

Carroll, Ray

From: Seda Guillen Izuma [REDACTED]
Sent: 31 January 2024 09:54
To: PLN - Comments
Subject: RE: Planning Application Consultation: 23/01417/FULMAJ

THIS IS AN EXTERNAL EMAIL

OFFICIAL

Dear Planning,

Thank you for consulting Network Rail. However, the application site is close to TfL assets.

Please contact them directly.

Kind regards,

Seda Guillen Izuma
Town Planning Technician
Network Rail Property (Southern)

-----Original Message-----

From: [REDACTED]
Sent: 31 January 2024 09:39
To: Town Planning Southern [REDACTED]
Subject: Planning Application Consultation: 23/01417/FULMAJ

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Dear Sir/Madam

Please see attached consultation for 1-8 Long Lane London EC1A 9HF .
Reply with your comments to [REDACTED]

Kind Regards

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London

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Memo

To Assistant Director (Development Management)
Department of the Built Environment

From District Surveyors Office
Department of the Built Environment

Telephone [REDACTED]

Email [REDACTED]

Date 24 January 2024

Our Ref DS/FS24/0008

Your Ref PT_AT/23/01417/FULMAJ

Subject 1-8 Long Lane London EC1A 9HF

In response to your request for comments in relation to the fire statement the District Surveyors Office has the following comments to make:

The District Surveyors Office has reviewed the fire statement and has the following comments;

1. The fire statement is acceptable and the proposal is considered to generally comply with policies D5 and D12. However, there is no information regarding provision of fire hydrants and I would recommend dealing with this by way of condition.



Historic England

Ms Anna Tastsoglou
City of London Corporation
Environment Department
PO Box 270, Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3520

Our ref: P01572248

8 February 2024

Dear Ms Tastsoglou

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**1-8 LONG LANE LONDON EC1A 9HF
Application No. 23/01417/FULMAJ**

Thank you for your letter of 31 January 2024 regarding the above application for planning permission.

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>

It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

Please note that this response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

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HistoricEngland.org.uk





Historic England

Kate Tatlow
Business Officer



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Telephone 020 7973 3700
HistoricEngland.org.uk



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Memo



To Department of Planning & Transportation

From Paul Jones

Contract and Drainage Service

Department of the Built Environment

Telephone [REDACTED]

Email [REDACTED]

Date 9 February 2024

Subject GREASE TRAP REQUIREMENT

For action

Application No. 23/01417/FULMAJ

Address: **1-8 Long Lane, London, EC1A 9HF**

Under the UK Water Industry Act 1991, section S111(1) and Building Regulations, Part H (Drainage and Waste Disposal) 2002, the proposals for the above planning application, 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.

I would be obliged if you could incorporate this in your response to the planning department, regarding this application.

Paul Jones



09 February 2024
Crossrail Ref: CRL-IP-3090

Transport for London
Crossrail
Safeguarding
5 Endeavour Square
London E20 9EJ

Dear Anna Tastsoglou,

23/01417/FULMAJ : 1-8 Long Lane London EC1A 9HF

Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008.

Your letter to TfL dated 31 January 2024, requesting the views of CRL_Safeguarding on the above application was directed to CRL_Safeguarding@tfl.gov.uk a statutory consultee. I confirm that the application relates to land within the limits of land subject to consultation by the Crossrail Safeguarding Direction. If the Council, in its capacity as Local Planning Authority, is minded to grant planning permission, please apply the following conditions on the Notice of Permission:

Elizabeth line condition for foundation design and settlement

- C1 None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling, any temporary works, and site investigations, have been submitted to and approved in writing by the Local Planning Authority which:-
 - (i) Accommodate the Elizabeth line infrastructure, including any temporary works associated with the Elizabeth line (formerly known as Crossrail),
 - (ii) Mitigate the effects on the Elizabeth line, of ground movement arising from the development. The development shall be carried out in all respects in accordance with the approved design and method statements.

All structures and works comprised within the development hereby permitted which are required by paragraphs C1(i) and C1 (ii) of this condition shall be completed, in their entirety, before any part of the building[s] hereby permitted is/are occupied.

Elizabeth line Informative - transmitted groundbourne noise & vibration

- I1 The Developer is recommended to assess and mitigate the possible effects of noise and vibration arising from the operation of the Elizabeth line.

.....

NOTE:

TfL Location Enquiries SMBLocationEnquiries@tfl.gov.uk and other TfL teams may also wish to comment.

If you require any further information, please contact:

[REDACTED]

Yours sincerely,

Will Orlik

Safeguarding Officer (Elizabeth line)

[REDACTED]

TfL Infrastructure Protection Team

Floor 7 B5 : 5 Endeavour Square : London : E20 1JN

.....

Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to [REDACTED]

.....

The Elizabeth line (Crossrail) is a new railway that links Heathrow, Maidenhead and Reading in the west to Shenfield and Abbey Wood in the east, using existing Network Rail tracks and new stations and tunnels under Central London.

Transport for London (TfL) administers the Crossrail Safeguarding Direction made by the Secretary of State for Transport on 24 January 2008. The Direction was extended on 29 April 2009 (Maidenhead to Reading) and 14 October 2009 (Abbey Wood to Gravesend and Hoo Junction).

Planning Obligations Comments (City CIL, Mayoral CIL and S106)

Address: 1-8 Long Lane, London EC1A 9HA

Application Reference: 23/01417/FULMAJ

Case Officer: Anna Tastsoglou

Description: Demolition of existing buildings to basement level and construction of a nine-storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground floor together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works

Mayoral CIL 2 (MCIL2) and City Community Infrastructure Levy (CIL)

Mayoral and City CIL applies to developments where there is an uplift in Gross Internal Area (GIA) of at least 100sqm or create one or more dwellings. Social housing, and development for charities for charitable purposes, are offered relief or are exempt from the levy. Education and Health related developments are charged at a nil rate. In the case of MCIL2 a rate of £80 per sqm is applied to eligible developments however, as the City is located within the Central Activity Zone (CAZ), differential rates apply to office, retail and hotel developments and are set at £185, £165 and £140 respectively. City CIL is also set at differential rates for riverside residential £150 per sqm and £95 per sqm for 'Rest of City' residential and £75 for offices and all other uses.

