Committee:	**Date:**
Planning Applications Sub Committee	10th September 2024
Subject: 45 Beech Street 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.	**Public**
Ward: Aldersgate	**For Decision**
Registered No: 24/00176/FULL	**Registered on:** 19 February 2024
Conservation Area: No	**Listed Building:** No

Summary

Existing Site

The property address is 45 Beech Street, and it is known as Murray House. It is a corner property and also fronts Bridgewater Street. It is in existing use as an office (Class E).

The building is joined to Bridgewater House (on Bridgewater Street) to the north which is a residential property. To the west is Bryer Court which is also residential. The three buildings enclose a courtyard area and ramped access which leads from Bridgewater Street into the basement of the Site.

The site is not a listed building, and is not in a conservation area, however it is immediately adjacent to The Barbican Estate (GII Listed), Barbican Registered Historic Park and Garden (Grade II*), and the Barbican and Golden Lane Conservation Area.

Proposal

Planning permission is sought for the partial demolition, extension and change of use of the existing office building (Class E) to co-living accommodation (Sui Generis)- in the form of 174 private units with associated internal and external amenity spaces including communal cooking, dining and working areas, cycle storage, landscaping, servicing and other associated works.

It is proposed to demolish the top two existing stories, and plant above - equating to 957sqm (GIA). It is proposed to build four new stories equating to a total of 2,641sqm (GIA) of new floorspace. This would equate to a 1,684sqm net increase in floorspace and result in a final building comprising 6,968sqm (GIA) of co-living floorspace (Sui Generis).

Consultations

66 public Objections have been received, and these relate to issues including concerns over loss of residential amenity including: Noise and disturbance and loss of privacy resulting from external spaces, roof terrace and balconies; increased height and massing would result in overlooking and loss of daylight and sunlight.

Concerns have also been raised to the design of the proposal, in terms of its scale, and detail of the barrel vaulted roofs.

Impact to the local highway network, with regard to deliveries and residents moving in/out of the proposed development has also been raised.

Assessment Summary

Principle of Development

The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the National Planning Policy Framework, and the emerging Local Plan and considering all other material considerations.

Considering the location, the loss of this office use (Class E) is not considered to prejudice the primary business function of the City, nor would it jeopardise the future assembly and delivery of large office development sites; or introduce uses that adversely affect the existing beneficial mix of commercial uses. It has been demonstrated through viability testing and marketing that the continued use of the building as an office is not viable, and therefore the proposed change of use is acceptable in principle, in line with Policy DM1.1.

As this is a residential location, the site is suitable for the proposed co-living use (Sui Generis) in principle, in line with Policy DM21.1. The scheme has been through affordable housing viability testing in line with London Plan Policy H5 and H16, to determine the appropriate financial sum to be provided in lieu of affordable housing on site, and £8,510,568 would be secured towards off-site affordable housing if planning permission is granted. This element of the application has been subject to third party review by a financial viability consultant.

Despite some shortfalls in the provision of daylight and sunlight to the proposed scheme compared to the BRE guidance, officers consider the proposed quality of private accommodation and communal co-living facilities to be acceptable, they would provide future residents with acceptable facilities for sleeping, eating, working, relaxing and storage, in line with Policy DM21.5 of the Local Plan, HS4 of the Draft City Plan

2024, Policy H16 of the London Plan and the Large Scale Purpose Built Shared Living (LSPBSL) London Plan Guidance.

Sustainability

The proposed development would deliver a high quality, energy efficient development that is on track to achieve an "Excellent" BREEAM assessment rating, in overall compliance with London Plan policy SI 2, Local Plan policy CS15 and DM 15.5 as well as Draft City Plan 2040 policy DE1. The scheme demonstrates the implementation of various measures to reduce operational energy demand and benefits from future capacity to connect to a nearby district heating network upon completion.

The assessment of options, carried out in compliance with the Carbon Options Guidance 2023, confirmed that although the preferred proposal would result in the highest whole life-cycle carbon emissions out of the 2 options, none of the other options would be able to deliver the holistic sustainability benefits that would complement the re-development of the site into a scheme according with the residential context of the immediate surrounding area. Opportunities to maximise the reuse of deconstruction materials from the site have been identified to mitigate impacts of redevelopment. The proposal therefore would satisfy the GLA's circular economy principles and London Plan policy SI 7, Local Plan policy CS15 and DM17.2, and Draft City Plan 2040 policy CE1. The building design responds well to climate change resilience by implementing natural ventilation to respond to overheating risks, saving water resources and various opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and Draft City Plan 2040 polices S14, OS1, OS2, OS3, S15, CR1, CR3.

Urban Design and Heritage:

Officers consider that the architectural design of the building would be compatible with the existing context in terms of scale and massing and be read as a well-layered piece of design, which would improve the building's contribution to the local townscape.

Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate co-living housing, which would increase housing stock and housing choice for Londoners. The proposals align with the function of the City to accommodate substantial growth in accordance with Local Plan Policies CS21: Housing, emerging City Plan 2040 Policy S3 Housing, and London Plan Policies D3 Optimising Site Capacity, D4 Delivering Good Design and H16 Large Scale Purpose Built Shared Living.

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

The proposal has been considered in relation to the LVMF and other Strategic Views (including the World Heritage Site). The proposal's small scale, dense urban location and distance from the WHS means that it would not appear in any of these views and therefore the relevant policies in the London and Local Plans would not be triggered.

The proposals would preserve the significance (via change in the setting) of heritage assets and any changes to the settings would not impact on the appreciation of nearby heritage assets. As such, the proposal would accord with Local Plan policies CS12 and DM12.1, emerging City Plan 2040 policies S11 and HE1, London Plan policy HC1, having accounted for and paying special regard to s.66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant NPPF policies.

Neighbouring Amenity Impacts

The proposed development has been identified as having some minor and major adverse impacts upon daylight and sunlight to surrounding residential properties, however considering the majority of adversely impacted windows are bedrooms, the existing poor daylighting factors, and the fact this is a tight knit urban environment, officers have assessed the impacts to be acceptable.

Objections relating to noise and disturbance have been considered, these would be addressed through conditions including restricting the hours of use of the proposed external amenity areas, and requiring there be no music to be heard from outside the premises, as well as with an Operational Management Plan. Officers consider the amenity impacts to be acceptable when considered on balance with the other merits of the application, in line with Policy DM21.3 of the Local Plan and HS3 of the Draft Local Plan 2024. A full list of conditions is set out in Schedule 1.

Transport and Highways

The proposed development would result in less highway activity than the existing office use. This is subject to compliance with conditions and planning obligations which are recommended, including submission of a Demolition/Construction Logistic Plan (DCLP), delivery and servicing plan and a Parking Design and Management Plan. A travel plan is recommended to be secured by Section 106 agreement. A section 278 agreement is recommended to secure the cost of public highway and public realm improvement works in the general vicinity of the site, as well as any remedial works.

A policy compliant level of cycle parking: 134 Long stay, and 12 short stay spaces, are proposed and would be secured by condition, in line with Policy T5 of the London Plan. Furthermore, officers have negotiated the provision of a single accessible parking space within the site. Other than the accessible space, the proposed development would be car-free in line with Policy T6.1 of the London Plan.

The proposal is considered acceptable in transport terms, in line with Policy DM16.1 of the Local Plan and VT1 of the Draft City Plan 2040, subject to compliance with the recommended conditions and planning obligations.

As discussed in detail and assessed in full in the following report, it is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

Recommendation

(1) That subject to the execution of the planning obligations in respect of the matters set out under the heading ‘Planning Obligations’, and the recommended conditions of development, the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule; and:

(2) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 of the Town and Country Planning Act 1990

Photographs

Image 1: View of property from Barbican Podium, to the Southeast of the site

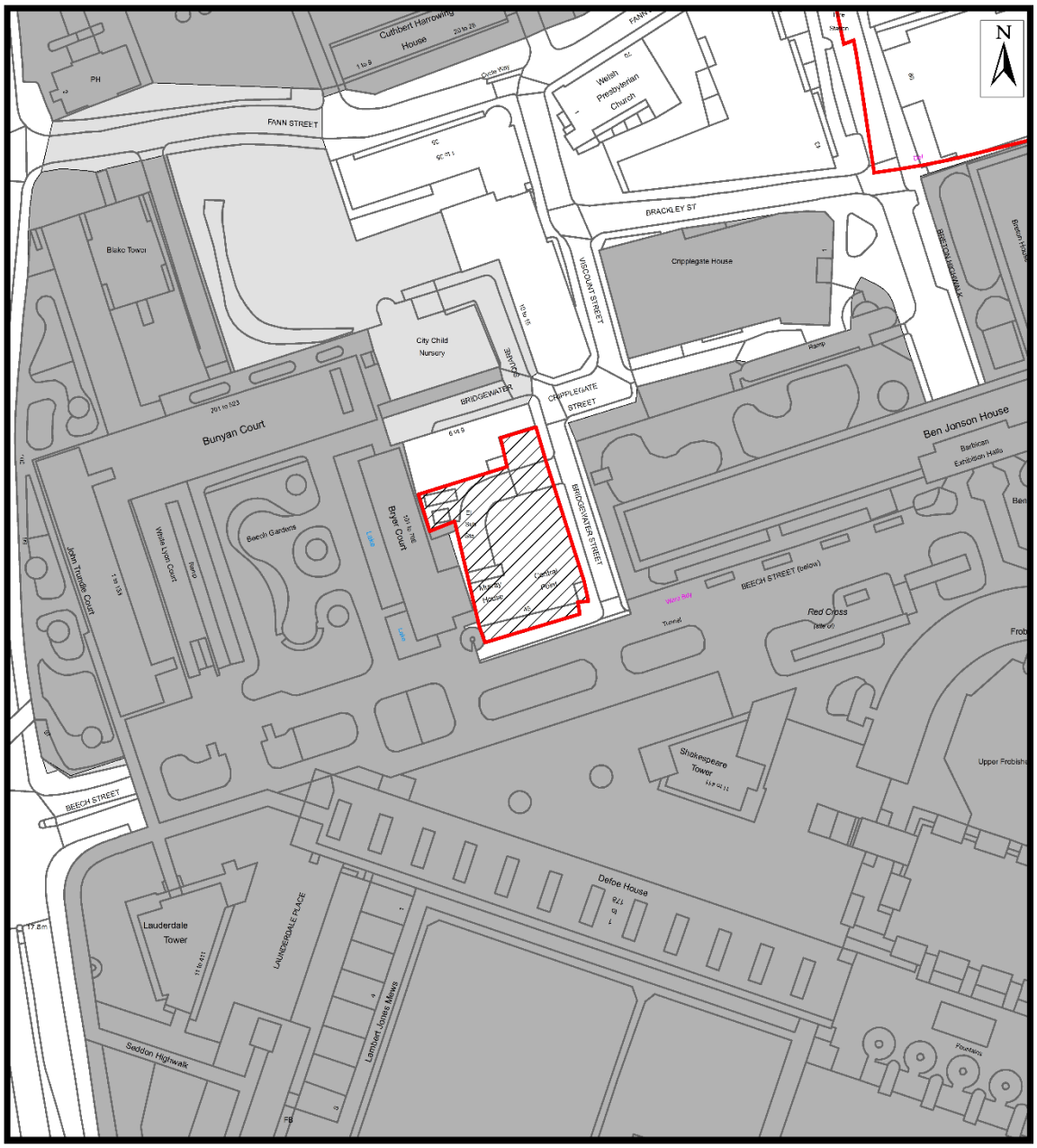
Image 2: View of front elevation taken from Beech Street tunnel.

