

From: 
To: 
Cc: 
Subject: 24/00176/FULL - 45 Beech Street
Date: 29 February 2024 13:50:46

Hiya Sam,

Thanks for your time earlier, was good to chat through the generator points. Another point to check is that consultation with the City Corporation is detailed within the air quality assessment; The assessment follows a methodology outlined to The City of London Corporation via the project team's planner in November 2023. Do you know if this was sent over to Kyri or myself in air quality? As there are a few points stated that we probably would have challenged.

In terms of the planning application 24/00176/FULL 45 Beech Street, I've reviewed the Air Quality Assessment and other relevant documents that have been submitted and have a number of comments prior to being able to finalise a decision on the application.

Is it possible to share the following with the applicant. Happy for my contact details to be shared with the air quality consultant if they have any questions or wish to discuss any of the comments. Comments marked (R) require a response, those marked (I) are for information only.

- Operational Phase Impact Assessment:
 - Impacts at Existing Receptors:
 - In paragraph 7.1 of the AQA there is no mention of the 2,920 vehicle proposed vehicle trips detailed in the AQ Neutral assessment. Have these been considered when assessing the impact of the development on local roadside air quality? (R)
 - Impact of Existing Emissions on Proposed Development:
 - The main entrance to the development fronts Beech Street at a location where one side of Beech Street tunnel is open, therefore a location where vehicle emissions contained within Beech Street tunnel can ventilate out to the wider atmosphere. The reference to Defra, 2022 regarding the fall off of NO₂ concentrations from source cannot be stated with certainty at this location. There are a high number of limitations associated with the Defra methodology, and associated tool, as it has not been developed with a one-sided tunnel break in mind. We would require further justification that the proposed development, especially the façade fronting Beech Street is suitable for residential occupancy. (R)
 - What is the lowest level where openable vent panels are located? It would appear from page 77 on the Design and Access Statement these are to be from the first floor upwards. Similar to the point above, we would require further justification that the proposed development, especially the façade fronting Beech Street is suitable for ambient venting. (R)
 - It is stated within the planning documents that ventilation is to be provided through MVHR, please can it be confirmed where all air inlets for the MVHR are proposed to be located and the predicted pollutant concentrations at these locations. (R)
- Assessment of Proposed Emergency Generator:

As detailed in the pre-planning AQ checklist, [Planning and air quality - City of London](#), alternatives to diesel generators designed to be used in an emergency should be investigated at the design stage. Has an assessment been completed to identify possibly alternatives? (R)

- The flue for the proposed generator is at a height of 2.5m and the location is enclosed on all four sides by Bryer Court, Bridgewater House and the development, with building heights far greater than that of the flue, 20-34m approx. As detailed in the pre-planning AQ checklist, [Planning and air quality - City of London](#), generator flues should terminate above the tallest part of the development. This is stated in the AQA as point 8 of para 2.42 on page 15. (R)
- It is stated that the proposed generator will conform to Stage V emissions standard. The technical specification for the model of generator provided, [PTVS-D-385ST](#), states compliance with Stage II and not Stage V. If this generator does in fact confirm to Stage V please provide appropriate evidence. (R)

Kind regards,

Paul



Paul Bentley

Air Quality Officer

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



www.cityoflondon.gov.uk

Bob Roberts

Interim Executive Director Environment

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Historic England

Mr Samuel James
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3764

Our ref: P01573402

29 February 2024

Dear Mr James

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

**45 BEECH STREET LONDON EC2Y 8AD
Application No. 24/00176/FULL**

Thank you for your letter of 27 February 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

Telephone 020 7973 3700
HistoricEngland.org.uk





Historic England

Charlotte Cartwright

Business Officer

E-mail: [REDACTED]



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

Telephone 020 7973 3700
HistoricEngland.org.uk



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Memo

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

Email: [REDACTED]



From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection

Telephone [REDACTED]

Email [REDACTED]

Date 01 March 2024

Our Ref 24/01341/NPLN

Your Ref 24/00176/FULL

Subject 45 Beech Street London EC2Y 8AD

Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Thank you for your memorandum. I have reviewed the application and I recommend that the following conditions be attached to any consent:

No live or recorded music shall be played at such a level that it can be heard outside the premises or within any residential or other premises in the building.

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.

No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3

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Switchboard 020 7606 3030

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

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

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

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

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.

All residential premises in the development shall be designed and constructed to attain the following internal noise levels:

Bedrooms- 30dB L_{Aeq,T^*} and 45dB L_{Amax}

Living rooms- 30dB L_{Aeq, T^*}

*T- Night-time 8 hours between 23:00-07:00 and daytime 16 hours between 07:00-23:00.

A test shall be carried out after completion but prior to occupation to show that the criteria above have been met and the results must be submitted to and approved in writing by the Local Planning Authority prior to occupation of any part of the building.

REASON: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3 and D21.5.

Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used so that the noise level in the bedrooms does not exceed NR30 attributable to the non-residential uses of the ground floor and/or basement levels. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter.

REASON: To protect the amenities of residential occupiers in the building in accordance with the following policies of the Local Plan: DM21.3, DM21.5.

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 commercial or communal kitchen use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class A use takes place.

REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

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.

Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to

air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.

REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.

All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

The roof terraces on level 9 hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 08:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.

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

No amplified or other music shall be played on the 9th floor terrace or other external amenity space.

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.

Regards



Donal Rooney

Environmental Health Officer
Pollution Team

Dept. of Markets & Consumer Protection
City of London, PO Box 270,
Guildhall, London, EC2P 2EJ

Mob: 

Begum, Shupi

From: PlanningGatewayOne [REDACTED]
Sent: 05 March 2024 07:49
To: PLN - Comments
Subject: RE: Planning Application Consultation: 24/00176/FULL (Our Ref pgo-4899)

THIS IS AN EXTERNAL EMAIL

Good Afternoon,

Thank you for consulting HSE for this application.

Unfortunately, due to the lack of a fire statement, we are unable to carry out an assessment for this application.

Regarding the above planning application, the associated documents have been reviewed and I can confirm that the application does not include a fire statement form.

We note that the application includes a document described as a fire strategy, which has been prepared to satisfy London Plan policy requirements.

From 1 August 2021, any application for planning permission for development that includes a relevant building is required to include a fire statement. The legislation requires that a fire statement must be submitted on a form published by the Secretary of State, or a form substantially to the same effect, and include the particulars specified or referred to in the form. This requirement is separate to demonstrating compliance with London Plan policy.

We aim to respond to enquiries within 21 calendar days from receipt of the fire statement.

The fire statement form and guidance on the completion of a fire statement, published by the Secretary of State, are available on https://www.gov.uk/government/publications/planning-application-forms-templates-for-local-planning-authorities#attachment_5407285

Further HSE guidance on planning gateway one can be found here:
<https://www.hse.gov.uk/landuseplanning/fire-safety.htm>

Therefore, a completed fire statement, as described above, is needed to carry out an assessment of this application.