MCIL2 has been calculated to be **£288,903.48** (excl. indexation) and the **City CIL** is **£153,900.00** (excl. indexation) based on the uplift in floorspace of 2,052sqm (GIA).

In accordance with the CIL regulations the City Corporation would retain 4% of MCIL2 and 5% of the City CIL for its expenses associated with administering City CIL and Mayor of London CIL.

City Planning Obligations

In accordance with the Planning Obligations SPD 2021, financial contributions would be payable on commercial developments, where there is a net increase of 500sqm or more of Gross Internal Area, at a rate of:

- Affordable Housing Contribution (£50 per sqm);
- Local Training, Skills and Job Brokerage Contribution (£30 per sqm);
- Security Measures Contribution (£10 per sqm); and
- Carbon Offsetting (£95 per tonne of carbon to be offset over a period of 30 years).

Residential developments which have the potential for 10 or more units of housing, developers would be required to pay the Local Training, Skills and Job Brokerage at a rate of £5 per sqm.

Local Plan Strategic Policy S3: Housing seeks the provision of affordable housing units on-site (or off-site) or the payment of a commuted sum in-lieu of on-site provision. Affordable housing on-site must be provided at a rate of:

- a minimum of 35% of the total number of housing units proposed; or
- a minimum of 50% affordable housing on public sector owned land.

Where it is demonstrated that is not viable to provide units on-site, a commuted sum or cash in-lieu contribution will be required. The level of contribution will be calculated on a site-by-site basis. The Local Plan Viability Assessment indicates that

a viable contribution to off-site provision should lie in the range of £440,000 to £460,000 per unit.

In this case, the following financial contributions will be secured through a Section 106 Agreement:

- Affordable Housing Contribution (£102,600 *minus 1% for S106 Monitoring*)
- Local Training, Skills and Job Brokerage Contribution (£61,650 *minus 1% for S106 Monitoring*)
- S106 Monitoring Contribution (£2,750 *plus 1% of AH & LTSJB Contributions*)
- Construction Monitoring Cost (£30,935 - *First Year of development and £25,760 for subsequent years*)
- Section 278 Works - Evaluation and Design Fee (TBC)

It is the City's practice for all financial contributions to be index-linked with reference to the appropriate index from the date of adoption of the City's Planning Obligations SPD (May 2021) to the date of planning permission.

In addition to the contributions above, the obligations set out below will also be secured through the Section 106 Agreement. They are required in accordance with the City's Planning Obligations SPD 2021 and are necessary to make the application acceptable in planning terms.

- Highway Reparation and other Highways Obligations
(*Highways Schedule of Condition Survey, site access, consents, licences etc*)
- Local Procurement Strategy
- Employment and Skills Plan (*Demolition / Construction / End Use*)
- Delivery and Servicing Management Plan (*including Consolidation*)
- Travel Plan (including Cycling Promotion Plan)
- Carbon Offsetting
- 'Be Seen' Energy Performance Monitoring
- Section 278 Agreement (CoL)
- Public Realm Space (*Specifications, Public Access & Management Plan*)
- Cultural Plan

Administration and Monitoring

The applicant will pay the City of London's legal costs incurred in the negotiation and execution of the legal agreement and the City Planning Officer's administration costs in respect of the same. These charges are set out on the City Corporations website and will be reviewed from time to time.

Informative – 005B

Informative 005B - CIL

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office £185 sqm

Retail £165 sqm

Hotel £140 sqm

All other uses £80 per sqm

These rates are applied to "chargeable development" over 100sqm (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of £75 per sqm for offices, £150 per sqm for Riverside Residential, £95 per sqm for Rest of City Residential and £75 for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.co.uk/planning/policy-and-legislation/CIL/download-the-forms).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

Planning Obligations

12/02/2024

LR



Historic England

Anna Tastsoglou
PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 23/01417/FULMAJ
Our Ref: 219280

Contact:
Helen Hawkins



16th February 2024

Dear Anna,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2021

1-8 Long Lane London EC1A 9HF

Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works

Recommend Two Archaeological Conditions

Thank you for your consultation received on 31st January 2024.

The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

Assessment of Significance and Impact



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

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

The site is located to the north-west of the Roman and medieval city walls. An Archaeological Desk Based Assessment accompanied the planning application (MOLA 2023) which identified a high potential for Roman agricultural and quarrying remains, a possibility for Roman burials and a moderate potential for remains of medieval and post-medieval date. Buildings are shown on the site on historic maps and the site is just outside the medieval Charterhouse Precinct.

Although the site is currently occupied by a building that has a basement, the basement is only single storey and therefore the site retains a potential for archaeological deposits of Roman and medieval date. The proposed development comprises a new basement slab being constructed in 1-5 Long Lane and the lowering of the existing basement in 6-8 Long Lane. There will also be associated piling. The lowering of the basement and the construction of a new slab is likely to have an impact on archaeological remains.

Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendations

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable



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safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

I therefore recommend attaching two conditions as follows:

Condition 1 No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. Where appropriate, details of a programme for delivering related positive public benefits
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

Informative Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Condition 2 Foundation Design

No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.



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These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to these pre-commencement conditions, please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 211.

I envisage that the archaeological fieldwork would comprise the following:

Geotechnical Monitoring

Archaeological monitoring of geotechnical pits and boreholes can provide a cost-effective means of establishing the potential for archaeological remains to survive on previously developed land or where deep deposits are anticipated. It is usually used as part of a desk-based assessment or field evaluation.

Evaluation

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

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

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From:
To:
Subject: RE: Planning Application Consultation: 23/01417/FULMAJ
Date: 14 February 2024 14:57:52

THIS IS AN EXTERNAL EMAIL

FAO Anna Tastsoglou,

Planning Application Consultation: 23/01417/FULMAJ

Location: 1-8 Long Lane London EC1A 9HF

Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part

ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Thank you for your consultation.

Though we have no objection in principle to the above planning application there are a number of potential constraints on the redevelopment of a site situated close to railway infrastructure. Therefore, it will need to be demonstrated to the satisfaction of TfL Infrastructure Protection engineers that:

- our right of support is not compromised
- the development will not have any detrimental effect on our structures either in the short or long term
- the design must be such that the loading imposed on our structures is not increased or removed
- we offer no right of support to the development or land

Therefore, we request that the grant of planning permission be subject to the following separate numbered conditions to be discharged in a phased manner as and when they are completed.