Image 3: View of Bridgewater Street elevation

Image 4: View of westerly facing internal courtyard elevation

Image 5: View of property from Barbican Podium from the Southwest of the site.

Site Location Plan



ADDRESS:
45 Beech Street

CASE No.
24/00176/FULL

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

ENVIRONMENT DEPARTMENT

APPLICATION COVER SHEET

45 Beech Street

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	42.36m (AOD)		50m (AOD)	
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Office	5,284	Office	0 sqm
	Co-Living	0 sqm	Co-Living	6,968.2
	TOTAL	5,284	TOTAL	6,968.2
			TOTAL UPLIFT:	1,684.2 sqm
3. OFFICE PROVISION IN THE CAZ	N/A			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	N/A		Estimated 14 Full Time Employees	
5. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	7	Car parking spaces	1
	Cycle long stay	25	Cycle long stay	134
	Cycle short stay		Cycle short stay	12
	Lockers	N/A	Lockers	0
	Showers	N/A	Showers	0
	Changing facilities	N/A	Changing facilities	0
6. HIGHWAY LOSS / GAIN	None			

7. PUBLIC REALM	The proposed entrance for the Beech Street development presents an opportunity to enhance the overall public space by incorporating additional seating, increasing greenery, and by providing a pleasant buffer zone between the road and the building. Surrounded by a stone 'mat,' the building establishes a clear boundary, offering a distinct transition as one approaches from the road and surrounding area, into a high quality public realm. Re-purposing existing stone from the current development, the proposal seeks to expand the current planters at the base of columns to provide ample space for eye-catching and large plant species to thrive, while also accommodating a more spacious seating arrangement. The introduction of rough stone seating further contributes to a naturalistic-feel within the development. It is acknowledged that these proposals fall outside of the application boundary and will be subject to agreement with the City of London	
8. HERITAGE GARDEN	N/A	
9. STREET TREES	EXISTING	PROPOSED
	n/a	n/a
10. SERVICING VEHICLE TRIPS	EXISTING	PROPOSED
	Approximately 40	16
11. SERVICING HOURS	To be agreed via detailed Delivery and Servicing Management Plan to be secured by condition, subject to planning.	
12. VOLUME OF RETAINED FABRIC	Percentage of retained substructure by mass = 90%	
13. OPERATIONAL CARBON EMISSION SAVINGS	Improvements against Part L 2021 baseline: 13% GLA Requirement: 35%	

14. OPERATIONAL CARBON EMISSIONS

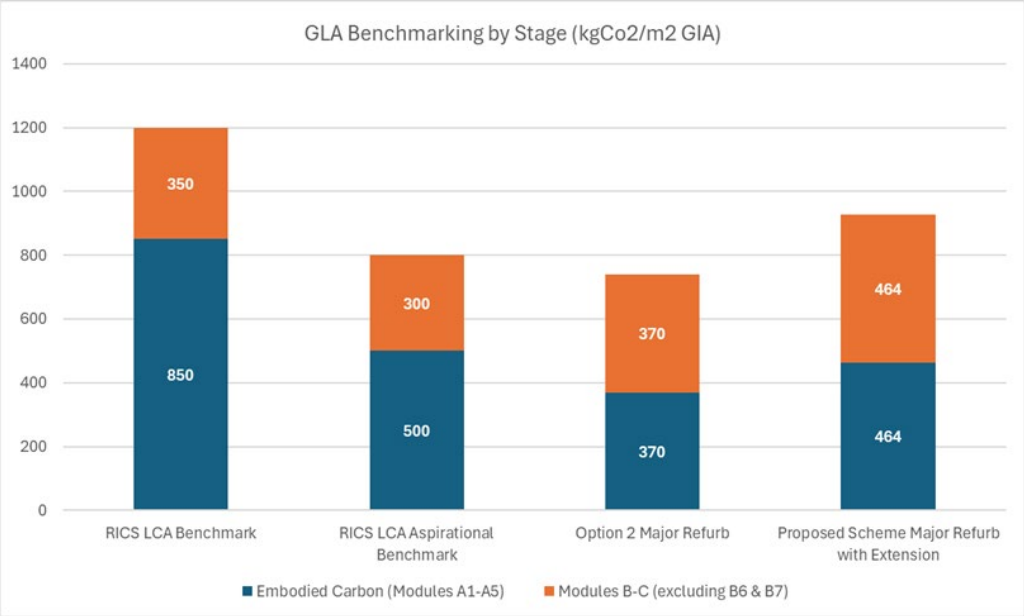
Operational Carbon Emissions

Table 5- Operational Carbon Emissions Results

Category	Totals (kgCO2e)
Operational Energy	4,285,719
Operational Water	636,340
Total	4,922,059

PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS

15. EMBODIED CARBON EMISSIONS



16. WHOLE LIFE CYCLE CARBON EMISSIONS (kgCo2e/m2 GIA)

Assessment 1 – Embodied Carbon over the Life Cycle

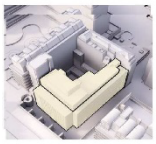
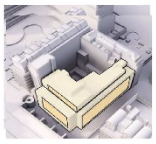
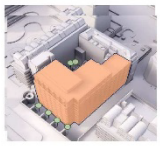
Table 6- Assessment 1 LC Results

Module	Module Description	Totals (KgCO2e)
A1-A3	Product Stages	3,930,367
A4	Transport of Equipment and Materials	351,751
A5	Construction	490,966
B2	Maintenance	69,880
B3	Repair	17,470
B4	Replacement and Refurbishment	2,076,881
B6	Operational Energy Use (Regulated & Un)	4,285,719
B7	Operational Water in Use	636,340
C1	C1 Deconstruction / demolition	2,305
C2	Waste transport	57,115
C3	Waste processing (excl. Biogenic Carbon)	263,958
C4	Waste disposal	527
	Total	12,183,279

Assessment 1 resulted in a total LCA emissions of 12,183,279 as displayed in Table 6.

The table displays the breakdown in the different life cycle modules.

17. WHOLE LIFE-CYCLE CARBON OPTIONS	

Applicable	Option 1 Minor refurbishment	Option 2 Major refurbishment	Option 3 Major refurbishment with extension	Option 4 New build
Photo				
Project reference period	60	60	60	60
Gross Internal area (GIA) m²	4,383	4,383	7,175	7,175
Net Internal area (NIA) m²	2,773	2,773	4,103	4,103
Change in NIA (compared to existing) m²	0	0	1,330	1,330
Substructure % retained by mass	100	100	90	0
Superstructure (Frame, Upper floors, Roof, Stairs and ramps) % retained by mass	100	100	66	0
Superstructure (External walls, Windows and External doors) % retained by area	99	38	0	0
Existing Building Demolition & Deconstruction (C1) [kgCO$_2$e/m² GIA]	0	0	0.32	3.40
Upfront Embodied Carbon (A1-A5) excl. sequestration [kgCO$_2$e/m² GIA]	242	370	464	704
In-use & End of Life Embodied Carbon (B-C) excl. B6 & B7 [kgCO$_2$e/m² GIA]	446	463	420	391
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) [kgCO$_2$e/m² GIA]	**688**	**833**	**884**	**1,095**
Estimated Whole Building Operational Energy [kWh/m² GIA per year]	162	151	101	93
Total [kgCO$_2$e/m² GIA]	**2,176**	**2,280**	**1,175**	**1,902**

18. TARGET BREEAM RATING	Excellent – 78%
19. URBAN GREENING FACTOR	0.22
20. AIR QUALITY	The proposed development is ‘car-free’ so will not generate any additional traffic on the local road network. Future residents will experience acceptable air quality from existing sources. The proposed emergency diesel generator will also not have a significant impact on local air quality or the proposed development itself. During the construction works, a range of best practice mitigation measures will be implemented to reduce dust emissions and the overall effect will be ‘not significant’; appropriate measures have been set out in this report, to be included in the Dust Management Plan for the works. Overall, the construction and operational air quality effects of 45 Beech Street are judged to be ‘not significant’. The proposed development has also been shown to meet the London Plan’s requirement that new developments are at least ‘air quality neutral’.

Main Report

Site and Surroundings

1. The application site fronts Beech Street and Bridgewater Street, and is located adjacent to the north side of the Barbican Estate. The existing building was constructed in the 1950s, prior to the Barbican Estate. It is predominantly eight stories high, with a basement level and plant at roof (ninth story) level. There is existing mobile equipment, including a mast, situated on the roof.

2. The building is joined to Bridgewater House to the north which is a residential property. To the west is Bryer Court which is also residential. The three buildings enclose a courtyard area and ramped access which leads from Bridgewater Street into the basement of the Site.

3. To the west of the Site is Ben Jonson House which sits on the opposite side of Bridgewater Street. To the south is the Beech Street highway tunnel which runs underneath the Barbican podium. The ground and first floor of the Site therefore face into the tunnel whereas the upper floors overlook the Barbican Podium.