Kind Regards

Suki Sanghera



Sukhvinder Sanghera (Mrs)
Operational Support | Planning Gateway One | Building Safety Regulator

Health and Safety Executive, Nicker Hill, Keyworth, Nottingham, Nottinghamshire NG12 5GG

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

From: PLNComments@cityoflondon.gov.uk

Sent: Monday, March 4, 2024 4:16 PM

To: PlanningGatewayOne

Subject: Planning Application Consultation: 24/00176/FULL

Dear Sir/Madam

Please see attached consultation for 45 Beech Street London EC2Y 8AD .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Samuel James
Environment Department
City of London

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Begum, Shupi

From: James, Samuel
Sent: 06 March 2024 11:21
To: PLN - Comments
Subject: Fw: 24/00176/FULL - 45 Beech Street

From: Varma, Vimal [REDACTED]
Sent: 06 March 2024 10:32
To: James, Samuel [REDACTED]
Cc: Turner, Lee [REDACTED]
Subject: 24/00176/FULL - 45 Beech Street

Hi Sam,

The waste storage and collection facilities indicated on Drawings No. 22170 AHMM XX GF DR A PL120 Rev P00 and 22170 AHMM XX B1 DR A PL092 Rev P00 comply with our requirements. This Division will, therefore, raise no objections to this application.

Please note,

- 1 Bin store need to comply with BS5906 specifications.
2. FB2 or Budget lock to be put on ground floor waste store to allow collection crew access from the highway.

Thanks

Vimal

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

From: [REDACTED]
Sent: Tuesday, February 27, 2024 11:39 AM
To: Varma, Vimal [REDACTED] Turner, Lee [REDACTED]
Subject: Planning Application Consultation: 24/00176/FULL

Dear Sir/Madam

Please see attached consultation for 45 Beech Street London EC2Y 8AD .
Reply with your comments to [HYPERLINK \[REDACTED\]](#)
[REDACTED]

Kind Regards

Planning Administration

On behalf of

Samuel James
Environment Department
City of London

Begum, Shupi

From: Brown, Ella
Sent: 07 March 2024 15:25
To: James, Samuel; PLN - Comments
Cc: McCallum, Kieran
Subject: SUDS24/0016 - 45 Beech Street

Hi Sam / Keiran,

I've just been reviewing the drainage information submitted for 45 Beech Street (24/00176/FULL). Currently, the drainage strategy is not sufficient to allow us to recommend our standard conditions. Please could you forward on our comment below to the applicant so they can amend the report and we can re-review the information.

The Drainage Strategy prepared by Whitby Wood (Feb 2024) does not contain a sufficient amount of evidence to demonstrate that the applicant has considered all attenuation options to restrict the surface water discharge rate to greenfield rates, or as close to greenfield rates as possible.

Whilst we recognise that the nature of this application does constrain the options for SUDs, we would expect a 50% betterment on the existing rates to be a last resort. Therefore, the applicant should demonstrate an assessment of all the preferred options and their associated attenuation amounts (e.g. greenfield rate, <5 l/s) with clear justifications as to why these or not achievable before proposing a 50% betterment.

Many thanks,

 **Ella Brown** (she/her)
Environmental Resilience Officer
City of London | Environment Department | Planning & Development Division
Guildhall | London | EC2V 7HH
[REDACTED] | www.cityoflondon.gov.uk

To: [Redacted]
From: [Redacted]
Subject: [Redacted]
Date: [Redacted]

THIS IS AN EXTERNAL EMAIL.

Corporation of London
City of London
21 March 2024
Dear Sir/Madam
Re: 43, Black Street, Barham, London, EC7Y 1AD

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

There are public sewer crossing or close to your development. If your planning application work near our sewers, it's important that you minimise the risk of damage. We'd need to check that your development doesn't impair or obstruct water, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. [https://effi.ashdike.protection.network.com/](#)
If you have any queries, please contact our Planning Team on 0300 009 3913 (Monday to Friday, 9am to 5pm) or visit [https://www.thameswater.co.uk](#)

Water Consent
 Following initial negotiation, Thames Water has identified a stability of the existing water network infrastructure to accommodate the needs of this development project. Thames Water has contacted the developer in an attempt to agree a position on water networks but has been unable to do so in the time available and as such Thames Water request that the following conditions be added to any planning permission. No development shall be occupied until confirmation has been provided either: all water network upgrade required to accommodate the additional demand to serve the development has been agreed with Thames Water or a development and infrastructure planning plan has been agreed with Thames Water in accordance with the Local Planning Authority (LPA) consent. Where a development and infrastructure planning plan is agreed to occupation shall take place other than in accordance with the agreed development and infrastructure planning plan. Reason - The development may lead to an increase in demand for water supply and Thames Water will need to ensure that sufficient capacity is made available to accommodate additional demand arising from the new development. The developer can request information to support the discharge of this condition by visiting the Thames Water website or contacting our planning team. Should the Local Planning Authority consider the above recommendations appropriate or as a means to address it in the discharge notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department via email: devplan@thameswater.co.uk prior to the planning application approval.

The proposed development is located within 15m of a strategic sewer. Thames Water do NOT permit the building over or construction within the 15m of strategic sewer main. Any construction must be undertaken in accordance with the terms of the approved planning application. Unexcused access must be available at all times for the maintenance and repair of the sewer during and after the construction works. Reason: The proposed works will be close proximity to underground strategic sewer main, utility infrastructure. The works have the potential to impact on local underground utility infrastructure. Please read our guide working near our main to ensure your working will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. [https://effi.ashdike.protection.network.com/](#)

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within the 15m of water mains. If you're planning significant works near our mains (within 15m) we'd need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. [https://effi.ashdike.protection.network.com/](#)
Thames Water would recommend the following minimum pressure of this main (approx 1 bar) and a free rate of 15 litres/minute at the point where it leaves Thames Water pipes. The developer should take account of this minimum pressure in the design of the proposed development.