1. Before the commencement stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.

- a. Site specific Risk Assessments and Method Statements (RAMS) for any activities which TfL may deem to be a risk to London Underground (LU). Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing.
- b. Demonstrate that the design allows for any EMC emissions from LU's tunnel tracks and adjacent electrical equipment.
- c. Details of any changes in loading to LU's infrastructure because of the works or temporary works
- d. Written confirmation will be required from Thames Water that any increased drainage or sewage from the site will not be discharged directly or indirectly into LU's drainage system.
- e. Accommodate the location of the existing LU infrastructure.
- f. There should be no opening windows, roof gardens or balconies facing the LU elevation.
- g. Demonstrate access to elevations of the proposed building adjacent to the

property boundary with LU can be undertaken without recourse to entering LU land or airspace.

- h. Demonstrate that there will at no time be any potential security risk to LU's railway, property or structures.
- i. Provide a proposal for future maintenance of the building facade.
- j. No works to commence near or on the boundary with London Underground assets until any party wall agreements required with TfL Engineering, TfL Property or TfL Legal have been agreed and signed by all parties.
- k. Mitigate the effects of noise and vibration arising from the adjoining railway operations and maintenance within their structures and land.
- l. No claims to be made against TfL or LU by the Local Authority (e.g. The Royal Borough of Kensington and Chelsea), purchasers, tenants, occupants or lessees of the development for any noise or vibration resulting from LU running, operating and maintaining the adjacent railway
- m. No works to commence on any part of TfL/LU Property or in its airspace until any agreements required with TfL Engineering, TfL Property or TfL Legal have been agreed and signed by all parties.
- n. Landscaping to be agreed in accordance with the London Underground landscaping standard.

2. Before the Demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.

- a. Site specific Risk Assessments and Method Statements (RAMS) for any activities scaffolding tall plant use and demolition plant.
- b. A ground movement analysis will be required for demolition only.
- c. Structure monitoring and track monitoring duration of construction works if required.
- d. Full consultation with TfL Engineering Infrastructure Protection to agree demolition, and site remedial methodologies.
- e. No support to be taken from LU's land or structures.
- f. No glare or glint to be shed onto the railway from the construction, or any lighting.

3. Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.

- a. Prior to commencement of each phase of the development, provide detailed design for foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent)
- b. Site specific Risk Assessments and Method Statements (RAMS) for any activities (groundworks, piling) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing.
- c. Details of any changes in loading to LU's infrastructure because of the works or temporary works
- d. A ground movement assessment/Impact assessment will be required for sub-structure.
- e. No support to be taken from LU's land or structures.
- f. Completion of a glare and glint study to ensure no vision impairment to the drivers

on the operational railway from the construction, or any lighting.

4. Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.

- a) Provide detailed design for all superstructure works (temporary and permanent)
- b) Provide details on the erection and use of tall plant (e.g. tower cranes, mobile cranes and piling rigs) and scaffolding prior to commencement of works
- c) Tower Crane base design (including certification), Risk Assessment and Method Statement for siting, erection, lifting arrangements, operational procedure (including any radio communications), jacking up, derigging in addition to plans for elevation, loads, radius, slew restrictions and collapse radius. No cranes should be erected or dismantled until LU Engineer's approval has been obtained in writing.
- d) Site specific Risk Assessments and Method Statements (RAMS) for any activities (craneage, scaffolding, use of tall plant) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing
- e) Details of any changes in loading to LU's infrastructure because of the works or temporary works-
- f) Ground movement assessment/impact assessment will be required.
- g) Structure monitoring and track monitoring duration of construction works if required.
- h) No glare or glint to be shed onto the railway from the construction, the completed structure, or any lighting.
- i) No support to be taken from LU's land or structures.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

We also ask that the following informative is added:

The applicant is advised to contact TfL Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; construction methods; tall plant: scaffolding: security; boundary treatment; safety barriers; landscaping and lighting.

A Party Wall notice will be required to be served to Transport for London Infrastructure Protection in advance of carrying out any works near or on a party wall.

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Mehmet Kani (AlstructE) | Safeguarding Engineer

LU/DLR | Infrastructure Protection | Engineering

Transport for London

7th Floor Zone B, 5 Endeavour Square, Stratford E20 1JN

-----Original Message-----

From:

Sent: 31 January 2024 09:40

To: Location Enquiries

Subject: Planning Application Consultation: 23/01417/FULMAJ

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for 1-8 Long Lane London EC1A 9HF .

Reply with your comments to

Kind Regards

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London

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Memo

To Assistant Director (Development Management)
Environment Department

Telephone [REDACTED]

Email [REDACTED]



From Alexander Carlyon Smith
Environmental Health Officer
Environment Department

Telephone [REDACTED]

Email [REDACTED]

Date 19/02/2024

Our Ref 24/00707/NPLN

Your Ref PT_AT/23/01417/FULMAJ

Subject Commercial Union House 1 - 5 Long Lane

Thank you for your memorandum and attached drawings etc.

This Department has the following observations and comments to make:-

No part of the roof areas except those shown as roof terraces on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.

REASON: *To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.*

126 The roof terraces hereby permitted shall not be used or accessed between the hours of 21:00 on one day and 07:00 on the following day.

REASON: *To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.*

127 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.*

The restaurant/bar/takeaway usage hereby permitted shall not be open to customers between the hours of (23:00) on one day and (07:00) on the following day.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Self-closing mechanisms must be fitted on the doors at Ground Floor before the Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) use commences and shall be retained for the life of the premises. The doors must not be left open except in an emergency or for maintenance purposes.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- (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.

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 Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Sui Generis(Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) 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.

No cooking shall take place within any Sui Generis(Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) 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.

Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details 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. No demolition or construction shall be carried out other than in accordance with the approved details and methods.

REASON: To ensure that demolition and 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 demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.

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.

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.*

Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.

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

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.*

Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the

work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.

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

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.*

Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

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

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

REASON: *To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and*

ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

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: *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*

Alexander Smith
Environmental Health Officer



Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

[REDACTED]

Date 19 February 2024

Our Ref DS/SUDS24/0010

Your Ref PT_AT/23/01417/FULMAJ

Subject 1-8 Long Lane London EC1A 9HF

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has reviewed the Sustainable Drainage Strategy P2 for the above application and would recommend the following conditions should the application be approved:

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, schematic and layout drawings for the proposed SuDS components including but not limited to: attenuation systems (including blue roofs), rainwater pipework, flow control devices, pumps, design for system exceedance, design for ongoing maintenance including silt removal; surface water flow rates shall be restricted to no greater than 1.7 l/s, provision should be made for an attenuation volume capacity capable of achieving this;
- (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.
- (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

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.

