

- 1) To resist the loss of existing visitor, arts and cultural facilities unless:
 - a) replacement facilities are provided on-site or within the vicinity which meet the needs of the City's communities; or
 - b) they can be delivered from other facilities without leading to or increasing any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on the site; or
 - c) it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.
- 2) Proposals resulting in the loss of visitor, arts and cultural 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 floorspace has been actively marketed as a visitor, arts or cultural facility at reasonable terms.

DM11.2 Public Art

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

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

DM12.1 Change affecting heritage assets

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

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.4 Archaeology

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

DM15.1 Sustainability requirements

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

DM15.2 Energy and CO2 emissions

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

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

DM15.3 Low and zero carbon technologies

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

DM15.4 Offsetting carbon emissions

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

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

DM15.5 Climate change resilience

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

DM15.6 Air quality

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

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and

restrictions on operating hours will be implemented through appropriate planning conditions.

3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM15.8 Contaminated land and water quality

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.

DM16.1 Transport impacts of development

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

DM16.2 Pedestrian movement

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

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

DM16.3 Cycle parking

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

DM16.4 Encouraging active travel

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

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas

at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

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

DM17.1 Provision for waste

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

DM17.2 Designing out construction waste

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

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

DM18.2 Sustainable drainage systems

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

DM19.1 Additional open space

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

DM19.2 Biodiversity and urban greening

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

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

DM20.3 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.

DM20.4 Retail unit sizes

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.
2. Major retail units (over 1,000sq.m) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

DM21.3 Residential environment

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

DM22.1 Social and community facilities

1. To resist the loss of social and community facilities unless:
 - a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
 - b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
 - c) it has been demonstrated that there is no demand for another similar use on site.
2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been

demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.

3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:
 - a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
 - b) in locations which are convenient to the communities they serve;
 - c) in or near identified residential areas, providing their amenity is safeguarded;
 - d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.
4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

DM22.2 Provision of Public Toilets

A widespread distribution of public toilets which meet public demand will be provided by:

- a) requiring the provision of a range of public toilet facilities in major retail and leisure developments, particularly near visitor attractions, public open spaces and major transport interchanges. This includes the provision of pop-up toilets in suitable areas with concentrations of night-time activity;
- b) supporting an increase in the membership of the Community Toilet Scheme;
- c) resisting the loss of existing public toilets unless adequate provision is available nearby and requiring the provision of replacement facilities;
- d) taking the opportunity to renew existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments where they are needed to meet increased demand.

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

London Plan Policies

- Policy GG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy GG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall Buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D13 Agent of Change
- Policy D14 Noise
- Policy S1 Developing London's Social Infrastructure
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable Workspace
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy HC6 Supporting the night-time economy
- Policy G1 Green infrastructure
- Policy G4 Open space
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI3 Energy Infrastructure
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI6 Digital connectivity infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI8 Waste capacity and net waste self-sufficiency
- Policy SI12 Flood risk management

- 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 (and T6.2, T6.3, T6.4, T6.5).
- 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);
- 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)

Draft City Plan 2040 Policies

STRATEGIC POLICY S1: HEALTHY AND INCLUSIVE CITY

POLICY HL1: INCLUSIVE BUILDINGS AND SPACES

POLICY HL2: AIR QUALITY

POLICY HL3: NOISE

POLICY HL4: CONTAMINATED LAND AND WATER QUALITY

POLICY HL5: LOCATION AND PROTECTION OF SOCIAL AND COMMUNITY FACILITIES

POLICY HL6: PUBLIC TOILETS

POLICY HL7: SPORT AND RECREATION

POLICY HL8: PLAY AREAS AND FACILITIES

POLICY HL9: HEALTH IMPACT ASSESSMENT (HIA)