The proposed development is located within 15m of a strategic water main. Thames Water request that the following conditions be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface utility infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide working near our main to ensure your working will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. [https://effi.ashdike.protection.network.com/](#)

Your Authority
Development Planning Department
Thames Water
Magna Lodge SW9
Ducklake Way
Richmond, Surrey
TW9 1HQ

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You can contact [https://effi.ashdike.protection.network.com/](#)
If you have any queries, please contact our Planning Team on 0300 009 3913 (Monday to Friday, 9am to 5pm) or visit [https://www.thameswater.co.uk](#)
If you are unable to contact us, please contact the Local Planning Authority for further information. Please read our guide working near our main to ensure your working will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. [https://effi.ashdike.protection.network.com/](#)
If you are unable to contact us, please contact the Local Planning Authority for further information. Please read our guide working near our main to ensure your working will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. [https://effi.ashdike.protection.network.com/](#)

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Corporation of London Department of Planning & Transportation PO Our DTS Ref: 76232 Your Ref:
Box 270 Guildhall London EC2P 2EJ 24/00176/FULL
21 March 2024

Dear Sir/Madam

Re: 45, Beech Street, Barbican, London , EC2Y 8AD

Waste Comments

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

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement." Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Water Comments

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

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide ‘working near our assets’ to ensure your workings will be in line with the necessary processes you need to follow if you’re considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

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

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility

infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Yours faithfully

Development Planning Department

Advice to the local planning authority

Advice to the local planning authority (LPA) from the Health and Safety Executive (HSE) as a statutory consultee for developments that include a relevant building.

To LPA	City of London
LPA planning ref no	24/00176/FULL
Our ref	pgo-4928
Site address	45 Beech Street London EC2Y 8AD
Proposal description	Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.
Date on fire statement	19/01/2024
Date consultation received	08/03/2024
Date response sent	25/03/2024

1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

Headline response from HSE
Headline Response from HSE ('content')

Scope of consultation

- 1.1. The above consultation relates to the partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces.
- 1.2. 45 Beech Street is a 10-storey (plus basement) residential building with a height of 30.92m.

- 1.3. The development comprises a change of use from an existing office building to residential use. New structure is to be provided above the existing level 05 floor slab.
- 1.4. The proposed development is split across 11 floors (basement, ground floor and Levels 01 to level 09) and is provided with a firefighting stair (Stair A) and an escape stair (Stair B). The firefighting stair serves all levels and the escape stair serves all levels, except the basement.
- 1.5. The fire statement dated 19/01/2024, states the adopted fire safety design standard is BS 9991. HSE has assessed this application on that basis.

Consultation

- 1.6. Following a review of the information provided in the planning application, HSE is content with the fire safety design as set out in the project description, to the extent it affects land use planning considerations. However, HSE has identified some matters as supplementary information, set out below, that the applicant should try to address, in advance of later regulatory stages.

2. Supplementary information

The following information does not contribute to HSE's substantive response and should not be used for the purposes of decision making by the local planning authority.

Means of escape / fire/smoke curtains

- 2.1. Section 8 (6) of the fire statement states: *"Stair A discharges out to Beech Street on the ground level via a protected corridor, which also acts as the firefighting access corridor. The corridor is not lobby protected from the adjacent accommodation (reception desk, café/lounge, and co-working lounge); however, **fire/smoke curtains are to be provided** across all doors/openings to ensure the discharge route is protected in the event of a fire in the adjoining areas. The fire curtains over circulation routes are used in conjunction with physical fire doors, in order to provide additional resilience and protection against fire and smoke spread."*
- 2.2. The same section additionally states: *"Stair B discharges out to Bridgewater Street on the ground level via a protected corridor. The discharge route is separated from the café/lounge by a protected lobby and **separated from the shared kitchen by a set of fire doors and fire/smoke curtain** (in lieu of a protected lobby).
*Note: The fire curtains used on the ground level will not adversely impact means of escape provisions from the rooms – in the event of all fire curtains activating, all occupants are provided with escape routes which satisfy the relevant travel distance requirements."**
- 2.3. It should be noted that British Standard 7974 advocates that building design should firstly seek to eliminate fire safety hazards using construction and layout, rather than relying on active systems, building management processes and systems maintenance.
- 2.4. Where alternative fire engineered design solutions are justified, a qualitative design review (QDR) should be undertaken. This should include the assessment of 'what if'

events to identify foreseeable events that might have a significant influence on the outcome of the study. This may include fire safety system failures, management failures and/or workmanship failures.

- 2.5. Accordingly, it will be for the applicant to demonstrate that the proposed protection of the stairs by active systems and management procedures affords sufficient margins of safety. In this instance, however, should the QDR show that a sufficient level of safety has not been achieved by the installation of a fire and smoke curtain, the provision of an internal dividing wall, to overcome this issue, is unlikely to affect land use planning considerations.
- 2.6. The above is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Mechanical smoke ventilation

- 2.7. Section 8 (4) of the fire statement states: *“Levels 01-09, northern section of corridor: co-living rooms open into mechanically ventilated dead-end section of corridor. Maximum **single travel distance of 24.0m from furthest co-living room to Stair B** naturally ventilated lift lobby.*

The northern section of extended corridor is to be provided with a mechanical smoke shaft (extract) at the remote end of the corridor, with inlet air provided by the mechanical smoke shaft (inlet) in the corridor adjacent to the lift lobby and the AOV at the head of the stair. In this arrangement, the mechanical ventilation system is to be designed to protect the stair from smoke ingress and ensure that tenable conditions can be achieved within the full extent of the lift lobby and common corridor. Where mechanical ventilation is to be used, the performance of the systems is to be demonstrated by Computational Fluid Dynamics (CFD) modelling at a later design stage.”

- 2.8. This is noted. However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.

Fire service access and facilities

- 2.9. It is noted that Stair B is provided for means of escape with **Stair A as the firefighting stair**. The travel distance from the firefighting stair to the furthest flat entrance door appears to be circa 35m.

- 2.10. The cited fire safety standard, BS9991, refers in annex A.1 to the Smoke Control Association publication *‘Guidance on smoke control to common escape routes in apartment buildings’*. This states in relation to smoke control and firefighter safety: *‘...designers should be aware that single direction travel distances over 30m in length (measured from the staircase door to the furthest flat entrance door) in common escape routes are considered to present onerous conditions for fire fighters even if the flats are fitted with suppression systems’*.

- 2.11. This publication also contains a Forward from the National Fire Chiefs’ Council which states: *‘Whilst 30m might seem like an arbitrary figure to some, firefighting from long corridors can present exceptionally onerous conditions for firefighters.’*

- 2.12. Similarly, the British Standard relating to fire service intervention (PD7974-5) states: *'Irrespective of the corridor smoke control solution, FSE design should take into account the limitations necessarily imposed by firefighter physiology. Therefore, single direction travel distances within common corridors should not exceed 30 m between the furthest flat entrance door and the stairwell door'*.
- 2.13. Whilst it is noted that an additional means of escape staircase is provided, firefighting operations are launched from a 'bridgehead' within a firefighting shaft. Firefighters will, therefore, travel from a firefighting staircase to the remote flats to extinguish fires or rescue casualties. Floor plan drawings show flats which are in excess of 30m from the firefighting staircase.
- 2.14. This situation might be improved if stair B was the firefighting stair and thus reduce firefighter travel distance from the firefighting stair. In this instance it is noted that space has already been allocated for the firefighting shaft (Stair A) and the means of escape stair (Stair B) and this matter can be resolved without affecting land use planning considerations by way of, for example, reconfiguration of the firefighting shaft to include the relocation of the firefighting stair to reduce the travel distance for firefighters. However, any internal alterations will be for the design team to decide and it will be for the applicant to demonstrate compliance at later regulatory stages.