From: [REDACTED]
To: [REDACTED]
Subject: 23/01417/FULMAJ 1-8 Long Lane London EC1A 9HF - TfL comments
Date: 21 February 2024 14:29:58
Attachments: [Outlook-eyvlesop.png](#)

THIS IS AN EXTERNAL EMAIL

Dear City of London planning,

Thanks for consulting us on this planning application:

23/01417/FULMAJ

1-8 Long Lane London EC1A 9HF

Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

We have the following comments:

The site is located on a strategic cycle route, Quietway 11, which passes immediately outside of the site, currently in an advisory on-carriageway cycle lane. This is not acknowledged or mentioned anywhere in the application materials.

Long Lane is not part of the Transport for London Road Network (TLRN) and TfL is not the highway authority.

We note that colleagues from within TfL have commented separately on LU infrastructure protection matters. Please consider and reflect their comments carefully.

The submitted Outline Construction Logistics Plan (CLP) shows no drawings or proper proposals for how access by construction vehicles will actually work. These may be proposed to access via the existing crossover onto Long Lane.

The proposal mentioned vaguely for construction access vehicles to use existing on-street bays across the street does not sound safe or workable, although very little detail has been provided on it to enable proper assessment. Specifically, it may be unsuitable and cause unacceptable highway safety risk to cyclists using Quietway 11 during construction.

The existing on-street parking and loading bays across the street on Long Lane should be surveyed for existing levels of occupancy prior to determination. As many of them as possible should be reduced/removed in the final local highway arrangement.

Drawings in the Design & Access Statement show cycle new on-street cycle parking stands on Long Lane close to its junction with A1 Aldersgate Street. The City Corporation should

secure these and other improvements via a Section 278 (S278) agreement for local highway works.

However no drawings have been provided for a proposed package of S278 works to support the scheme, which is unacceptable.

Where would cycling access to cycle parking within the scheme actually take place from? In terms of the relationship with adjacent highway. Again, can a drawing or more spatial information be provided?

Overall, we currently object to the scheme due to a lack of sufficient information and because no enhancements are proposed to Quietway 11 immediately adjacent to it.

Specifically we would strongly recommend production of drawings to show a workable proposed arrangement for construction access, which should be subject to a Stage 1 Road Safety Audit (RSA) and Designer's Response prior to determination. In the absence of such drawings we currently object to the outline CLP due to highway safety concerns.

We also recommend schematic or concept design drawings are produced to show a package of Section 278 (S278) works to support the scheme, enhancing Quietway 11 as required by London Plan policy T5 (Cycling). This should cover both sides of Long Lane between its junctions with Cloth Street and A1 Aldersgate Street.

The carriageway should be resurfaced at least.

A traffic survey, which can be a spot check, should also be carried out in order to enable assessment of this stretch of local highway against the TfL Cycle Route quality criteria (see <https://content.tfl.gov.uk/cycle-route-quality-criteria-technical-note-v1.pdf>)

The current advisory cycle lane is only acceptable as a Quietway on parts of London's highway network with certain features and traffic flows, as application of the criteria Check can show.

Should the Check demonstrate that more significant highway works are needed outside the development site to make necessary improvements to Quietway 11 (e.g. enhanced segregation), those works should be secured from this development proposal. This may be achievable at relatively low cost, for example using wand or armadillo cycle lane separators.

We would also recommend that the City Corporation considers requesting and having designed up carriageway narrowing and footway widening and replacement wherever possible at this location, in addition to the reduction i.e. removal of on-street vehicle bays referred to above.

Subject to further clarification being provided on construction access and an acceptable package of S278 works enhancing Quietway 11, the cycle parking quantum and access arrangement proposed could be deemed acceptable on balance, even despite the proposal to limit general access to the basement by hotel guests, so they would be reliant on hotel staff to take their bikes there, which is undesirable.

Thanks and kind regards,

Gavin McLaughlin MSc; MA; MRTPI

Spatial Planning | City Planning

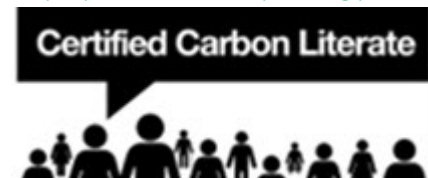
Construction Logistics Planning (CLP) - Advanced, CIHT/TfL-accredited course

[REDACTED]

[REDACTED]

PLEASE CONFIRM ALL MEETINGS BY CALENDAR

TfL Spatial Planning is committed to equity, diversity and inclusion and we strive to ensure that Londoners are fully represented in the planning process.



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Representing the interests of Barbican Residents

BA Planning Sub-Committee
c/o 343 Lauderdale Tower
Barbican
London EC2Y 8NA

The City Planning Officer
Department of the Built Environment
City of London
PO Box 270,
Guildhall
London EC2P 2EJ

28th February 2024

For the attention of Ms Anna Tastsoglou, Principal Planning Officer (Development Management)

Objection to application: 23/01417/FULMAJ; 1-8 Long Lane

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Dear Ms Tastsoglou,

We are writing on behalf of the Barbican Association, a Recognised Tenants 'Association representing residents of the Barbican Estate, to object to the above application on the grounds of 1) its unacceptable height and mass 2) the consequent loss of residential amenity on the grounds of loss of light, overlooking and noise pollution and 3) the dangerous impact on traffic flow and cyclist and pedestrian safety. We would note that we have asked the developers via Concilio Communications to respond to questions regarding our concerns and it is disappointing to note that a response still remains unforthcoming as at the date of this letter ie. the application's Standard Consultation Expiry date of 28th February 2024.

Taking each of our concerns in turn:

Unacceptable height and mass

This application represents a substantial overdevelopment of the space with an increase in total floorspace of a hefty 64% compared to the footprint of the existing buildings. Whilst we are

aware that the previous office development scheme was consented for the site at 1-12 Long Lane, we remain of the opinion that the height and massing of the revised proposals for this smaller site at 1-8 Long Lane are still inappropriate for this setting and hence that reductions to both are necessary.