4. The existing use of the building is as an office (Use Class E), with 5,284sqm (GIA) of office floorspace.

5. The surrounding area has a mix of uses, including The Barbican Arts Centre (Sui Generis), a mix of commercial (Class E) including offices and restaurants, drinking establishments (Sui Generis), Hotels (Class C1) and residential (Class C3). The site falls into one of the City of London designated residential areas, as defined by Policy DM21.1 of the adopted Local Plan.

6. The site is not itself a listed building, nor a “non-designated heritage asset”, and it is not within a conservation area, though it is adjacent to the following heritage assets:
   - The Barbican Estate (Grade II listed.)
   - Barbican Estate Registered Historic Park and Garden (RPG) (Grade II*)
   - Barbican and Golden Lane Conservation Area

7. There are no other designations or constraints relevant to the Site or the proposals.

Site Planning History

8. A planning performance agreement (PPA) was entered into in July 2023 between The City of London and Beech Street Ltd. (the applicant). A series of meeting were held until December 2023, and officers worked closely with the applicant team to discuss and progress the scheme. Officers have also

worked closely with the applicant team from submission and validation of the application though to the determination to ensure internal and external consultation replies were responded to and addressed.

9. The planning records below represent those most relevant to the proposed development:

10. 21/00561/DPAR Prior Approval given on 24 August 2021: Upgrade of an existing telecommunications base station, comprising of the mounting of 3 no. existing antennas and removal and replacement of 3 no. antennas on 3 no. replacement antenna support poles (2 no. 6m tall poles to a height of 32.5m and 1 no. 5.2m tall pole to a height of 32.0m), supporting 4 no. antennas at 32.5m to top and 2 no. antennas at 30.0m to top and mounting of a GPS module on the top of one of the support poles; the siting of one new rooftop cabinet and relocation of 1 no. existing rooftop cabinet and ancillary works.

11. 1698B - Erection of a 7-storey block of offices at 43, 43a & 44/46 Barbican & 2/8 (inc.) Bridgewater Street

Neighbouring Planning history:

6-9 Bridgewater Square:

12. 1725Q Granted on 4 March 1997: Use of all upper floors for residential Class C3 purposes (19 units) and part ground floor for A1 retail use with remainder to be ancillary to residential above. Addition of new seventh floor, extension and alterations to sixth floor and new fenestration of rear elevation and ground floor front elevation. New entrance to front elevation. (Amendment to planning permission 96-1725P dated 08/11/96).

13. 1725R Granted on 25 November 1997: Change of use of basement and part ground floor from offices (Class B1) to restaurant (Class A3).

Current Proposals

14. Planning permission is sought for the partial demolition, extension and change of use of the 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.

15. It is proposed to demolish the top two existing stories, and plant above - equating to 957sqm (GIA). It is proposed to build four new stories equating to a total of 2,641sqm (GIA) of new floorspace. This would equate to a 1,684sqm

increase in floorspace and result in a final building comprising 6,968sqm (GIA) of co-living floorspace (Sui Generis).

16. 174 Co-living private units, with en-suite shower rooms and kitchenettes would be provided. Communal areas proposed include a kitchen and dining room, two co-working rooms, reception and a cafe at ground level, and a gym, a laundry room and a TV room in the basement. A communal roof terrace is also proposed at 9th floor level.

17. There would be one accessible parking space provided on-site, within the courtyard area. 134 long cycle spaces, and 12 short stay spaces are proposed.

Consultation

Statement of Community Involvement

18. The applicant has submitted a Statement of Community Involvement prepared by London Communications Agency (February 2024). Engagement on the proposals was primarily conducted in two phases between June and October 2023.

19. Phase 1 included early briefings and introductory letters sent by email to key stakeholders including ward member and representatives of key local groups, which aimed to introduce the Applicant and the Site and invited members to an early briefing on the scheme and the Applicant's vision. A briefing with local ward members was subsequently held on 24 July 2023, and a workshop for local representatives was on 02 June 2023.

20. Following its initial briefings with local representatives and resident groups in June and July 2023, in phase 2 of the public consultation the applicant undertook wider engagement around its detailed design proposal for the site in September 2023. A follow up public workshop was held with local resident groups on 15th September 2023, attended by 8 representatives. A Ward member preview event was held on 27th September 2023, attended by 3 ward members.

21. Two in-person public exhibition events were held on Thursday 28th September 2023, and Saturday 30th September 2023, attended by a total of 69 attendees.

22. Furthermore, as part of the community engagement, the applicant has circulated a double sided A4 newsletter introducing the project and applicant team, which was sent to 2553 addresses surrounding the site on 6th September 2023. A consultation website was launched in-line with the

newsletter A freephone line and email address have been set up to allow the community to contact the applicant team.

23. Feedback from the community engagement included:
    - Concerns raised towards daylight and sunlight impact to neighbours
    - Comments / concerns surrounding the design and height of the proposed facade and extension
    - Robust management of the development would be important to alleviate any noise and disturbance concerns, transport and traffic impacts
    - Construction impact concern
    - Clarity over the proposed co-living use and affordability
    - Concern raised and suggestions regarding the proposed design and materials
    - Support shown for proposed cafe and co-working facilities

Statutory Consultation

24. As part of the current application, the City of London Corporation acting as the Local Planning Authority ('LPA') has undertaken consultation with neighbouring residents and other stakeholders in line with statutory duties.

25. Barbican Association: Objection - Support the addition of much needed housing in the City, but raise concerns over a number of issues with regard to loss of residential amenity including: Noise and disturbance and loss of privacy resulting from external spaces, roof terrace and balconies; increased height and massing would result in overlooking and loss of daylight and sunlight. Request that restrictions on the timing and uses of the communal external spaces be applied.

26. Barbican and Golden Lane Resident Association: Objection - 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 3 month minimum terms, should be enforced.

27. Barbican and Golden Lane Neighbourhood Forum: Objection - Support the principle of the conversion of the office block to a co-living scheme, however raised the following concerns: 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 terms.

28. Ben Johnson House Group: Objection – Height, mass, loss of sunlight and daylight and other amenity impacts. Inappropriate design (barrel vaulted roof). Noise and disturbance from additional residents and other activity, co-working/cafe, terrace, events, courtyard and private balconies. No. of residents should be controlled by condition (i.e. single occupancy only). Delivery and servicing impacts. Existing levels of pollution on Beech Street would be exacerbated. Impact on local services (i.e. open space and doctor surgeries).

29. Historic England: Did not wish to comment

30. Gardens Trust: Commented that they had some concerns about the effect of the height and massing of the proposed development on the significance of The Barbican Registered Park and Gardens. Also noted that the proposed additional residents would add pressure on the capacity of the gardens.

31. Health and Safety Executive: No Objections, content with the fire safety design as set out in the project description. However, some matters were identified, that the applicant should try to address, in advance of later regulatory stages.

32. Thames Water: No Objections, subject to conditions relating to submission of details of Infrastructure/network upgrades, no building within 5m and 3m of strategic and water mains respectively.

33. Environmental Health: No objections, subject to conditions relating to hours of use of external areas, restrictions on amplified/live music, restricted servicing hours, restrictions on plant noise, construction scheme of protective works, sound insulation for co-living units, cooking extract details and lighting strategy details.

34. Lead Local Flood Authority: Recommended conditions requiring full details of the proposed SUDS strategy to be submitted and approved by the Local Authority.

35. City of London Waste Division: No Objections

36. Neighbour letters were sent to 977 surrounding residential properties on 5 March 2024; site notices were posted on 29 February 2024, and the applications were advertised via the weekly list and notice in City AM on 27 March 2024, and in the ‘weekly list’.

37. Following submission of amendments, surrounding residents were re-consulted on 6th August 2024.

38. In response to the consultations 66 objections have been received in total. Copies of all received letters and emails making representations are attached in full and appended to this report. A summary of representations received is set out in the table below. These are summarised into key 'themes' of objection and include some direct quotes from representations received, as well as officers' response to the comments.

Representation Themes (Objection)	**Example comment(s)**	**Officers' response / paragraph(s) where addressed**
Co-Living Use	*This is not the place for temporary accommodation for people who will be renting the properties.* *We object to co-living, since there is no proven need for short term accommodation, rather the area and London as a whole needs permanent housing of a mixed type and tenure including affordable homes.* *Tiny studios, the inadequate cooking facilities, and the general overcrowding suggest a short-term housing idea, not long-term decent homes.* *It is intended for transient people who will contribute little to the social fabric of the area and may contribute greatly to reducing quality of life for many permanent residents.* *Suggestion there should be 3 month minimum tenancies.* *The building will be used 24 hours a day 365 days a year and there will be constant hubbub generally much greater than in a simple block of flats. It will be suitable for a younger demographic who are more inclined to socialise and make additional noise to older demographics (this is not a criticism). Potentially it will create a buzzing*	Co-living is supported in this location in principle, it is a form of housing, contributing to The City's Housing targets, including a contribution towards affordable housing. See Principle of Development section of report. The quality of the proposed accommodation has been assessed to be acceptable in line with the relevant policies and guidance. 3 month minimum tenancies would be secured as an obligation in the Section 106 agreement and as part of the Operational Management Plan.

	atmosphere around the building with constant movement all hours of the day and night. A complete change from the quiet atmosphere at present.	Officers are satisfied there would be no unreasonable impact resulting from noise and disturbance, subject to recommended conditions. See Amenity section of this report.
Design	*The scheme is poorly designed and insensitive to the Barbican estate listed building, conservation area and heritage setting, in particular the pastiche barrel roofs.* *The building is too large, too high, one storey should be removed to ensure the building is subsidiary to the power blocks on either side.* *The scale and massing is too large for this infill site.* *As its new upper floors thrust forward from the previous building line, and beyond the line of its neighbours, they will appear much more dominant.* *The south facade is not aligned with the Barbican.* *The design's blandness obscures its role in the creeping degradation of the Barbican's setting.* *The proposed continuously sprung vaults of the 45 Beech street proposal create a bulky high level massing which is crude and out of proportion with the adjacent terraces.*	Design officers have concluded the proposed design to be compatible with the existing context in terms of scale and massing and be read as a well-layered piece of design, which would improve the building's contribution to the local townscape. See Design and Architecture section of this report.
Amenity	*The height of the proposed building will have an adverse impact on residential*	Officers have assessed the amenity impacts to be acceptable overall –

	amenity including views, loss of daylight and sunlight light and loss of privacy. *The significant increase in the height of the building will inevitably cause both yet more shading nearby and yet more wind turbulence.*	see Amenity section of the report. The additional 2 stories would not be expected to require testing with regards to wind.
Noise and Disturbance	*Potential for noise pollution from the proposed outdoor spaces/ terrace/ balconies.* *We object to suggested informal use of the courtyard, the noise already bounces right up through the space, and risks being a nuisance to existing residents.* *The opening windows of the flats also present a risk of noise and disturbance.* *According to the proposal, the development is mainly aimed at young professionals working in the City of London and surrounding areas on a relatively short term basis. Consequently, it is unlikely that they will have the same level of consideration for Barbican residents as do those already living in the Barbican Estate. Any noisy behaviours on the new balconies and on the roof terraces would be very detrimental to Barbican residents.* *Possibility for live events and amplified music at the site (external and internal amenity spaces).*	The outdoor spaces cannot be used between 10pm and 7am on any day of the week as a condition of development. Furthermore, music would be prohibited in the outdoor amenity areas and this is recommended as a condition of development. Noise from inside residential units is unlikely to be a concern, as this is a residential area and the units are single occupancy. The management will be responsible for ensuring any disturbance resulting from the use of external spaces and the property generally is quickly dealt with. A full co-living operational management plan is to be secured by section 106 agreement.