Sprinklers

- 2.15. Section 8 (7) of the first statement states: *"The basement level has an area exceeding 200m²; therefore, it is required to be provided with a smoke clearance system. It is proposed to achieve this via mechanical ventilation... Additionally, there are four doors from the basement which open directly to the outside, as well as a window from the gym.*

In accordance with BS 9991:2015, where a mechanical smoke ventilation system is provided, the sprinkler system should be in accordance with BS EN 12845. However, it is considered acceptable to use a Category 4 system in accordance with BS 9251:2021, using the enhancements outlined in BS 9251:2021 for non-residential accommodation based on the following:

A BS 9251:2021 Category 4 system did not exist at the time of BS 9991:2015. A BS 9251:2021 Category 4 system, used for non-residential and ordinary hazard areas, includes enhancements such as extended water supply, increased area of operation, enhanced design density, increased number of sprinkler heads, secondary power supply, etc. – all requirements which were not included in BS 9251:2014 (which was the residential sprinkler standard at the time of BS 9991:2015 and only applied to residential areas)

A Category 4 system in accordance with BS 9251:2021, for non-residential areas, is considered equivalent to a Category OH1 system in accordance with BS EN 12845, up to a maximum compartment size of 100m² (all compartments are less than 100m²)."

- 2.16. This is noted. It will be for the applicant to demonstrate compliance at later regulatory stages.

Hydrants

2.17. The response to the question about the reliance on the use of existing hydrants and whether they are currently usable / operable (fire statement, section 13) is given as “don’t know”. Whilst the response “don’t know” is a valid response on the form, it is not appropriate to this development, which relies on working fire hydrants to feed the proposed fire main. In circumstances such as this, best practice is to check the state of the existing hydrants with the water authority. Without knowing their operability, the proposal might be relying on a disused water main or faulty hydrant.

2.18. It will be for the applicant to demonstrate compliance at later regulatory stages.

Green roofs

2.19. Paragraph 5.11 of the London Plan fire statement states: *“A green roof is to be provided at level 01 and level 10 (roof level) of the building. The green roof installation is to follow the recommendations outlined within the Green Roof Organisation (GRO) Green Roof Code (2021, inc. June 2023 amendments)...”*

2.20. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

Yours sincerely


Stephen Gallagher
Fire Safety Information Assessor

Guidance on Planning Gateway One is available on the Planning Portal: [Planning and fire safety - Planning Portal](#).

This response does not provide advice on any of the following:

matters that are or will be subject to Building Regulations regardless of whether such matters have been provided as part of the application

matters related to planning applications around major hazard sites, licensed explosive sites and pipelines

applications for hazardous substances consent

London Plan policy compliance



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

26 March 2024

For the attention of Mr Samuel James, Senior Planning Officer

Comments re application: 24/00176/FULL; 45 Beech Street

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Dear Mr James,

We are writing on behalf of the Barbican Association, a Recognised Tenants 'Association representing residents of the Barbican Estate, to make the following observations on the above application. Whilst we support the addition of much needed housing in the City, we do have concerns over a number of issues with this application with regard to loss of residential amenity and would request that apposite changes and conditions be attached to any planning consent.

Loss of residential amenity

Roof terraces and balconies

Although not yet formally adopted, we believe that the policies in the emerging Draft City Plan 2040 should now carry considerable weight when assessing planning applications. This is partly because it has been so long in production and the policies on residential protection have been there (unchallenged) since the first iteration but primarily because it has already been formally approved by the Court of Common Council (at its meeting of 8th March 2024). This milestone was reached following the Plan's successful journey through the Planning & Transportation and the Policy & Resource Committees earlier this year.

We would therefore point out that in Policy DE5 of the emerging Draft City Plan 2040: Terraces and Viewing Galleries it 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...***”

Bearing this in mind, it is thus disappointing to note that the applicant describes the location of the proposed external roof terrace as ‘*To the north, the volume steps back to meet Bridgewater House, creating an opportunity for an external amenity terrace. This terrace aims to cultivate a relaxed outdoor environment, promoting health and wellness for all users....*’

This external amenity terrace may well create ‘*a relaxed outdoor environment, promoting health and wellness for all users...*’ but it will also create a space directly overlooking nearby residential premises, Bridgewater House in particular. In terms of the proposed balconies – including the one on level 08 as well as the extended one on level 09 - we would also observe that Shakespeare Tower, Ben Jonson House, the Cobalt Building and Bridgewater House will all be overlooked, resulting in a further loss of privacy.

Overlooking/Loss of daylight and sunlight.

Once again in the emerging Draft City Plan 2040, it states in Policy HS3: Residential Environment 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.....***”

The application states that it ‘*proposes to retain and refurbish the majority of the existing building..*’. Whilst ‘*the top two floors are not suitable for retention given the low floor to ceiling heights and general incompatibility for the proposed use. They are proposed to be removed and replaced with four new floors of new built form....The existing building (which peaks at 8 storeys and 42.36m AOD) will have a net increase in height of two floors – with a final finished maximum height of 50m AOD...*’

This is an increase in height of 7.64m – or 18% compared to the existing building.....

The Planning and Design & Access Statements also state that ‘*It is proposed to demolish 957.1sqm (GIA) and add a total of 2,641.2sqm (GIA) of new floorspace. This would equate to a 1,684.2sqm increase in floorspace and result in a final building comprising 6,968.2sqm (GIA) of co-living floorspace...*’

....and represents a 32% increase in floorspace.

Whilst we fully appreciate that the applicant would want to maximise the space available, the proposed increases in height and mass does seem somewhat excessive and evoke concerns over such issues as overlooking and loss of daylight and sunlight. The submitted Daylight and Sunlight analyses make reference to these concerns but provide no solutions, particularly to residents in Bridgewater Square. Whilst it is stated that ‘*where windows and rooms have been identified to fall short of the guidelines, these are mainly isolated to the neighbouring*

property at 6-9 Bridgwater Square which contains windows and rooms on its south elevation which face directly into the courtyard and therefore onto the development site”.....this provides scant consolation to the residents affected.

As for the proposal’s impact on the Barbican Estate, it states that ‘consideration has been given to the proximity of the South facade to the edge of the Barbican podium, especially in relation to privacy and overlooking risks to the south facing first floor rooms. The internal layout of these rooms differs from the typical room layout to allow kitchen and living area located closer to the facade and bed/rest area of a more discreet nature, further pushed in the room to increase privacy and avoiding a direct overlooking.....’