Part 7 of the Design & Access Statement states that “*The project team has worked hard to design a building that sits within its local context..... Our proposed building, excluding plant equipment, is approx. 350mm lower than the 2021 consented scheme*”. However, Part 1 of the Heritage Townscape and Visual Impact Assessment goes on to say that “*the Proposed Development sits **slightly outside** the massing of the consented scheme, to allow for circulation at upper levels and to comply with the updated fire regulations*” – but nowhere does it seem to say how much outside of the massing this new proposal is. Indeed, in the submitted documents it states “*at the stepped back upper levels the proposed footprint has extended beyond this massing in order to provide adequate circulation and functionality of the hotel guestrooms at these levels. We have also complied with the London Plan requirement to extend the secondary evacuation lift up to 8th floor.....*”.

This suggests that the proposed scheme is **actually one floor higher** than the previously consented scheme and may help to account for at least part of the 64% increase in the massing. The submitted documents are unhelpful in clarifying this issue.

The proposed height and volume of the building will clearly be at odds not only with the historic character of the area but also and more significantly with the height-line of the other buildings in Long Lane. As such it will set an unwelcome precedent for other potential developments in the area. The building will be higher than the Kaleidoscope Building OSD at the Elizabeth Line station and will continue to overshadow both neighbouring properties and the historically significant Charterhouse and Smithfield Conservation areas. Indeed, the accompanying documentation confirms that “*Our proposed building, **similar** to the height of the consented scheme, **reflects a new datum** for Long Lane.....*”.

As we pointed out in our objection to the previous application, the Elizabeth Line OSD set a new reference height for buildings at the other end of Long Lane, and we are concerned that the increasing height of new developments along Long Lane will just continue to be perpetuated. We would remind that Policy HS3 of the Draft City Plan 2040 states that “*the **cumulative impact** of planning applications for individual developments on the amenity of existing residents will be considered*”. This is clearly not the case here. Our view remains that the height of this proposed development should be restricted either to its existing height, or to that of the Kaleidoscope Building, whichever is the greater.

Loss of residential amenity

In the emerging Draft City Plan 2040 in Policy HS3: Residential Environment it states that: “*All development proposals should be designed to minimise overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation. Light spill from development that could affect residential areas should be minimised, in line with policy DE9.....*”

Although not yet formally adopted, the emerging Draft City Plan 2040 should carry considerable weight, partly because it has been so long in production and the policies on

residential protection have been there (unchallenged) since the first iteration. We note that the Corporation's Planning and Transportation Committee voted overwhelmingly to approve the plan at its meeting of 31st January 2024 and will now go before the Policy and Resources Committee and Court of Common Council for consideration.

This application concerns us given the loss of residential amenity, particularly in terms of loss of light, overlooking, loss of privacy and noise and light pollution – all in contravention of Policy HS3 as detailed above.

Roof terraces and balconies

Policy DE5 of the emerging Draft City Plan 2040, Terraces and Viewing Galleries states that roof terraces will be encouraged where *“there would be no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity. Where there is a potential for a significantly adverse impact, the use of an extensive green roof and a restriction on access should be considered as an alternative...”*

We would also point out that Policy CV5 of the emerging Draft City Plan 2040: Evening and Night-Time Economy states that *“Proposals for new evening and night-time entertainment and related uses and the extension of existing premises will be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:*

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

We are concerned that the existence of the outside spaces put forward in this application are in potential contravention of these policies and will cause significant harm to the amenity of residents in the near vicinity. The Planning Statement states at Point 7.94 *“On upper floors of the Proposed Development, guest rooms include a private ‘garden’ for guests to use. The depictions of this “private garden” show its location to be at the Eastern end of the building ie. the closest point to the many residential flats both in the Barbican Estate and the wider locality. The same issues arise with the proposed use of the “pocket park” at street level.*

The accompanying documents state *“In addition to the above initiatives offered by the hotel, as illustrated in the submitted Landscape Design and Access Statement, there is the potential for the public realm within the Proposed Development to offer a meaningful contribution towards a Cultural Strategy. The cultural offer could be realised through the following: engagement with or commission of local artists to make use of the space for temporary features; **performance within the landscape setting...**”*

Given the obvious concerns that the existence of these outside spaces would raise, it is disappointing that the applicant has provided no accompanying details as to the timing and scale of their proposed use – an important omission indeed. What is meant by *“performance within the landscape setting”*? How many guests will be able to use these outdoor spaces? Will the general public be able to use them? At what times? Will parties/groups be allowed? Are outside events planned here? If so, what type? Will music be played? These are significant omissions from the application.

We note that the prior planning application was consented in 2021 but, significantly, with conditions attaching to it which restricted, inter alia, the use of the terraces on the office development to between 8am-9pm on weekdays only. No live, amplified or other music was to be played on the roof terraces and no promoted events were to be allowed on the premises. These conditions were imposed in order 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.”

Should this current hotel application be approved, we would suggest that such conditions – but with stricter time limits - should also be applied to this application in order to protect the amenity of the many residential flats in the near vicinity.

Loss of light

In terms of loss of light, overshadowing etc, the **Daylight and Sunlight** analyses throw up the usual conclusions. For Seddon House, Lauderdale Tower and John Trundle Court the effects of the proposed building on daylight and sunlight are all deemed to be “*within the recommendations of the BRE guidelines. The effects are therefore considered negligible*”.

We would point out however that what developers deem to be “negligible” losses of light are clearly not the same as what is considered negligible to the property occupants impacted by the overdevelopment of this space. Policy DE8 of the emerging Draft City Plan 2040: Daylight and Sunlight states that “*Development proposals should have regard to the daylight and sunlight levels of historic interiors and should seek opportunities to improve daylight and sunlight levels where this would be achievable and appropriate*”. This is clearly not the case in this application.

Dangerous implications for traffic flow and cyclist and pedestrian safety

In the emerging Draft City Plan 2040 in Policy HS3: Residential Environment it also states: “*The amenity of existing residents will be protected by resisting uses that would cause unacceptable disturbance from noise, fumes and smells and vehicle or pedestrian movements....*”

We would remind that Long Lane is a busy, narrow and already congested road, with eight short stay car parking bays (seemingly always fully occupied) on the opposite side of the road to the hotel and with a narrow cycle lane on the same side (ie. eastbound towards Aldersgate Street) and directly in front of the proposed entrance to the hotel. The increased traffic generated during construction, then continued by guests and hotel service vehicles will inevitably worsen the already poor air quality in the area, increase noise pollution and endanger motorists, pedestrians and cyclists.