		It would be a condition of development that 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. Environmental health officers would investigate any breaches.
Privacy	*Will create a significant loss of privacy to the residents opposite who would be in the direct sightlines of both residential windows and a new high-level terracing.* *The additional height, with the change from office to housing, will regrettably result in a loss of privacy.*	Officers assess there would be no unreasonable loss of privacy resulting from the proposed extension or change of use to co-living. See the Privacy sub-section of the Amenity section.
Daylight and Sunlight	*Building further storeys will remove the light from our flat and most of the others in the front of the Cobalt Building making them less pleasant to live in.* *We wish to object to this application on the grounds of a reduction in daylight and sunlight.* *The western side of Breton House already suffers a loss of afternoon/ evening sunlight - and heat - from the additional height of Clarendon Court over Bernard Morgan House while awaiting a similar fate from 1 Golden Lane. The above evidence confirms that extra floors have a significant effect on residential amenity.*	Officers' full assessment is set out in Daylight and Sunlight Sub-section of Amenity section of this report.
Transport and servicing impacts	*Traffic and disturbance resulting from frequent moving in and out of residents* *Additional traffic from comings and goings and delivery and servicing activity, are proposed facilities adequate?*	Transport Statement trip generation assessment suggests reduction in movements compared to office use.

	We would question how the new flats will be adequately serviced. This, too, would generate traffic in the tunnel during otherwise quiet times and would mean further disturbance.	Condition recommended for no overnight or Sunday servicing to protect amenity of residents. Delivery and servicing plan to be secured by condition.
Construction Impacts	*Construction noise - no Saturday working must be enforced and how is this to be controlled?* *working hours must be limited to 9am - 5pm Monday to Friday and the developer must put up* *acoustic barriers to block noise / vibration during the refurb* *Additional construction traffic, road closures etc.*	Construction Management Plan to be secured by condition. See Transport and Highways section of this report.
Sustainability	*The unnecessary additional embodied carbon in the proposed roof, as opposed to a flat one, as well as other sustainability issues needs to be addressed. If the Climate Action Strategy has any relevance, the proposed roof must be rejected*	The overall whole life-cycle carbon emission impact of the development is considered to be acceptable. See sustainability section. The roof design is considered to be acceptable. See design and heritage section.
Other	*There is a very high likelihood of anti social behaviour affecting the Barbican estate.*	New residential development in a residential area is not considered to be a source of anti-social behaviour by officers. Notwithstanding, the draft Operational Management sets out how anti-social behaviour is to be managed, and a full co-living operational management plan to be secured by section 106 agreement.

Air Quality	*Not opposed to this redevelopment in principle, but the inclusion of a tall flue for emergency generator exhaust raises some concern.*	Plans have been submitted showing the location of the generator flue, this is 1m above the roof level and not located close to any air intakes, and the air quality officer considers this to be acceptable. A condition is also recommended requiring additional information to be submitted for approval with regards to the generator.

Policy Context

39. The Development Plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

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

41. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2023 and the Planning Practice Guidance (PPG) which is amended from time to time.

42. The Historic England Good Practice Advice notes, including Note 3 The Setting of Heritage Assets and Note 2 Managing Significance in Decision-Taking in the Historic Environment.

43. The Mayor of London's Large Scale Purpose Built Shared Living (LSPBSL) Guidance document provides direction and recommended benchmarks for the design and assessment of all applications with LSPBSL (also known as co-living).

44. Relevant City Corporation Guidance and SPDs includes the Barbican and Golden Lane Conservation Area Appraisal (City of London, 2022) and Barbican Listed Building Management Guidelines Vol. II (City of London, 2012).

Considerations

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

46. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (Section 66(1) Planning (Listed Buildings and Conservation Areas) Act 1990). This duty must be given considerable weight and importance when weighing any harm to the setting of a listed building in the balance with other material considerations.

47. The National Planning Policy Framework (NPPF) states at paragraph 2 that "Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise".

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

49. Paragraph 10 of the NPPF states that "at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:
    a) approving development proposals that accord with an up-to-date development plan without delay; or
    b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

(i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
(ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

50. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
    a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
    b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
    c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

51. Chapter 5 of the NPPF seeks to deliver a sufficient supply of new homes. Paragraph 60 states it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community. Paragraph 62 states that housing uplift should generally be accommodated within cities and urban centres themselves, based upon a housing needs assessment.

52. Chapter 6 of the NPPF seeks to build a strong, competitive economy. Paragraph 85 states decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

53. Chapter 8 of the NPPF seeks to promote healthy, inclusive, and safe places.

54. Chapter 12 of the NPPF seeks to achieve well designed places. It advises that "The creation of high quality and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities."

55. It goes on to set out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, are visually attractive and sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and create places that are safe, inclusive and accessible and which promote health and wellbeing.

56. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment, it advises that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

57. It goes on to advise, "In determining applications, local planning authorities should take account of:
    a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
    b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and I the desirability of new development making a positive contribution to local character and distinctiveness."

Main Considerations

58. In considering the application for planning permission account has to be taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.

59. The principal considerations in this case are:
    - The extent to which the proposals comply with the development plan
    - The extent to which the proposals comply with the NPPF
    - The principle of the loss of existing office (Class E) space
    - The principle of providing co-living (sui generis) residential
    - The impact of the development in design and heritage terms (including indirect) to the setting of the special architectural and historic interest and heritage significance of the Barbican Estate.
    - The impact of the proposal in terms of energy and sustainability

- The impact of the proposed development on the amenity of residential occupiers, both within and adjacent to the proposed development with regards noise, access to daylight and sunlight, and general amenity.
- The transport and highway impacts of the proposal
- Consideration towards impacts upon Human Rights and Equality

Principle of the loss of office

60. London Plan Policies E1 and SD4 support the increase in office floorspace and the internationally significant office functions of the Central Activities Zone (CAZ). Core Strategic Policy CS1 'Offices' of the Local Plan and Strategic Policy S4 'Offices' of the draft City Plan seek to ensure that the City provides additional office accommodation to meet demand from long term employment growth. Local Plan Policy DM1.1 'Protection of office accommodation' and draft City Plan Policy OF2 'Protection of existing office floorspace' seek to protect office accommodation.

61. Loss of office floorspace is generally resisted when the site is considered suitable for long-term viable office use, in accordance with the Local Plan Policy DM1.1 and the Office Use Supplementary Planning Document (SPD).

62. The Office Use SPD and, in particular paragraphs 28 and 29, set out the information requirements to justify the loss of office. In order to be able to fully assess and establish whether the loss of office space would be acceptable, the following evidence must accompany an application:
    - marketing of the building for office use;
    - valuation of the building in its current use, establishing an Existing Use Value;
    - viability appraisals of the building to demonstrate the longer term unviability for continued office use (the assessment should also consider the viability of refurbished office space and a refurbished office space including extension of the building to match the building envelope of the proposed co-living use).

63. The applicant has submitted a financial viability assessment (DS2, dated January 2024). The report considered three scenarios: 1. Light refurbishment only, 2. Category A refurbishment including improved sustainability, and 3. Demolition of existing building and construction of a new office building, reflecting the same overall building envelope as the Proposed Development of a co-living scheme.

64. The Financial Viability Assessment concludes that both refurbishment scenarios and the new build scenario result in deficits when compared to their Benchmark Land Value.

65. Acting as independent third-party reviewer, BNP Paribas have appraised the assumptions and conclusions of the submitted financial viability assessment in their Review of Financial Viability Assessment (BNP, March 2024) and carried out their own analysis. They have adopted the majority of assumptions, which are agreed, and their own assumptions where they are not in agreement. Most significantly, they have identified significant flaws in DS2's Benchmark Land Value (BLV) and have therefore adopted a nil Benchmark Land Value.

66. Based upon BNPs own assumptions, the appraisals result in a surplus for all three scenarios: £7.61mil for Scenario 1, £0.3mil for Scenario 2, and £1.98mil for Scenario 3.

67. However, BNP have also undertaken IRR analysis which calculates the rate of return over an assumed hold period. This is reasonable as arguably a zero BLV is more reflective of the intentions of the Planning Practice Guidance, as the site value should reflect existing use value, which in this case is low or zero, given the lack of office demand for the building, set out in the marketing details submitted.

68. This results in an IRR of 8.18% for Scenario 1, 8.26% for Scenario 2 and 8.30% for Scenario 3, which are all below the level of return an investor would consider reasonable for the investment. The results conclude that the refurbishment of the existing building as offices generates a return which is considerably lower than what is an acceptable market benchmark. In addition, a new build office development would also result in a lower than acceptable level.

69. There are constraints of the existing building which limit its commercial desirability for continued office use and officers consider the building is not likely to be capable of being redeveloped either partially or wholly to provide the high-quality office space currently needed.