This would appear to confirm that residential amenity will be lost by the proposed increase in height and mass given that the consequent loss of both daylight and sunlight will affect not only Bridgewater House but also Bryer Court, Breton House, Ben Jonson House, Tudor Rose Court and Clarendon Court. These blocks, together with Shakespeare Tower, will also be overlooked resulting in loss of privacy and further diminution of residential amenity.

Proposed use of terrace

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... ”.***

Bearing this policy in mind, we were therefore again disappointed to note the proposed scale and use of the external spaces in this application. Indeed, in both the Design & Access and Sustainable Design & Construction Statements the proposed communal outdoor terrace is described as follows:

‘A communal terrace is carefully incorporated to offer elevated social spaces. The design includes stepped seating arrangements that create a theatrelike atmosphere, providing an ideal setting for various activities such as film screenings or events with the use of a screen or projector. The expansive space allows for versatile seating arrangements, enabling the easy movement of tables and chairs to adapt to different needs....’

The prospect of ‘film screenings’ and ‘events’ held on an expansive communal terrace in such a densely populated residential area is likely to create significant noise pollution. This is not only unacceptable but is also in clear contravention of the policies within the Draft City Plan 2040 and will cause significant harm to residential amenity.

Should this application be consented, we would therefore request that restrictions on the timing and uses of the communal external spaces be applied in in order to protect the amenity of the many residential premises in the near vicinity.

Summary

In summary, whilst we support the change of use from office to residential in theory, in practice we have concerns over both the increased height and mass of the proposals and the prospective use of the communal external spaces given their significant impact on residential amenity in a Grade II and Grade II* listed environment located in an important and historic Conservation Area.

For all of the reasons discussed in this letter, we put forward our concerns regarding this application in its current form. We therefore request both a reduction in the proposed development's height and mass and the application of conditions regarding the timing and use of the external communal spaces in order to protect residential amenity.

Yours sincerely,

Jane Smith – Chair, Barbican Association Planning Sub-Committee

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

London 02 April 2024

Barbican and Golden Neighbourhood Forum

Dear Samuel James,

Reference: 24/00176/FULL

Address: 45 Beech Street London EC2Y 8AD

Proposal: Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing, and all other associated works.

While we support the principle of the conversion of the office block to a co-living scheme, we have the following concerns regarding aspects of the proposed development and the information submitted in support of the scheme.

We therefore **OBJEC T** to the application on the following grounds:

The loss of day and sunlight due to too much height at the northern end of the redevelopment.

The size/scale of the barrel vault roofs which are disproportionate and over-dominant in the context of the Barbican's listed status.

The lack of external amenity and the potential for excessive noise pollution from the roof terrace.

Occupancy and minimum term.

Occupancy

At a meeting of the developer with Barbican residents on 15th September 2023, the team stated that the upper floors would feature 174 individual studio apartments with an average size of 23-24m² per unit (smallest 21m², largest 32m²), single occupancy, no pets allowed. Behind the reception the ground floor and the full basement would offer shared spaces for residents (approximately 4-5m²/person): communal cooking facilities, dining area, living area, and co-workspace.

The London Plan sets out in Chapter 4 Housing, under 4.16.1 "*Large-scale shared living developments may provide a housing option for **single person households** who cannot or choose not to live in self-contained homes or HMOs. This policy is required to ensure that new purpose-built shared living developments are of acceptable quality, well-managed and integrated into their surroundings.*"

Although the Planning Statement submitted with the application mentions the London Plan Policy H16, the single occupancy (and no pet rule) has been omitted from the application's Draft Co-Living Operational Management Plan. The amount of communal space is calculated on 174 of single occupants and rooms are laid out for one resident per studio.

In our view, single occupancy in compliance with the London Plan should be secured by way of condition.

Minimum Term

At the pre-applications discussions the developer stated that the average stay would be approximately 1 year and agreed that the lease will prohibit short lets, sub-lets and Airbnb.

The London Plan sets out:

*In Policy H16 for 'Large-scale purpose-built shared living' requires under " 5) its units are all for rent with minimum tenancy lengths of **no less than three months**; 6) communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least: convenient access to a communal kitchen, outside communal amenity space (roof terrace and/or garden) (..)"*

*Under point 4.16.3 "(..) **Tenancies** should be for a minimum of three months to ensure large-scale purpose-built shared living developments do not effectively operate as a hostel."*

Under point 4.16.4 "(..) The agreed management plan should be secured through a Section 106 agreement (..)"

However, the submitted Draft Management Plan states under 4.2 4.3 "(..) All residents will be on tenancy agreements with a minimum term of 1 month, most agreements will typically be on a 12 month term."

The minimum term of 1 month is contrary to the London Plan, which requires a minimum term of 3: 1) To ensure that the proposed development will make a meaningful contributing to meeting London's and the City's housing targets and; 2) to prevent the scheme from operating as a hostel.

Compliance with the plan's minimum term of 3 months, as stated in the Planning Statement, should be included in the Management Plan and secured through the section 106 agreement.

External Amenity Space

The Planning Statement writes under 6.32 "External amenity space is proposed in the form of a roof terrace and courtyard measuring providing a total of 200sqm of space. This equates to 1.1sqm of space per resident and sufficiently balances the wider operational requirements of the building with the need to minimise demolition within this built-up context."

It is considered that the scheme does not provide sufficient external amenity for 174 residents and their guests. 1) The ramp, which slopes from ground to lower ground floor level will be used for servicing the co-living block and, exacerbated by the lack of light and sunlight of the 9-storey deep courtyard, will not offer quality external amenity space. 2) The amount and size of the external amenity spaces are neither noted on plans nor quoted in the Design and Access or Planning Statements. With approximately

50m², which equates to less than 03.m² per resident, the roof terrace will not be sufficient, leading to intensive usage which will also raise the risk of noise and light pollution for neighbours.

As only quality external amenity space the intensive use will have adverse effect on all surrounding flats of Ben Jonson House, Bryer Court, Cobalt Building, Bridgewater House. It appears from the submitted application documents that there would be an unacceptable impact of 9th floor roof terrace, due to noise pollution and direct overlooking, specifically of Ben Jonson House and Bridgewater House.

We would request that an adequate amount and quality of external amenity is provided within the scheme, based on full occupancy of the 174-bedroom co-living scheme. Instead of one large roof terrace, it may be more successful to offer a number of smaller terraces that fit in with the general character of the residential area.

Due to the sensitive location of the external amenity at roof level, in immediate adjacency to residential Ben Jonson House, Bryer Court, Cobalt Building, Bridgewater House, we further request that by way of condition the number of people using the terrace at any one time shall be limited. The hours of use should be restricted as to prevent the disturbance of the residential peace, and a suitable management plan to ensure compliance should be secured by conditions.