Part 10 of the Design & Access Statement - SITE ACCESS & ENTRANCES confirms that “*The main guest access to the hotel is off Long Lane. The retail unit will also be accessed from Long Lane*”. We note that “*Delivery access will be the south of the site on Long Lane with goods in to the rear of the building at GF level*”. It continues “*Some guests, visitors and staff may utilise taxis and minibuses to arrive to the Site. These vehicles accessing the Site **will be***

required to make use of the section of single yellow line kerbside adjacent to the Site on Long Lane to pick-up/drop-off guests, also being able to make use of parking bays on Long Lane for set down purposes. Due to the spatial constraints of the Site, it is not possible to afford taxi set-down areas on-site. Note that black cabs and other vehicles rely on a kerb on which to deploy their built-in ramps, and community transport vehicles often have a large wheelchair-platform lift at the rear”.

We would point out that this “single yellow kerbside adjacent to the site” is a narrow cycle lane. Cyclists facing stationary taxis dropping off passengers to the hotel will have to swerve into oncoming traffic to avoid these – which is both unacceptable and highly dangerous.

The Transport Statement confirms these plans “*Taxi and Coach Pick-up / Drop-off 5.33 Taxis undertaking pick-up/drop-off activity to the Site will be able to make use of the single yellow line kerbside adjacent to the Site....*”.and then goes on to pass on the responsibility for the monitoring of taxi activity to hotel staff....” *The hotel reception will be located directly opposite this location and will be able to monitor taxi activity at this frontage to ensure that vehicles do not dwell on-street and utilise this kerbside location for short set-down/collection purposes only.*

In theory this may sound just about plausible but how on earth can this work effectively in practice? What if the receptionist is busy? Will a taxi driver really take notice of someone with no authority to move them on? This is clearly unworkable and has not been properly thought through. As for the possible arrival of guests by coach, “*The hotel will advise upon bookings being taken that there is **limited opportunity for coaches** to unload guests and will advise visiting coaches to utilise larger loading locations such as the significant provision of loading bays on West Smithfield circa 120m west of the Site...*”

“Limited opportunity”? We would point out that there is NO opportunity for coaches to unload guests in such a restricted and narrow road in a location in a cycle lane just ahead of traffic signals at the busy junction with Aldersgate Street rather than “limited opportunity”.

In the consultation meeting with residents held on 25 September 2023, the developers said that they did not envisage that many guests would need to use taxis given that so much public transport was available in the near vicinity. Consequently, we were told that only one pick up/drop off space would be provided. In an earlier meeting held with the local Common Councillors on 11th July, this same sentiment had been expressed ie. that although the developers expected guests to make use of the excellent public transport links there would be a taxi drop-off bay in the proposals. The inference was that a taxi drop off bay would be located in the rear service road. We now find this is not the case – why not?

The applicant seeks to justify this lack of safe and dedicated taxi drop off point in the Transport Statement by comparing rates of drop off and pick ups at two so-called comparable hotels in London. However, the statement then goes on to admit that “While it is noted that the sites selected are not within the CoL (due to a lack of comparable recent hotel survey data on the TRICS database), the **sites selected are in highly accessible locations**1-8 Long Lane is NOT a highly accessible location and hence these comparisons are worthless.

We are not against the redevelopment of the site per se but the problems of access do cause us some concern. We do agree that hotel guests will be likely to use the excellent nearby transport links....but that is most likely once they have arrived. We believe that many guests, particularly

those from overseas, will prefer to take a taxi or similar on arrival and departure so as to avoid having to carry luggage on public transport with which they may be unfamiliar. As we have pointed out, Long Lane is a narrow street that already carries a high volume of pedestrians, cyclists and motor vehicles on an important through route in the City. A hotel will inevitably add significantly to traffic volumes and the prospect of taxis blocking the cycle lane and part of the carriageway while guests load/unload baggage and pay the driver will surely bring about traffic chaos.

We would also note that a hotel, by its very nature, will have more people and servicing movements than an office development which will inevitably increase traffic volumes. In addition, the location is also in close proximity to the Smithfield gyratory system and could disrupt key deliveries and market operations to this essential business area. As is the case with the use of outside spaces, the previously approved office scheme had conditions regarding servicing attaching to the consent. These conditions stated that no servicing of the premises were to be carried out between the hours of 23.00 on one day and 07.00 on the following day on weekdays, with more restrictive times applied at weekends and Bank Holidays. This servicing condition “*includes the loading and unloading of goods from vehicles and putting rubbish outside the building. REASON: To manage traffic, avoid congestion and manage the safe and convenient movement of pedestrians and cyclists in the area and to reduce air and noise pollution, in accordance with the following policies of the Local Plan: DM15.7, DM16.1, and DM16.2, DM21.3*”. We would expect similar such conditions to be attached to any consideration of this application.

Summary

In summary, we object to the revised plans and would request that the height of the development be further reduced, at least to match the height of the Kaleidoscope Building and neighbouring properties, in order to prevent unacceptable levels of overshadowing and loss of residential amenity in what are significant and historic Conservation Areas. We also have concerns over the potential use of the external spaces and request that, **should this current hotel application be approved, conditions over their use and timings be applied in order to protect the amenity of the many residential flats in the near vicinity**. We also have severe misgivings over the access plans for guests to the hotel, with the lack of a dedicated drop-off point in the service road at the rear of the property suggesting not only traffic chaos in this narrow lane but also significant danger to cyclists and pedestrians.

For all of the reasons discussed in this letter, we reiterate our objection to this application in its current form.

Yours sincerely,

Jane Smith – Chair, Barbican Association Planning Sub-Committee

Sue Cox – Deputy Chair, Barbican Association Planning Sub-Committee

From: Varma, Vimal [REDACTED]
Sent: Saturday, March 2, 2024 10:48 PM
To: Tastsoglou, Anna [REDACTED]
Cc: Turner, Lee [REDACTED]
Subject: 23/01417/FULMAJ - 1-8 Long Lane

Hi Anna,

The waste storage and collection facilities indicated in The Delivery, Servicing and Waste Mgt Plan, December 2023, and Drawing No. 11246-EPR-ZZ-00-DR-A-TP-0200 Rev P01 comply with our requirements. This Division will, therefore, raise no objections to this application.