70. The findings of the City of London Corporation Future of Office Use report (Knight Frank, Arup) support the argument set out in the applicant's viability report which recognised the current trend of investment in the highest class of Grade A or above offices. It concluded that the projections for higher office demand up to 2040 "do not account for the challenges faced by some existing lower grade stock in the City", and suggested, "that intervention is needed to

allow for fewer obstacles for older stock to be updated to meet office market needs, or to convert to other uses".

71. Turning to marketing requirements as set out within the City of London Office Use SPD, the FVA includes marketing information and evidence within its appendices. This information comprises a schedule of competing serviced offices within a ½ mile radius of the site, a schedule of vacant office space within a ½ mile radius of the site, and a table detailing vacancy rates at the site over a 58-month period prior to submission of the application. Overall, this information demonstrates that in the specific context of 45 Beech Street there are competing office spaces nearby and a significant amount of available vacant floorspace in the nearby area, as well as demonstrating that the site has suffered from falling occupancy and increasing vacancy across the 58-month period detailed within the relevant appendix. This position is then supported by the FVA and its conclusion that the building cannot viably continue to be used as office floorspace into the future.

Loss of Office Summary

72. In light of the submitted FVA, as independently reviewed by BNP, the proposed loss of the office is therefore considered acceptable, as it has been demonstrated that there is no realistic prospect of continued long-term office use of the site.

73. Due to this, and considering the location, the loss of this office use is not considered to prejudice the primary business function of the City, nor would it jeopardise the future assembly and delivery of large office development sites; nor introduce uses that adversely affect the existing beneficial mix of commercial uses.

Proposed Co-Living Housing (Sui Generis)

74. Strategic Policy CS21 of the adopted Local Plan supports refusing new housing where it would prejudice the primary business function of the City or be contrary to Policy DM 1.1 (Protection of Office Accommodation). In this case as it has been demonstrated that the existing office building cannot viably continue in office use, and that in this location the proposed co-living housing would not prejudice the primary business function of the city.

75. Co-living, also referred to as Large-Scale Purpose-Built Shared Living (LSPBSL) is a form of non-self contained housing, generally made up of at least 50 private individual rooms together with communal shared spaces and facilities. This type of accommodation is seen as providing an alternative to

traditional flat shares and includes additional services and facilities, such as room cleaning, bed linen services, on-site gym facilities and concierge service.

76. The use of Co-Living is not defined as C1 (hotels), C2 (residential institutions), nor C3 (self-contained housing) as it is distinct from those uses. It is therefore a Sui Generis use class.

77. Policy DM 21.1 Location of new housing states: New housing should be located on suitable sites in or near identified residential areas. Within these areas a mix of appropriate residential and commercial uses will be permitted; and that new housing will only be permitted where development would not:
    - prejudice the primary business function of the City;
    - be contrary to policy DM 1.1;
    - inhibit the development potential or business activity in neighbouring commercial buildings and sites; and
    - result in poor residential amenity within existing and proposed development, including excessive noise or disturbance.

78. Strategic Policy S3: Housing of the draft City Plan 2040, which now has some limited weight, encourages additional housing on appropriate sites in or near identified residential areas, prioritising the delivery of affordable housing, **co-living,** build to rent, hostels, sheltered and extra-care housing, while recognising that for sale market housing would be likely in some instances to have a role to play in making housing development viable.

79. New housing should be refused where this would protect the business function of the City or where such proposals would be contrary to Policy OF2, or result in poor residential amenity within either the existing or proposed development, including excessive noise or disturbance.

80. The site is within a designated residential area as identified in the adopted Local Plan. There are a relatively large number of existing residential properties surrounding the site, and therefore the site is considered to be suitable for the proposed co-living residential use in principle.

81. London Plan Policy H16(A) states Large-scale purpose-built shared living development must meet the following criteria:
    (1) it is of good quality and design;
    (2) it contributes towards mixed and inclusive neighbourhoods;
    (3) it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency;

(4) it is under single management;
(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: a) convenient access to a communal kitchen b) outside communal amenity space (roof terrace and/or garden) c) internal communal amenity space (dining rooms, lounges) d) laundry and drying facilities e) a concierge f) bedding and linen changing and/or room cleaning services;
(7) the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes;
(8) a management plan is provided with the application.

82. As concluded in the Architecture and Public Realm Design section later in this report, the proposal is considered to positively integrate with its surroundings, ensuring good-quality design, and in turn contributing positively to mixed and inclusive neighbourhoods and the proposed Co-Living development is considered to be well designed in line with H16 (1 and 2).

83. The location is considered suitable, and the proposal would contribute to mixed and inclusive neighbourhoods in this existing predominantly residential area of The City in line with H16(2). There are no other co-living developments within the immediate vicinity, so the proposal would not result in an over-concentration of this kind of housing.

84. Having a PTAL of 6b, the site is one of the best connected in London, and it would not contribute to car dependency in line with (3) as the only parking provided would be for disabled residents. Furthermore, due to the location and type of housing proposed, it is considered unlikely residents would own a vehicle. A clause in the Section 106 agreement would prohibit any future resident (other than disabled residents) from securing a residential parking permit.

85. The site would be under the single management of the applicant, a single operator, in line with (4). The submitted planning statement (in line with 8) confirms that tenancy lengths would be no less than 3 months, and this minimum tenancy length would be secured within the Section 106 agreement, in line with (5).

86. Communal facilities are provided in line with (6) and the private rooms are of an acceptable quality in line with (7), as assessed in the following sub-section.

87. A draft Operational Management Plan (HubCap, February 2024) has been submitted in line with (8). This sets out high level details of how the development would be managed, including measures to control the potential for residents to generate unreasonable levels of noise which could result in harmful disturbance to neighbouring residents. The final management plan would be secured as part of the Section 106 agreement.

88. The London Plan recognises that co-living schemes count towards meeting housing targets on the basis of a 1.8:1 ratio, with 1.8 co-living bedrooms/units being counted as a single conventional home. This approach to monitoring net housing provision from different forms of non-self-contained accommodation is based on the amount of self-contained housing this form of supply would expect to free up.

89. The Proposed Development is therefore equivalent to 97 conventional homes, which makes a substantial contribution to the City of London's housing supply targets.

Quality of private accommodation and communal facilities

90. As noted above, Policy H16 states co-living, or Large Scale Purpose Built Shared Living (LSPBSL), proposals are required to be of good quality and design, communal facilities must be sufficient, and private units must provide adequate functional living space with appropriate layout, and must not be self-contained homes. There are currently no minimum space standards for communal and private areas of this type of accommodation. Given the generally small size of the private space in these developments, the communal amenity spaces are important elements in ensuring that the quality of the overall residential amenity is acceptable.

91. In February 2024, the Mayor of London adopted the Large Scale Purpose Built Shared Living London Plan Guidance (LSPBSL LPG), and officers note that this was adopted very soon after submission of the current application. This document provides additional guidance to LPAs and developers on the design quality of this type of housing.

92. As a minimum, communal facilities should enable all residents to cook; prepare and eat meals; relax and socialise, including with guests; work from home and; do laundry. Table 3.3 of the LSPBSL LPG sets out the required and optional types of internal communal facilities that should be included in LSBPSL development. Recommended benchmarks for communal indoor space provision, and for the design of kitchens, dining spaces, laundry facilities, living rooms, lounges and workspaces, are also set out in the table below.

93. The LPG states that recommended benchmarks are based on current best practice of operating LSPBSL developments. Some flexibility in the assessment of LSPBSL applications against these recommended benchmarks may be applied to the design, scale and provision of these facilities in consideration of the site's location and context, or other scheme-specific factors where it is demonstrated that qualitatively good design outcomes are being achieved.

94. Communal areas should be inclusive; well designed; adequately sized; well ventilated; conveniently accessed; and sufficient to meet the requirements of the anticipated number of residents and should allow for flexible use to give residents a sense of autonomy and community. Provision of some public (non-resident) access to elements of the communal facilities is encouraged, to promote integration of the LSPBSL with the local area. Facilities open to the public may count towards resident communal space requirements where they are integrated within the building; managed by the operator; and accessible to residents at least 12 hours a day, six days a week.

Daylight and sunlight to the communal areas

95. The proposed development is over 11 stories, including Basement, Ground and Levels 1-9. The proposed basement would provide an equipment gym, and a smaller gym studio; a laundry room with direct access to the courtyard external amenity space; a TV room; and storage space. It would also contain the bicycle parking and refuse store, as well plant.

96. The Laundry room would be naturally lit with a glazed door and window facing west into the courtyard and four rooflights. The gym would also be served by several windows and a glazed door. It is considered acceptable for the TV room to not be served by any windows, as dark conditions are often required for a TV/cinema room.

97. The proposed ground floor would provide the shared kitchen, a resident co-working space, a public and resident cafe/lounge and Co-Working Lounge either side of the main reception area (which would be open to residents at all times and to the public only during certain hours or for events); Main entrance and reception, 4 toilets including 1 accessible WC.

98. The proposed kitchen would be served by three large windows facing onto Bridgewater Street (East) and the cafe/lounge by four large windows facing onto Bridgewater Street, and Beech Street. The Co-Working reception and Lounge would have 2 large windows facing onto Beech Street, and the Residents Co-Working area would be served by a large array of windows,

spanning the full curvature of the internal courtyard wall at ground level. The private dining and multi-purpose rooms would also be served by large windows.

99. The proposed external amenity areas are located on the roof at 9th floor level, and at ground floor level within the existing courtyard, which will be terraced and landscaped.

100. An assessment of daylight and sunlight to the proposed accommodation (Anstey Horne, February 2024), has been submitted, and this has been independently reviewed by BRE in their report dated 12 July 2024. A selection of communal areas and habitable rooms in the scheme have been included in the Anstey Horne assessment. These include two co-working areas, a dining room and kitchen on the ground floor and a total of 96 of the studios on the first, third, fifth, seventh and ninth floors.

101. The assessment for sunlight provision has been carried out by Anstey Horne using the recommended methodology. The communal roof level amenity space was also assessed for sunlight provision using the recommended methodology.