Day and sunlight

Along the east elevation the building height will increase from 39.7m AOD to 50.0m and approximately 48.0m for the last two barrel-vaults. The increase in height will have a significant impact on the day and sunlight received by residential properties in Bridgewater House. For the western end of Ben Jonson House, this increase of height will lead to the loss of late afternoon sunlight to north facing dining and bedrooms.

Scale and grain

The architects have employed the barrel-vaulted roof motif of the Barbican Estate. Irrespective of the argument whether this may be appropriate, the borrowed barrel-vaults should be subservient and no larger than the precedent, especially as the proposed development sits proud of the prevailing building line of Ben Jonson House and Bryer Court.

The proposed south elevation features four consecutive segmented arches, each spanning more than 5 metres. The resultant roofscape appears overly dominant, disproportionate, and out of character in comparison to the adjacent barrel-vaulted roofs of Ben Jonson House, which span the distance of only 3.3 metres. The *South Elevation – Proposed*, as shown on Drawing PL-220, should be redesigned so that the proposed building remains subservient and in keeping with the scale and grain of its immediate neighbours, Bryer Court and Ben Jonson House, to protect the setting of these buildings and the Barbican and the Golden Lane Conservation Area from harm.

END OF OBJECTION

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

Address: 45 Beech Street London EC2Y 8AD

Application Reference: 24/00176/FULL

Case Officer: Samuel James

Description: Extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (*sui generis*) including cycle storage, landscaping, servicing and all other associated works.

CIL and Planning Obligations

1. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
2. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
3. On the 1st of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).
4. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£134,736.00	£129,346.56	£5,389.44

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£126,315.00	£119,999.25	£6,315.75
City Planning Obligations			
Affordable Housing	TBC	TBC	TBC

Local, Training, Skills and Job Brokerage	£50,526.00	£50,021.00	£505.00
Carbon Reduction Shortfall <i>(as designed)</i> <i>Not indexed</i>	£125,918.00	£125,918.00	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	TBC	TBC	TBC
S106 Monitoring Charge	£4,347.00	£0	£4,347.00
Total liability in accordance with the City of London's policies	TBC	TBC	TBC

City's Planning Obligations

5. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.
- Highway Reparation and other Highways Obligations
(Highways Schedule of Condition Survey, site access, consents, licences etc)
 - Local Procurement Strategy
 - Local Training Skills and Job Brokerage Strategy *(Construction)*
 - Delivery and Servicing Management Plan *(including Consolidation)*
 - Travel Plan *(including Cycling Promotion Plan)*
 - Construction Monitoring Cost *(£30,935 for first Year of development and £25,760 for subsequent years)*
 - Carbon Offsetting
 - 'Be Seen' Energy Performance Monitoring
 - Section 278 Agreement *(CoL)*
 - Public Realm Space *(Public Access & Management Plan)*
 - Co-Living *(Management Plan)*
 - Viability Review

6. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.
7. The scope of the s278 agreement may include, but is not limited to (TBC)

Monitoring and Administrative Costs

8. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.
9. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.



Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

Telephone

Email

Date 11th April 2024

Our Ref DS/SUDS24/0016

Your Ref PT_SJ/24/00176/FULL

Subject 45 Beech Street London EC2Y 8AD

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 undertaken a review of the information provided in the above application and does not consider the proposed scheme to satisfy the requirements of the local planning policy in regard to flooding and sustainable drainage, the LLFA therefore recommends that the application be rejected. This is for the following reasons:

- The proposed scheme does not sufficiently control the surface water discharge rate in line with the London Plan and its supplementary planning guidance.
- The proposed scheme has not sufficiently demonstrated that the London Plan Drainage Hierarchy was followed during the design in line with the local plan.

Whilst we recognise that the nature of this application does constrain options for SUDs, we would expect a 50% betterment on the existing rates to be a last resort. Therefore, the applicant should demonstrate an assessment of all the preferred options and their associated attenuation amounts (e.g. greenfield rate, <5 l/s) with clear justifications as to why these or not achievable before proposing a 50% betterment.

If you are aware of any aspect of the proposal that I may have missed that you would like me to have a look at please feel free to contact me.



Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

Te le p h o n e [REDACTED]

Email [REDACTED]

Date 30th May 2024

Our Ref DS/SUDS24/0016

Your Ref PT_SJ24/00176/FULL

Subject 45 Beech Street London EC2Y 8AD

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 information provided 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 and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 7.6 l/s, provision should be made for an attenuation volume capable of achieving this, which should be no less than 30 m³;
- (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.

Memo

To Assistant Director (Development Management)
Environment Department

Email [REDACTED]



From Paul Bentley
Air Quality Officer

Telephone [REDACTED]

Email [REDACTED]

Date: 14/08/24

Your Ref: 24/00176/FULL

Subject: 45 Beech Street, London, EC2Y 8AD

Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

The proposed development will be car free as defined within Air Quality Neutral guidance, and the development is to be connected to the CitiGen district heat network which reduces the need for on-site combustion plant. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment. Plans have been submitted showing the location of the generator flue (PL222), this is 1m above the roof level and not located close to any air intakes.

Should the development be approved please attach the following conditions:

Condition M28C amended

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 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 \(www.gov.uk\)](http://www.gov.uk)

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: [REDACTED]



From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection
Telephone [REDACTED]
Email [REDACTED]

Date 21 August 2024
Our Ref 24/01341/NPLN
Your Ref 24/00176/FULL

Subject 45 Beech Street London EC2Y 8AD

Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Thank you for your memorandum. I have reviewed the application and I recommend that the following conditions be attached to any consent :

No live or recorded music shall be played at such a level that it can be heard outside the premises or within any residential or other premises in the building.

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.

No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3

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

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

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

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

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.

All residential premises in the development shall be designed and constructed to attain the following internal noise levels:

Bedrooms- 30dB L_{Aeq, T^*} and 45dB L_{Amax}

Living rooms- 30dB L_{Aeq, T^*}

*T- Night-time 8 hours between 23:00-07:00 and daytime 16 hours between 07:00-23:00.

A test shall be carried out after completion but prior to occupation to show that the criteria above have been met and the results must be submitted to and approved in writing by the Local Planning Authority prior to occupation of any part of the building.

REASON: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3 and D21.5.

Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used so that the noise level in the bedrooms does not exceed NR30 attributable to the non-residential uses of the ground floor and/or basement levels. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter.

REASON: To protect the amenities of residential occupiers in the building in accordance with the following policies of the Local Plan: DM21.3, DM21.5.

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 commercial or communal kitchen use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class A use takes place.

REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

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.

Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to

air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.

REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.

All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

The roof terraces on level 9 hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 08:00 on the following day, other than in the case of emergency.

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

No amplified or other music shall be played on the 9th floor terrace or other external amenity space.