STRATEGIC POLICY S2: SAFE AND SECURE CITY

POLICY SA1: PUBLICLY ACCESSIBLE LOCATIONS

POLICY SA2: DISPERSAL ROUTES

POLICY SA3: DESIGNING IN SECURITY

STRATEGIC POLICY S3: HOUSING

POLICY HS3: RESIDENTIAL ENVIRONMENT

STRATEGIC POLICY S4: OFFICES

POLICY OF1: OFFICE DEVELOPMENT

POLICY OF2: PROTECTION OF EXISTING OFFICE FLOORSPACE

POLICY OF3: TEMPORARY 'MEANWHILE' USES

STRATEGIC POLICY S5: RETAIL AND ACTIVE FRONTAGES

POLICY RE2: ACTIVE FRONTAGES

STRATEGIC POLICY S6: CULTURE AND VISITORS

POLICY CV1: PROTECTION OF EXISTING VISITOR, ARTS AND CULTURAL FACILITIES

POLICY CV2: PROVISION OF ARTS, CULTURE AND LEISURE FACILITIES

POLICY CV3: PROVISION OF VISITOR FACILITIES

POLICY CV4: HOTELS

POLICY CV5: EVENING AND NIGHT-TIME ECONOMY

POLICY CV6: PUBLIC ART

STRATEGIC POLICY S7: INFRASTRUCTURE AND UTILITIES

8.2 POLICY IN1: INFRASTRUCTURE PROVISION AND CONNECTION

8.3 POLICY IN2: INFRASTRUCTURE CAPACITY

8.4 POLICY IN3: PIPE SUBWAYS

STRATEGIC POLICY S8: DESIGN

POLICY DE1: SUSTAINABLE DESIGN

POLICY DE2: DESIGN QUALITY

POLICY DE3: PUBLIC REALM

POLICY DE4: TERRACES AND ELEVATED PUBLIC SPACES

POLICY DE5: SHOPFRONTS

POLICY DE6: ADVERTISEMENTS

POLICY DE7: DAYLIGHT AND SUNLIGHT

POLICY DE8: LIGHTING

STRATEGIC POLICY S9: TRANSPORT AND SERVICING

POLICY VT1: THE IMPACTS OF DEVELOPMENT ON TRANSPORT

POLICY VT2: FREIGHT AND SERVICING

POLICY VT3: VEHICLE PARKING

POLICY VT4: RIVER TRANSPORT

POLICY VT5: AVIATION LANDING FACILITIES

STRATEGIC POLICY S10: ACTIVE TRAVEL AND HEALTHY STREETS

POLICY AT1: PEDESTRIAN MOVEMENT, PERMEABILITY AND WAYFINDING

POLICY AT2: ACTIVE TRAVEL INCLUDING CYCLING

POLICY AT3: CYCLE PARKING

STRATEGIC POLICY S11: HISTORIC ENVIRONMENT

POLICY HE1: MANAGING CHANGE TO THE HISTORIC ENVIRONMENT

POLICY HE2: ANCIENT MONUMENTS AND ARCHAEOLOGY

POLICY HE3: SETTING OF THE TOWER OF LONDON WORLD HERITAGE SITE

STRATEGIC POLICY S12: TALL BUILDINGS

STRATEGIC POLICY S13: PROTECTED VIEWS

STRATEGIC POLICY S14: OPEN SPACES AND GREEN INFRASTRUCTURE

POLICY OS1: PROTECTION AND PROVISION OF OPEN SPACES

POLICY OS2: URBAN GREENING

POLICY OS3: BIODIVERSITY

POLICY OS4: BIODIVERSITY NETGAIN

POLICY OS5: TREES

STRATEGIC POLICY S15: CLIMATE RESILIENCE AND FLOOD RISK

13.2 POLICY CR1: OVERHEATING AND URBAN HEAT ISLAND EFFECT

13.3 POLICY CR2: FLOOD RISK

13.4 POLICY CR3: SUSTAINABLE DRAINAGE SYSTEMS (SUDS)

13.5 POLICY CR4: FLOOD PROTECTION AND FLOOD DEFENCES

13.6 STRATEGIC POLICY S16: CIRCULAR ECONOMY AND WASTE

13.7 POLICY CE1: SUSTAINABLE WASTE FACILITIES AND TRANSPORT

STRATEGIC POLICY S22: FLEET STREET AND LUDGATE

STRATEGIC POLICY S26: PLANNING CONTRIBUTIONS