102. None of the ground floor communal spaces would meet the daylight provision targets used in the assessment. This is due to the deep plan layout proposed for these spaces and, to some extent to the inherently limited daylight availability to proposed windows that face into the courtyard. Daylight levels are considered reasonable in areas closest to windows, but these spaces taken as a whole would not receive adequate daylighting, when compare to the BRE Guidance, and reliance on artificial lighting would be required, particularly in areas away from windows.

103. BRE suggest that for a proposed open space to be well sunlit at least 50% of its area should be able to receive at least two hours of sunlight on 21 March. The assessment results suggest that 63% of the area of the roof terrace amenity space would be able to receive at least two hours of sunlight on 21 March, compared to the 50% target, thus meeting the BRE guideline.

104. The courtyard external space has not been tested, however, due to the existing built form around this space, it is unlikely to receive any significant hours of direct sunlight, and therefore the quality of this space would be poor in this regard. However, as the proposal is for conversion and extension of an existing building, opportunities to provide additional external space in an alternative location are limited. The area of roofspace proposed as roof terrace, is likely the only acceptable location, due to amenity considerations.

105. When considering the results of the assessment, the constraints associated with the conversion and extension of an existing building on a tight-knit urban site must be taken into account.

106. In this case there is limited scope for the adjustment of the orientation, size and position of the windows. It is also worth noting that the building was originally built for office/commercial use and therefore daylight availability would not have been a key design consideration. Although the BRE guidance gives numerical guidelines, these are intended to be applied flexibly since natural lighting is only one of many factors in site layout design. Where higher density development is desirable there cannot be the same expectation of light as in a suburban or rural context. Furthermore, the Mayor of London's Draft Interim Housing Supplementary Planning Guidance emphasises that fully optimising housing potential may necessitate departure from conventional guidelines whilst still achieving satisfactory levels of residential amenity.

107. Whilst the BRE Guidance in terms of daylight and sunlight would not be met for the majority of the proposed communal spaces, this can be attributed to existing levels of daylight within the building and courtyard which are already limited due to the existing built form and surrounding context. The retention and reuse of the building as a form of housing is a planning merit to which significant weight is given by officers and officers consider therefore, that the provision of natural light to the proposed communal areas is considered acceptable in this case.

Size and layout of communal facilities

108. The breakdown of the different communal areas proposed by area is in the table below.

Area / facility (Required **or O**ptional**)**	**Included in total communal space requirement (Y/N)**	**Min. Recommendation / Benchmark**	**Proposal**
Total internal amenity space (174 residents) (R)	N/A	622sqm	690 Sqm (485sqm at ground floor level and 205sqm at basement level)

Kitchen (R)	Y	87sqm, 12 cooking stations.	Approx 100sqm combined kitchen and dining area, 12 cooking stations
Dining (R)	Y	26 spaces	26 spaces included in communal kitchen area Approx 100sqm combined kitchen and dining area
Laundry (R)	Y	5 washers and 5 dryers	9 washers and 9 dryers (stacked) 24.9 Sqm
Living Room / Lounges (R)	Y	No recommended minimum	75 Sqm Café 69.3 Sqm Combined Public Lounge and Co- working space 97 Sqm Combined Residents Lounge and Co-working space
Other (O)	Y	N/A	35.3 Sqm Entrance 11.7 Sqm Reception 22.7 Sqm Multi-purpose room 1 19 Sqm Multi-purpose room 2 85.5 Sqm Gym 27.9 Sqm Gym studio 47.7 Sqm TV Room
Workspace (O)	Y	N/A	69.3 Sqm Combined Public Lounge and Co- working space 97 Sqm Combined Residents Lounge and Co-working space
Toilets (R)	N	N/A	3.5 Sqm Accessible WC ground floor 16.3 Sqm Toilets ground floor 3.2 Sqm Accessible WC basement

Personal Storage (O)	N	N/A	There are two stores in the basement. Function and area distribution to be determined. 13.2 Sqm store basement (behind lift core) 2.6 Sqm store basement (by TV Room)
External amenity (R)	N	174	137.2 Sqm Communal courtyard 65.2 Sqm Communal roof terrace **Total Shared external amenity** space for residents 202.4 Sqm
Circulation Space (R)	N	N/A	79 sqm lower ground floor circulation 62 sqm ground floor circulation 107 sqm typical floor circulation
Spaces incurring additional cost (O)	N	N/A	No spaces incurring additional cost for residents to use.
Cafe / Restaurant (open to public) (O)	Y conditionally	N/A	75 Sqm Café
Management Storage (O)	N	N/A	There are two stores in the basement. Function and area distribution to be determined. 13.2 Sqm store basement (behind lift core) 2.6 Sqm store basement (by TV Room)
Cycle Storage (R)	N	131 long stay spaces 5 Short stay spaces	134 long stay spaces 12 Short stay spaces 146 spaces in total

Car Parking	N	Car-Free subject to Policy T6.1(E)	1 accessible space on-site.

109. The proposed co-living development would provide sufficient communal facilities for future residents, as demonstrated by the table above.

110. The proposed cooking, dining, laundry, communal living and working spaces individually and in total exceed the minimum areas recommended in the LSPBSL LPG. The proposed layouts are considered to be acceptable, and would provide functional and high quality communal living spaces to future residents.

111. The proposed facilities are suitably inclusive and accessible, and this is discussed further in the Accessibility sub-section of the Architecture, Urban Design and Public Realm section of this report.

112. The proposed external amenity areas, in total exceeds the minimum requirement, and are of an acceptable quality. Final details of landscaping are recommended to be reserved by condition, to ensure the spaces are high quality, and contribute to urban greening.

Assessment of Private Units Quality

113. Policy H16 (7) requires that the private units are not self-contained homes, nor capable of being used as self-contained homes, but provide functional living space. The units should be suitably sized to accommodate the amenities for sleeping, eating, working, relaxing and storage. They should be no less than 18 sqm, and no more than 27 sqm, to avoid them being used as substandard self-contained units.

114. Private units should be designed to receive adequate levels of daylight, sunlight, ventilation, outlook and privacy, and must be protected from internal and external sources of noise, to ensure good-quality living conditions.

115. To meet the requirement of London Plan Policy D5, schemes should provide 10 per cent accessible units. Accessible units are generally expected to be between 28 and 37sqm.

116. A number of different layouts are proposed in the development, but the floor areas are either 20sqm or 21sqm for each of the 6 standard room types. The floor to ceiling heights are 2.5m. This is in line with the guidance set out in the LSPBSL LPG, and therefore the room sizes are considered to be acceptable.

However, none of these rooms are considered large enough for occupation by couples, and therefore each room shall only be allowed to have a single tenant, and this would be an obligation within the Section 106 agreement.

117. Objections have been received relating to guests having visitors stay, but officers feel this would be reasonable usage of one's home. The draft Operational Management Plan sets out how management would deal with noise and disturbance, and this is considered the appropriate way to deal with any issues should they arise in the future.

118. 10% of the rooms are proposed as accessible (17), and these would either be 28sqm or 36sqm. The proposed accessible units are suitably inclusive and accessible with regard to their layouts and the layout of the wider building, and this is discussed in full in the Architecture, Urban Design and Public Realm section of this report. The accessible units would be prioritised for disabled residents and there must not be a rental premium for disabled residents inhabiting these units. Details of management and allocation are to be secured in the Operational Management Plan of the Section 106 agreement.

119. Each of the proposed room layouts include a double bed, a bedside cabinet, a wardrobe, a desk, a kitchenette and an en-suite shower room, in line with Table 3.5 of the LSPBSL LPG. As each of the proposed units would be provided with larger than the minimum floor areas, and each of the facilities recommended by the LPG, the proposed layout is suitable to provide adequate facilities for sleeping, eating, working, relaxing and storage to future residents and are acceptable, in line with Policy H16.

Daylight and sunlight to the private units

120. All private units would be provided with at least one window, and the majority are of single aspect. The submitted daylight and sunlight assessment (Anstey Horne, February 2024) assessed daylight and sunlight to roughly a 50% a sample of habitable rooms from ground to ninth floor levels in the proposed development. Although not all proposed studios have been included in the assessment, the results provided give a reasonable indication of daylight provision levels that can be achieved throughout the entire proposed development.

121. The results for daylight provision to studios as presented in the Anstey Horne assessment are as follows:
    - 43 of 96 studios analysed (or 45%) would meet the kitchen target (200 lux over half of the area and half of annual daylight hours)

- 53 of 96 studios analysed (or 55%) would meet the living-room target (150 lux over half of the area and half of annual daylight hours)

122. The proposed studios are generally more likely to meet the daylight provision recommendations than the communal areas (assessed above) as they are on upper floors and many are facing south towards the Barbican Podium where there are fewer obstructions.

123. Some level of obstruction to daylight is experienced by proposed studios facing west towards Ben Jonson House, particularly on lower floors, whilst proposed studios facing into the courtyard are most heavily obstructed, as expected. Some of these units on lower floors would have a poor provision of daylight, whilst similar units would not be able to meet the recommendations even on the seventh floor.

124. Overall the provision of natural daylight and sunlight to the development is considered to be mediocre. Officers consider this provision to be acceptable, due to the existing built form and context, which is a tight-knit urban grain, with many courtyard facing windows. The existing building is being largely retained, and therefore the opportunity to increase levels of daylight and sunlight into the building through orientation and size of windows is limited. Furthermore, due to the nature of the proposed private units, which are expected to be small and for single occupancy, they are generally only served by one window on a single elevation, limiting levels of daylight that could be achieved, depending on the orientation.

125. On balance, officers consider the provision of daylight to the private co-living units to be acceptable, in line with Policy H16 of the London Plan, and adopted guidance.

Summary for quality of proposed accommodation and communal facilities

126. Overall the provision of communal facilities in terms of size and layouts to be provided are considered acceptable, and good quality facilities would be provided to future residents. The proposed private units would also provide acceptable layouts and room sizes, as well as suitable facilities for day-to-day living.

127. The provision of daylight and sunlight is considered to be mediocre overall, and some of the private units, and most of the communal areas would fall below the guideline levels set out in the BRE Guidance. However, officers consider this to be acceptable in this case, due to the existing context and conditions, which is a tight-knit urban grain, with many courtyard facing windows. The existing building is being largely retained and reused as a form

of housing, which is a planning merit given a great level of weight by officers, and due to this the opportunity to increase levels of daylight and sunlight to the building through orientation and positioning of windows is limited.