Please note,

1. Small refuse vehicle is expectable on this proposal but architects need to work with standard RVC dimensions.
2. Waste store to be built to BS5906 specifications.
3. Waste bins cannot be left on the highway for collection.

Thanks

Vimal

-----Original Message-----

From: [REDACTED]
Sent: Wednesday, January 31, 2024 9:37 AM
To: Varma, Vimal [REDACTED]; Turner, Lee [REDACTED]
Subject: Planning Application Consultation: 23/01417/FULMAJ

Dear Sir/Madam

Please see attached consultation for 1-8 Long Lane London EC1A 9HF .
Reply with your comments to HYPERLINK "<mailto:PLNComments@cityoflondon.gov.uk>"
PLNComments@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Anna Tastsoglou
Environment Department
City of London

From: Salt, William [REDACTED]
Sent: Tuesday, March 5, 2024 2:20 PM
To: Tastsoglou, Anna [REDACTED]
Cc: Patricio, Taluana [REDACTED]
Subject: 23/01417/FULMAJ: 1-8 Long Lane - Transport Observations

Hi Anna,

I have managed to take a look at 1-8 Long Lane and can provide the following comments:

Trip Generation

- The applicant has undertaken a net trip generation assessment, and it has been demonstrated that there would be a net reduction in peak hour user trips associated with the proposed development.

Servicing

- It has been proposed by the applicant to retain the existing servicing function of the site. An off-street loading bay would be provided which is in accordance with CoL policy.
- The proposals would consolidate the 2x existing crossovers into one and this approach is supported.
- The size of the loading bay is constrained; the loading bay would be big enough to cater for vehicles including: 3.5t box van, 4.6t panel van and small refuse vehicle (and no larger).
- The site frontage along the site is a designated Quietway and is therefore not suitable to facilitate on-street deliveries, nor is it CoL policy to accept such in any event.
- The applicant notes that, "*The existing Site typically sees servicing activity undertaken on-street adjacent to the Site, with the existing on-site parking areas not providing sufficient space for servicing activity*". The applicant therefore accepts the on-site limitations with respect to the size of vehicles that can be accommodated, and the corollary impacts currently experienced on-street as a result. On-street servicing is not acceptable per CoL policy. A condition limiting the size of vehicles accepted on site will therefore be required to prevent the existing issues continuing. The proposed Delivery Booking System would enable this to be enforced by on-site management. This should be secured via the s106.
- The applicant has demonstrated via Swept Path Analysis that these vehicles (3.5t box van, 4.6t panel van and small refuse vehicle) can be accommodated on site.
- The applicant notes that the proposals are forecast to generate a daily servicing demand of 3-5 vehicles. A daily vehicle cap of 4 should be applied by condition (with cargo bikes being exempt). This should be secured via the s106.
- The applicant notes restricted servicing hours per CoL policy and servicing by vehicles will not be permitted between 07:00-10:00, 12:00-14:00, and 16:00-19:00 (with cargo bikes being exempt). This should be secured via the s106.

Highway Boundary / S278

- A GA plan has been submitted but is lacking in required detail.

- The plan should be updated to include highways boundary information and the applicant should confirm this has been drawn per Standards for Highways. If not, the plan will need to be updated accordingly.
- The package of works should include proposals to improve the cycle lane which routes along the frontage of the site.
- No doors are permitted to open outwards onto public highway.
- No short stay cycle parking is permitted on CoL highway and the applicant should review the current proposals to make use of private land (pocket garden and / or on-site).

Blue Badge Car Parking

- No blue badge parking is proposed to be provided on site.
- An existing on-street space is referred to, but London Plan requirements require one new space to be provided on-site in the interests of accessibility.

Cycle Parking

- It is noted that cycle parking would be provided in line with London Plan requirements.
- Cycle parking will be accessible via a lift, which exceeds the minimum required size of 2.3m x 1.2m as per the London Cycle Design Standards (LCDS), as well as stair access from ground floor.
- Can the applicant confirm how the spaces for larger cycles would be accessed noting the space requirements for manoeuvres of these larger cycles.
- The applicant notes, *“The cycle spaces are provided for both staff and visitors to the hotel, however, to increase the security of the basement and to avoid accessibility issues, the cycle store will only be directly accessible by staff. Visitors will be able to use the cycle store by presenting their bicycles to the hotel reception. Staff will then wheel the cycles to the basement accessing the cycle store. Guests will then be able to ask staff to retrieve their cycle from the store when they depart the hotel or when they wish to use their bicycle during their stay.*
 - More information is required on this aspect, with particular regard to how the cycle parking availability would be advertised to guests.
- As noted, no short stay cycle parking is permitted on CoL highway.
 - The applicant refers to existing cycle parking however it is not clear what cycle parking they are referring to. Nevertheless, the applicant should amend the short stay cycle parking proposals to remove them from CoL highway.

Travel Plan

- It is considered that (both) a Travel Plan and Cycle Promotion Plan would not be required. A detailed Travel Plan is preferred in this situation when considering the proposed use(s). This document should however include specific measures to encourage the uptake of cycling as a mode of travel.

Delivery and Servicing Plan (General Comment)

- A detailed Delivery and Servicing Plan will be required and should be secured by condition, which clearly commits to the necessary servicing measures as outline above.
- A key focus of the DSP should be on measures to encourage use of cargo bikes given the servicing constraints noted. Servicing by cargo bike would be an appropriate solution for

the proposed retail use, and when considering the site's location adjacent to the cycle network.

Construction

- The outline CLP does not provide any drawings detailing how the site would be safely accessed during construction (with access suitably maintained for other users).
- The site is located adjacent to a Quietway which will be sensitive to any construction proposals.
- The applicant is advised to liaise with CoL Highways in advance of the detailed CLP (secured by condition) to ensure that project delays are avoided where possible. As no detail is provided within the outline CLP, CoL will not be responsible for any potential delays in this regard.
- An RSA of the proposals should be undertaken, and Designer's Response prepared.