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.

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

- lighting layout/s;
- details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure);
- a lighting control methodology;

- proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies;

- all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass; - details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering.

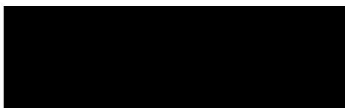
- All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the Lighting SPD and the following policies of the Local Plan: DM10.1, 15.7 , CS15, emerging policies DE1, DE2 and HL3 of the Draft City Plan 2036 and the City of London Lighting SPD 2023.

Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.

REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DMI0.1

Regards



Donal Rooney

Environmental Health Officer

Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,
Guildhall, London, EC2P 2EJ

Mob: 



70 Cowcross Street
London EC1M 6EJ

Telephone: [REDACTED]

Email: [REDACTED]

www.thegardenstrust.org

Emailed to Samuel James

[REDACTED]
City of London Corporation

22nd August 2024

Dear Mr James,

Re: 24/00176/FULL | Partial demolition, extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.

Thank you for consulting the Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site included by Historic England (HE) on their Register of Parks and Gardens of Special Historic Interest in England, as per the above application.

We are grateful for the opportunity to comment on this application, which has a material impact on the significance of The Barbican, an historic designed landscape comprising public, communal and domestic gardens and open spaces, laid out 1962-82, forming an integral part of a housing estate designed by Chamberlin Powell and Bon, with Ove Arup and Partners, Registered by Historic England at Grade II*. The inclusion of this site on this statutory register requires great weight to be given to its conservation.

We write to advise you that we have some concerns about the effect of the height and massing of the proposed development on the significance of The Barbican RPG.

The existing building at 45 Beech Street is considerably lower than, and out of kilter with, the surrounding buildings, so we appreciate that the proposed development, being sympathetic in architecture, massing and style to those buildings next to it, might be an improvement to the setting of the RPG in this area. We are concerned, however, about the proposed height. In order to conserve the significance of the RPG and its setting, new buildings adjacent to the RPG must be lower than the existing, Listed buildings that contribute to the RPG's significance. The existing buildings also have a strong horizontality which the new one lacks, even if it does incorporate the arched details seen across the site. An overly tall building will also cause adjacent gardens to lose sunlight: Beech Gardens may be affected in the early morning and Bridgewater Street in the afternoon.

We have noted that the Heritage, Townscape & Visual Impact Assessment provided lacks thorough investigation into the visual impact of the development on the gardens and open spaces within the RPG. Specifically:

- analysis of any views from the open space at the west end of the Barbican Art Gallery.
- analysis of views further east of views 1-4

- The Golden Lane Estate Grade II RPG south side, Barbican Wildlife Gardens and Fann St within the immediate setting of the RPG may have views in winter of the new building and have not been investigated

There is a delicate balance between built form and the gardens at the moment which could be easily eroded by allowing expansion upwards above the adjacent Ben Johnson House, even by a small amount. We would ask, therefore, that the new building be lower than Ben Johnson House. In addition, the open space of the RPG has to serve a wide community as well as residents. The introduction of so many additional dwellings will add to the pressure on the gardens as the new, small roof garden is not going to make much of a contribution to local open space. The RPG may therefore suffer.

The following paragraphs of the National Planning Policy Framework support our observations:

Paragraph 205. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be).

This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Paragraph 206 states that: Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

In this instance, we would assess the level of harm to the RPG as a whole to be less than substantial.

We would be grateful to be reconsulted, should further information or amendments regarding these issues be submitted, and would be grateful to be advised of the outcome of the application in due course.

Yours sincerely,

Tamsin McMillan

Volunteer Support Officer and Acting Conservation Officer
The Gardens Trust

For further information, we refer you to the Gardens Trust publication The Planning System in England and the Protection of Historic Parks and Gardens (2024), which is available online at <https://thegardenstrust.org/wp-content/uploads/2016/10/Planning-System-in-England-and-Protection-of-Historic-Parks-and-Gardens-2016-v1.pdf>

From: Donal Rooney [REDACTED]
Sent: 29 August 2024 12:39
To: James, Samuel [REDACTED]
Subject: RE: 24/01341/NPLN . 45 Beech Street

Hi Sam
I would not have a problem with 7am as it is a residential usage.
Regards
Donal

From: James, Samuel [REDACTED]
Sent: Thursday, August 29, 2024 12:37 PM
To: Donal Rooney [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street
Importance: High

Hi Donal,

You can ignore the questions in my email from yesterday below, I think I've answered them myself.

However, I had one final question on this, if you could answer today would be most appreciated, as my report is due tomorrow morning.

The applicant wants to have the roof terrace and courtyard external amenity areas open at 7am instead of 8am (as per your recommended condition), as it is a residential use - would this be acceptable, or do we have to stick with 8am as the earliest time for these spaces to be open to residents?

Many thanks,



Samuel James
Planning Officer (Development Management)
City of London | Environment Department | Guildhall | London | EC2V 7HH
Telephone Number: [REDACTED]
www.cityoflondon.gov.uk

From: James, Samuel [REDACTED]
Sent: 28 August 2024 12:43
To: Donal Rooney [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street

Hi Donal,

I hope you are well, and thanks again for the amended conditions you sent last week.

I've had a couple of queries from the applicant RE: your suggested conditions, please see the table below (column 1 is your condition wording, column 2 and 3 are the applicant's comments).

For the fume extract details, presumably we still need this as they have a communal kitchen for the co-living residents, and furthermore a public cafe is proposed where there could be a communal kitchen, so I'd say we need to keep this condition, do you agree?

For the air quality report, can you confirm if it is definitely required in this case please?

They have also asked for clarity over the lighting strategy condition - does this relate to both internal and external lighting?

Fume extraction details 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 commercial or communal kitchen use. Flues must terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class E 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.	Condition to be deleted.	This condition should be deleted as it is not applicable given there is no commercial kitchen or any kitchen flues.
Plant air quality report Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local	Condition to be deleted.	The scheme does not include any plant machinery (except

Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.

REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.

for the emergency generator flue, which our air quality consultants have confirmed do not raise any air quality issues)

Many thanks,



Samuel James

Planning Officer (Development Management)

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

Telephone Number: [REDACTED]

www.cityoflondon.gov.uk

From: Donal Rooney <[REDACTED]>
Sent: 21 August 2024 12:51
To: James, Samuel <[REDACTED]>
Subject: RE: 24/01341/NPLN . 45 Beech Street

Hi Sam,
Revised response attached.
Regards
Donal

From: James, Samuel <[REDACTED]>
Sent: Monday, August 19, 2024 8:00 AM
To: Donal Rooney <[REDACTED]>
Subject: Re: 24/01341/NPLN . 45 Beech Street

Hi Donal,

I hope you had a nice weekend.