128. Officers therefore consider the proposed quality of accommodation to be acceptable, and in line with Policy H16 of the London Plan, and the LSPBSL LPG.

Affordable Housing

129. Policy H4 Delivering affordable housing sets a strategic target of 50% of all new homes to be delivered as genuinely affordable and requires major developments which trigger affordable housing requirements to provide affordable housing through the threshold approach (Policy H5 Threshold approach to applications).

130. Policy H5 *Threshold approach to applications* of the London Plan sets the initial threshold level of affordable housing on gross residential development at 35% to be delivered as affordable housing.

131. This requires detailed supporting viability evidence to be submitted in a standardised and accessible format as part of the application:
1) the borough, and where relevant the Mayor, should scrutinise the viability information to ascertain the maximum level of affordable housing using the methodology and assumptions set out in this Plan and the Affordable Housing and Viability SPG
2) viability tested schemes will be subject to:
a) an Early Stage Viability Review if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough)
b) a Late Stage Viability Review which is triggered when 75 per cent of the units in a scheme are sold or let (or a period agreed by the borough)
c) Mid Term Reviews prior to implementation of phases for larger phased schemes.

132. Where a viability assessment is required to ascertain the maximum level of affordable housing deliverable on a scheme, the assessment should be treated transparently and undertaken in line with the Mayor's Affordable Housing and Viability SPG.

133. LSPBSL generally provides accommodation for single-person households who cannot, or choose not to, live in self-contained homes or HMOs. This accommodation type may be used on a transitional basis until residents find

suitable longer-term housing. Whilst LSPBSL provides an additional housing option for some people, due to the unique offer of this accommodation type it does not meet minimum housing standards and is therefore not considered to meet the ongoing needs of households in London.

134. For this reason, LSPBSL cannot be considered an affordable housing product. It does not provide accommodation suitable for households in need of genuinely affordable housing, including families.

135. Parts (9) and (10) of London Plan Policy H16 therefore require development to:
9) deliver a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should seek this contribution for the provision of new C3 off-site affordable housing as either an: a) upfront cash in lieu payment to the local authority, or b) in perpetuity annual payment to the local authority.
10) In both cases developments are expected to provide a contribution that is equivalent to 35 per cent of the units to be provided at a discount of 50 per cent of the market rent. All large-scale purpose-built shared living schemes will be subject to the Viability Tested Route set out in Policy H5 Threshold approach to applications.

136. In Line with Policy H5 and H16, the applicant has submitted a Payment in Lieu of Affordable Housing letter (DS2, November 2023). The Proposed Development is for the change of use of existing offices with extensions to provide 174 co-living units with ancillary amenity spaces over basement and ten storeys at ground level and above.

137. DS2 have undertaken an appraisal of the Proposed Development assuming 35% of shared-living units are provided as affordable and a second appraisal assuming that 100% of units are provided as private housing. They have arrived at a calculation of the £5.9 million payment in lieu of affordable housing provision by deducting one residual value away from the other.

138. In order to determine whether a scheme is viable with a given percentage of affordable housing, alongside other planning obligations and community benefits, the key question is whether the residual land value is sufficient to incentivise the landowner to bring the site forward for development. The Planning Practice Guidance (‘PPG’) indicates that a ‘benchmark land value’ should be established on the basis of the existing use value of a site plus a premium for the landowner. The premium should “provide a reasonable incentive, in comparison with other options available, for the landowner to sell the land for development while allowing a sufficient contribution to fully comply with policy requirements”.

139. The PPG recognises that landowners may also be able to develop their land for an alternative type of development to that proposed in their application. As an alternative to existing use value, paragraph 017 of the PPG indicates that benchmark land value may be informed by the values generated by alternative uses, providing that the alternative scheme would "fully comply with up to date development plan policies…. and… it can be demonstrated there is market demand for that use".

140. Furthermore, if an alternative use value approach is adopted, the PPG indicates that "AUV includes the premium to the landowner. If evidence of AUV is being considered the premium to the landowner must not be double counted".

141. The City sought an independent review of the appraisals, and BNP Paribas carried this out.

142. The exercise carried out by the applicant and BNP differs from the methodology above, as the purpose of the calculation is to identify the uplift in value to the Applicant that would result from not providing 35% affordable housing on-site. Rather than comparing the residual land value generated by the Proposed Development to an existing use value, it is compared instead to a 'counterfactual' scheme, which provides affordable housing onsite. The payment in lieu equates to the difference between the two residual land values.

143. DS2's initial appraisal report (November 2023) indicates that the Proposed Development generates a payment in lieu equating to £5.9 million. DS2 arrive at this payment in lieu by deducting the residual value generated by the Proposed Development (assuming 100% private housing) from a residual appraisal assuming a notional provision of 35% of units at 50% discounts to market rent.

144. BNP have stated in their review (March 2024) that the approach DS2 have adopted is consistent with guidance and practice for the purposes of calculating payments in lieu of affordable housing. BNP identified some issues with the inputs into DS2's appraisals, including the projected rents, co-living operating costs and removed irrecoverable VAT from the equation. As a result of changing these inputs, BNP's independent assessment indicated that the payment in lieu should increase to £13.59 million.

145. DS2 responded with a letter (17 May 2024). In this letter they noted that BNP's appraisals were structured with a residualised 'output' rather than as a residual land valuations, which resulted in no finance costs being applied to land value. BNP in their response letter dated 7 June 2024 agree that this

was at odds with the methodology outlined in the City's Planning Obligations SPD, so have restructured their appraisals to generate residual land values.

146. The higher weekly rents projected by BNP in their review, which increases co-living market rents from £475 to £525 per week has been accepted by the applicant team and applied in an amended appraisal. The applicant has also accepted the removal of the irrecoverable VAT. As a result of BNP's restructured appraisal and including the amended operating costs and assumed market rents the payment in lieu represents the difference between the two residual values, being £8,510,568.

147. The applicant has agreed to pay this sum, which reflects the full financial equivalent of provision of 35% affordable housing in accordance with London Plan policy H16. This figure is arrived at by deducting the residual value of the scheme with 35% affordable housing (£7,009,906) from the residual value of the scheme delivered as 100% private housing (£15,520,474). It will be secured through the Section 106 Agreement as an up-front payment. In light of the proposed affordable housing payment, the proposal is considered to comply with Policy H16 of the London Plan, with regard to affordable housing.

148. An Early Stage Viability Review, if an agreed level of progress on implementation is not made within two years of the permission being granted. A Late-Stage Review is not required, as a payment in lieu equivalent to 35% affordable housing would be provided in line with Policy H5 of the London Plan.

149. The proposal would provide 174 co-living housing units (equivalent to 97 conventional housing units), which contributes to the City of London's annual housing targets, within a largely retained existing building. A significant sum would be secured in lieu of provision of affordable housing on site to be put towards City led (or involved) affordable housing schemes off-site, and these are planning merits to which a high level of weight is given by officers.

Principle of development conclusion

150. Considering the location, the loss of this office use (Class E) is not considered to prejudice the primary business function of the City, nor would it jeopardise the future assembly and delivery of large office development sites; or introduce uses that adversely affect the existing beneficial mix of commercial uses. It has been demonstrated that the continued use of the building as an office is not viable, and therefore the proposed change of use is acceptable in principle, in line with Policy DM1.1.

151. As this is a residential location, the site is suitable for the proposed co-living use (Sui Generis) in principle, in line with Policy DM21.1. The scheme would contribute to The City's housing targets (equivalent to 97 conventional housing units) and housing choice for Londoners. It has been through viability testing in line with London Plan Policy H5 and H16, to determine the appropriate financial sum to be provided in lieu of affordable housing on site, and £8,510,568 would be secured if planning permission is granted, in line with Policy H5 and H16 of the London Plan.

152. Despite some shortfalls in the provision of daylight and sunlight to the proposed scheme compared to the BRE guidance, officers consider the proposed quality of private accommodation and communal co-living facilities to be acceptable and of a good quality, they would provide residents adequate facilities for sleeping, eating, working, relaxing and storage to future residents, in line with Policy H16 of the London Plan.

153. Subject to assessment of the following matters, the proposal is acceptable in principle.

Sustainability

Circular Economy

154. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2 set out the City's support for circular economy principles.

155. The existing 45 Beech Street site comprises a part 6-part-8 storey building constructed in 1956. The building was originally constructed with a stone facade and inset spandrel bands of rendered concrete and ribbon glazing, which was replaced approximately 22 years ago. The building's structure is formed of a reinforced concrete basement and ground floor slab. The superstructure is formed of a steel frame encased in concrete. The floor slabs are concrete ribs with hollowpot infill. There is a lower ground floor which is accessed via an external ramp that curves inside the privately owned courtyard. Structural slab to structural slab level heights vary on each floor, ranging from 2.23m to 2.94m.

156. In assessing the existing building's suitability for the proposed uses, several factors have been considered. These include the lack of demand for office space at 45 Beech Street in its current form, and the unsuitability of the

existing floor-to-ceiling heights on the 5th, 6th and 7th floors which do not meet the 2.5m minimum headroom requirement for residential units.

157. A pre-demolition audit was undertaken which included the consideration of major refurbishment, and major refurbishment with extension. Although the option of a minor refurbishment for co-living residential use (Option 1) was also explored at an early stage, the aforementioned constraints relating to ceiling heights, in addition to poor facade and M&E performance meant that this option was discarded at an early stage. The option of a total demolition and new build (Option 4) for co-living residential use was also discarded at an early stage due to the high levels of carbon emissions associated with demolition and the sourcing of new materials, in addition to the opportunities that exist for the retention of various elements of the existing building. As such, the focus of the optioneering exercise centred on the following options which both of which proposed the conversion of the building for co-living residential use:
    - Option 2: Major refurbishment, 100% of substructure, 100% of superstructure, and 38% of facades retained.

    - Option 3: Major refurbishment with extension to upper floors, 90% of substructure, 66% of superstructure and 0% of facades retained.

158. Option 2 would not involve much demolition and would comprise a retrofit with partial retention of the existing facades. However, it would not address the main shortcomings of the building including its failure to meet minimum headroom requirements, poor thermal performance, and non-compliant staircases.