Please let me know if you would like to discuss anything.

Many thanks,
Will



Will Salt | Transport Planning and Development Officer (Development Management)

Environment Department | City of London | Guildhall | London EC2V 7HH

Mob: [REDACTED]

[REDACTED] | www.cityoflondon.gov.uk

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2023

Memo

To Assistant Director (Development Management)
Environment Department

Email [REDACTED]

From Kyri Eleftheriou-Vaus
Air Quality Officer

Telephone [REDACTED]

Email [REDACTED]

Date 25/03/02/2024

Your Ref: 23/01417/FULMAJ



Subject: 1-8 Long Lane London EC1A 9HF

Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Detailed air quality modelling has been scoped out of the air quality assessment as the road traffic generated does not reach the threshold detailed in the IAQM Guidance and there is no on-site combustion plant proposed for heating and hot water. However a diesel generator is proposed for life safety purposes.

The development is considered to meet both the transport and building emissions benchmarks for the Air Quality Neutral Assessment.

Should the development be approved please attach the following conditions:

Condition M28C

Prior to the installation of any generator. A report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. Where it is not possible to deploy alternatives, any diesel generators must be the latest Euro standard available. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose and shall not be used at any other time.

Reason

In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.

Condition M29

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.

Condition M32 NRMM

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.

Informatives

Roof gardens

The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP.

In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to

any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

Compliance with the Clean Air Act 1993

Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

Generators and combustion plant

Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: [Medium combustion plant and specified generators: environmental permits - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/medium-combustion-plant-and-specified-generators-environmental-permits)

APPLICATION COMMENT FORM

From: Ben Bishop, Environmental Resilience Officer

Application No: 23/01417/FULMAJ

Development Management Case Officer: Anna Tastsoglou

Site Address: 1-8 Long Lane London EC1A 9HF

Proposal: Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.

Application Received: 22nd December 2024

Request for Comment Received: 27th March 2024

Comment:

Application submission documents relating to climate change resilience and adaptation have been reviewed, including:

- Sustainability Statement (Arup Dec 2023)
- Design and Access Statement (EPR Architects Dec 2023)
- Landscape Design and Access Statement (Farrer Huxley 2023)
- Energy Statement (Mactaggart Third Fund and Ian Mactaggart Trust Dec 2023)
- PEA and BNG assessment (Ecology Partnership Dec 2023)
- Drainage Strategy (Elliot Wood Nov 2023)

Overheating and the urban heat island effect

There is one specific reference to urban heat island in the Sustainability Statement, although the report does refer to Policy CR1 in the policy review. Landscaping at roof level will be utilised to manage microclimate and 'mitigate urban heat'. Analysis of the design parameters suggests that structural design covers projected climate change scenarios, including the increased risk of overheating.

In the Energy Statement the approach to internal cooling and overheating has been outlined, and follows the London Plan's 'Cooling Hierarchy'. Internal management of heat gain includes: use of low heat output lighting, reduction of standing heat loss through insulation and energy efficient equipment to reduce heat gain. To reduce summer solar gains the following mitigation methods are proposed: facades developed with suitable glazing to rations, in particular on south facing aspects; suitable g-values will be specified and bedrooms fitted with internal shading. Passive ventilation has been deemed unfeasible due to the adverse acoustic impact on building users. Mechanical ventilation has been identified as suitable likely to be located at roof level to provide fresh air flow which will support the regulation of internal temperatures.

The proposed development is in Flood Zone 1 and has been assessed to be at low risk of flooding from all sources. The proposed SuDS strategy

Date &
Initials

APPLICATION COMMENT FORM

reduces surface water runoff by 94.5% in the 1 in 100-year return+40% climate change allowance, therefore a significant betterment from the existing case. Proposed measures include: a rainwater harvesting system; attenuation of rainwater with green/blue roof on the 9th Floor level, with a total catchment area of 396m²; and storage within the basement in attenuation tanks working in conjunction with the blue roof. Foul water appliances within the basement are to be pumped to a suspended drainage network at high level in the basement which will reduce the risk of flooding to the basement as a result of sewer surcharge.

Water stress

In the sustainability statement there are reference to rainwater harvesting systems, however there are no specified uses outlined. Specification of low consumption sanitary fittings are mentioned in Energy Statement in line with Wat 01 credit.

Biodiversity and pests and diseases

The site baseline is of low ecological value containing a small amount of introduced shrub in the redline boundary. A total of 0.16 units are expected to be achieved through the landscaping proposed for the 0.0794 ha development (calculated by the statutory metric), an expected 12,275% uplift. Five key cover in the soft landscaping of the development, 'biosolar' green roof, wildflower green roof, a balcony planting mix, green walls and flower-rich perennial planting (at street level). Habitat area totals: green roof (0.0237ha), flower-rich perennial grassland (0.0023ha), six new trees and green walls (0.0026ha). further enhancements include artificial nesting infrastructure for birds and wild bees. Green roof measures include: Loggeries and natural deadwood to provide respite for insects and pollinators; bug hotels; bird baths; areas of bare sand for solitary bees and other insects/pollinators to nest. Tree pallet includes *Malus baccata* which can provide nectar/pollen for pollinators and *Ulmus 'columella'* which is a disease resistant species of elm which has potential to support a London priority butterfly species white letter hairstreak. Species mixes supplied for ground and terrace level planting contain a mix of recommended species that have good ecological value and are appropriate for the conditions and expected conditions. This will compliment species utilised in wildflower mix for roof level planting.

No formal mention of the future impacts of emerging pests and diseases.

Food, trade and infrastructure

The proposed development is highly accessible by non-car modes, with good provision for pedestrians, cyclists, and public transport users in the surrounding area and will be car-free, with staff travelling by active and sustainable means. Any guests arriving by car being able to utilise local on-street and private parking opportunities. The proposal suggests it will reinstate high quality level footways along the site frontage, promoting active travel.

Recommendation:

APPLICATION COMMENT FORM

The proposed development **is not** compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2036 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2036 Policies CR1 and CR2.

The following condition **is recommended** to provide details of how the development has responded to risks from climate change; this condition may be fulfilled by a satisfactory assessment in support of the BREEAM Wst 05 credit:

Prior to the commencement of the development (other than 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 flooding, 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 and managed in accordance with the approved CCRSS for the life of the development.

BB

18/04/24