This one needs to go to committee, so would you be able to amend your comments to reflect the below please, as this issue is likely to come up?

Many thanks,



Samuel James

Planning Officer (Development Management)

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

Telephone Number: [REDACTED]

www.cityoflondon.gov.uk

From: James, Samuel <[REDACTED]>
Sent: 14 August 2024 12:31
To: Donal Rooney <[REDACTED]>
Subject: Re: 24/01341/NPLN . 45 Beech Street

Thanks Donal,

If the courtyard us to be included, but they are able to use the spaces at weekends, are you able to amend your comments to reflect this please?

I also had a couple of objections relating to noise from the proposed private balconies (there are 5 at 8th floor level). Presumably we don't need to (nor would we be able to) control the hours of use of these private balconies?

Many thanks,



Samuel James

Planning Officer (Development Management)

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

Telephone Number: [REDACTED]

www.cityoflondon.gov.uk

From: Donal Rooney <[REDACTED]>

Sent: 14 August 2024 12:17
To: James, Samuel [REDACTED]
Subject: RE: 24/01341/NPLN . 45 Beech Street

Hi Sam
Yes the courtyard needs to be included but I don't have a problem with weekend usage.
Regards
Donal

From: James, Samuel [REDACTED]
Sent: Wednesday, August 14, 2024 12:05 PM
To: Donal Rooney [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street

Thanks Donal - that's helpful.

Does the courtyard at ground level also need to be restricted to the same hours? Furthermore, do we need to say no weekend of the terrace at all, considering the residential nature of the use?

Many thanks,



Samuel James
Planning Officer (Development Management)
City of London | Environment Department | Guildhall | London | EC2V 7HH
Telephone Number: [REDACTED]
www.cityoflondon.gov.uk

From: Donal Rooney [REDACTED]
Sent: 14 August 2024 11:32
To: James, Samuel [REDACTED]
Subject: RE: 24/01341/NPLN . 45 Beech Street

Hi Sam,
Given that there is a restriction on music being played on the patio and the relatively small area involved I think that peoples voices during the recommended hours would be unlikely to have any significant noise impact on the surrounding area.
Regards
Donal

From: James, Samuel [REDACTED]
Sent: Wednesday, August 14, 2024 11:19 AM
To: Donal Rooney [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street

Hi Donal,

I am currently writing this one up for committee - your comments attached.

We've had quite a few objections from surrounding neighbours regarding noise from the proposed amenity spaces: level 9 roof terrace, external (enclosed) ground floor courtyard and private balconies.

I note that you've recommended a condition relating to this: *The roof terraces on level 9 hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 08:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.* Also for no music on the terraces.

As this is for a kind of housing, no use of the terrace at all at weekends could be an issue, but I understand if that condition needs to be there to protect surrounding residential amenity.

I also had a question as to whether you think the 8am-10pm use of the terrace seems acceptable, considering quite a few adjoining residents have objected to the terraces, use until 10pm every night could possible result in complaints - what do you think?

Happy to discuss.

Many thanks,

Sam



Samuel James
Planning Officer (Development Management)
City of London | Environment Department | Guildhall | London | EC2V 7HH
Telephone Number: [REDACTED]
www.cityoflondon.gov.uk

From: Donal Rooney [REDACTED]
Sent: 10 April 2024 10:06

To: James, Samuel [REDACTED]
Subject: RE: 24/01341/NPLN . 45 Beech Street

Hi Sam,
Sorry about that. The correct response is now attached.
Regards
Donal

From: James, Samuel [REDACTED]
Sent: Monday, April 8, 2024 8:59 AM
To: Donal Rooney [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street

Hi Donal,

Apologies, I missed this on Friday, but the attached is for City of London Boys School - do you have the comments for Beech Street?

Many thanks,

Sam James - Planning Officer (Development Management)
Environment Department



Environment Department
City of London Corporation
London EC2P 2EJ

www.cityoflondon.gov.uk

From: Donal Rooney [REDACTED]
Sent: 05 April 2024 14:40
To: James, Samuel [REDACTED]; Whitehouse, Robin [REDACTED]
Cc: Smith, Alexander [REDACTED]
Subject: RE: 24/01341/NPLN . 45 Beech Street

Hi Sam,
Revised response attached.
Regards
Donal

From: James, Samuel [REDACTED]
Sent: Friday, April 5, 2024 2:17 PM
To: Donal Rooney [REDACTED]; Whitehouse, Robin [REDACTED]
Cc: Smith, Alexander [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street

Hi Donal,

Thanks for coming back to me - Are you able to update your attached Memo with the additional comments please for the record, and so we can upload to public access?

Many thanks,

Sam James - Planning Officer (Development Management)
Environment Department



Environment Department
City of London Corporation
London EC2P 2EJ

www.cityoflondon.gov.uk

From: Donal Rooney [REDACTED]
Sent: 05 April 2024 13:12
To: James, Samuel [REDACTED]; Whitehouse, Robin [REDACTED]
Cc: Smith, Alexander [REDACTED]
Subject: RE: 24/01341/NPLN . 45 Beech Street

Hi Sam,

Can you add these conditions :

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

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

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

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the Lighting SPD and the following policies of the Local Plan: DM10.1, 15.7, CS15, emerging policies DE1, DE2 and HL3 of the Draft City Plan 2036 and the City of London Lighting SPD 2023.

Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.

REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1

Regards
Donal

From: James, Samuel [REDACTED]
Sent: Friday, April 5, 2024 11:48 AM
To: Whitehouse, Robin [REDACTED]; Donal Rooney [REDACTED]
Cc: Smith, Alexander [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street

Hi Robin and Donal,

Are the attached comments correct or did you need to amend anything?

Many thanks,

Sam James - Planning Officer (Development Management)
Environment Department



From: James, Samuel [REDACTED]
Sent: 19 March 2024 14:49
To: Whitehouse, Robin [REDACTED]; Smith, Alexander [REDACTED]
Subject: Re: 24/01341/NPLN . 45 Beech Street

Hi Robin, attached.

Apologies for the format but I had to take screenshots from IDOX as I couldn't find the original email.

Kind regards,

Sam James - Planning Officer (Development Management)
Environment Department



Environment Department
City of London Corporation
London EC2P 2EJ

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From: Whitehouse, Robin [REDACTED]
Sent: 19 March 2024 14:23
To: James, Samuel [REDACTED]
Subject: 24/01341/NPLN . 45 Beech Street

Hi Samuel,

My apologies if my team have contacted you already, Donal Rooney has commented on the application above (45 Beech Street) he is not in until Thursday and my manager needs to view the conditions suggested.

Kind regards



Robin Whitehouse | Pollution Control Team Manager

Telephone: [REDACTED] Mb [REDACTED]

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Bob Roberts

Interim Executive Director Environment

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