159. Option 3 would involve a retention of the structure up to the existing 5th floor, the demolition of the existing 6th and 7th floors, and an extension of the building by an additional two storeys. New high-performance facades would be introduced, in addition to new lift and stairs to meet current building standards. This option would address existing compliance and regulation issues whilst improving the thermal performance of the building ensuring its suitability for residential uses. As such, this option has been chosen for the planning submission.

160. The submitted Circular Economy Statement describes the strategic approach to incorporating circularity principles and actions into the chosen option, in accordance with the GLA Circular Economy Guidance. The statement includes details to support the reuse of existing materials, in addition to identifying an efficient materials strategy for all new elements, to include:
    - Retention of 90% of the substructure (by mass), 66% of the superstructure (by mass), and 0% of the façade (by m2). New facades are considered to be essential to improve the building's energy conservation standards and thermal efficiency which are underperforming.
    - Identification of reuse opportunities for deconstruction materials in accordance with the value retention hierarchy.

- Adoption of the GLA Building in Layers strategy with associated features such as a unitised façade system to enable replaceability and disassembly throughout the lifetime of the building.
- The exploration of material exchange platforms as an option for donating or selling materials.
- The re-use of re-purposed stone from the cladding of the existing building to create planters and seating.

161. A pre-demolition audit has been undertaken identifying the types and quantities of key materials present in the existing building whilst exploring on-site and off-site opportunities for reuse and recycling. This includes confirmation of a commitment to achieving key GLA targets including the re-use and recycling of 95% of non-contaminated construction and demolition waste, a minimum of 20% of the building materials to be comprised of reused or recycled content, and a minimum of 65% recycling rate for operational waste by 2030.

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

Operational energy strategy and carbon emissions

163. The Energy Statement accompanying the planning application demonstrates that the proposed development has been designed to achieve a site-wide overall 12% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building.

164. Energy demand and the risk of overheating would be reduced by including the following design measures:
    - Naturally ventilated co-living studios featuring openable windows to increase occupant comfort.
    - Efficient lighting and dimming to reduce internal gain.
    - High solar control glazing to reduce solar gains in addition to external shading in the form of a canopy at the top floor
    - Mechanical Ventilation Hear Recovery (MVHR) units to reduce cooling demand.
    - Efficient building envelope, enhanced fabric airtightness to reduce heating demand and infiltration heat losses.

165. The site is located within close proximity to an existing district heat network. Confirmation has been provided of the network's ability to accommodate the development's peak heating and cooling loads and as such the building will be connected to provide space heating, cooling and domestic hot water.

166. Low and renewable energy technologies are proposed to the development and comprise of a rooftop mounted PV array of 35sqm which would provide renewable energy.

Energy use intensity (EUI)

167. It is noteworthy to mention that the GLA does not currently provide carbon emissions targets and benchmarks specific to co-living spaces. As such in relation to EUI and space heating demand, the proposed development is assessed in relation to the requirements for all other non-residential developments as outlined in 7.13 of the GLA Energy Assessment Guidance.

168. In regard to carbon emissions savings beyond Part L, the scheme is assessed in accordance with the targets for non-residential development in accordance with 9.2.7 of the London Plan 2021.

169. The adopted GLA Energy Assessment Guidance (2022) requires developments to calculate the EUI, a measure of total energy consumed in a building annually including both regulated and unregulated energy, as well as the space heating demand. For all other non-residential buildings, the GLA targets an ambitious EUI of 55 kWh/m2(GIA)/year and a space heating demand of 15 kWh/m2(GIA)/year. The estimated EUI from the proposed development is 41.1kWh/m2/year inclusive of a space heating demand of 10.4 kWh/m2/year. These values are based on speculative allowances that will be reviewed in further detail to provide more accurate estimations in the next stages.

170. The site-wide energy strategy does not meet the London Plan target of 35% carbon emission savings compared to a Part L 2021 compliant scheme. Often a sizable reduction in carbon emissions is seen at the Be Clean stage where the actual efficiency of the proposed energy systems is compared to those used for the notional building. However, since the development will be connected to an existing heat network that is currently only partially decarbonised (with a decarbonisation plan in place), the benefit of connecting to a heat network is not properly captured since the notional and proposed buildings are assessed with the same system emissions and primary energy factors, in accordance with the NCM and GLA energy modelling guidance. As such, notwithstanding the merits of the heat network connection, the carbon emission reductions at Be Clean stage are shown as 0%. The proposed PV array would generate 1,994kWh of electricity annually which would result in a carbon emission saving of 0.1 tCO2/year equivalent to a saving of 0.2% which is rounded down to 0% in the GLA's reporting spreadsheet.

171. A Section 106 obligation will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

BREEAM and other certifications

172. A BREEAM New Construction 2018 pre-assessments has been undertaken for the development targeting a rating of 'Excellent' with a potential for 'Outstanding'.

173. The pre-assessments are on track to achieve a high number of credits in the City of London's priority categories of Energy, Water, Pollution and Materials as well as the Climate Adaptation credit Wst05 in the Waste category.

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

175. The scheme seeks to achieve an EPC rating of A.

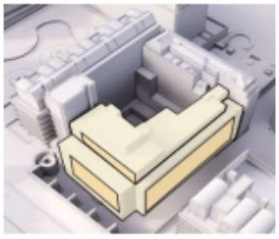
Whole life cycle carbon emissions

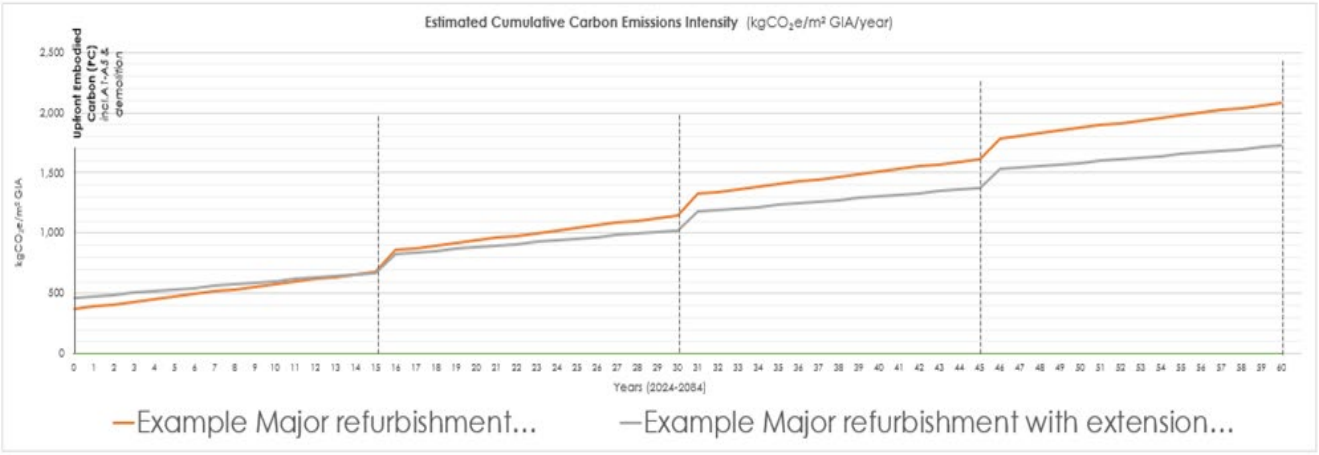
176. London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product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

<u>Carbon Options</u>

177. The following options were chosen as described in the Circular Economy section to be fully assessed and evaluated:
    - Option 2: Major refurbishment, 100% of substructure, 100% of superstructure, and 38% of facades retained.
    - Option 3: Major refurbishment with extension to upper floors, 90% of substructure, 66% of superstructure and 0% of facades retained, and the demolition of the existing 6th and 7th floor and the addition of 2 additional floors.

178. The following table and graph present the whole life-cycle carbon results from the 2 options:

Applicable	Option 2	Option 3
	Major refurbishment	Major refurbishment with extension
Photo		
Project reference period	60	60
Gross Internal area (GIA) m²	4,383	7,175
Net Internal area (NIA) m²	2,773	4,103
Change in NIA (compared to existing) m²	0	1,330
Substructure % retained by mass	100	90
Superstructure (Frame, Upper floors, Roof, Stairs and ramps) **% retained by mass**	100	66
Superstructure (External walls, Windows and External doors) **% retained by area**	38	0
Existing Building Demolition & Deconstruction (C1) ($kgCO_2e/m^2$ GIA)	0	0.32
Upfront Embodied Carbon (A1-A5) excl. sequestration ($kgCO_2e/m^2$ GIA)	370	464
In-use & End of Life Embodied Carbon (B-C) excl. B6 & B7($kgCO_2e/m^2$ GIA)	463	420
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) ($kgCO_2e/m^2$ GIA)	**833**	**884**
Estimated Whole Building Operational Energy (kWh/m² GIA per year)	151	101



179. The results show that, based on new building services installations, both options' carbon emissions rise at a similar rate throughout a 60-year life cycle, and that the upfront and whole life-cycle carbon impact is higher with more

new build quantity (Option 3). Qualitatively, the options can be assessed as follows:

180. Though the retention of 100% of the existing superstructure proposed by Option 2 would help to contribute to a lower upfront carbon impact, the existing low slab heights and varying floor to ceiling heights from level 05 upwards would not be able to provide the minimum headroom requirements for residential use. Similarly, although the partial façade retention would include some improvements to operational energy performance through replacement glazing, the proposed replacement and instatement of continuous thermal insulation proposed under Option 3 would provide improved long-term operational energy performance and would ensure the suitability of the site for residential use.

181. The GLA does not currently provide Whole-Life-Cycle Carbon benchmarks specific to co-living spaces and as such the scheme has been assessed in relation to the requirements for *residential developments* which constitutes the most similar profile.

182. The application proposal: The submitted whole life-cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table below. The results show that the A-C (excluding B6 - B7) whole life-cycle emissions would meet the GLA standard.

183. Carbon reduction measures incorporated to reduce the amount of embodied carbon resulting from the proposed scheme include the retention of the existing structure up to the sixth floor which significantly minimises the need for additional materials and construction processes, and an emphasis on the reuse and enhancement of existing/demolished material to incorporate circularity and therefore reduce carbon demand. Additionally, accommodation will be comprised of shower en-suites to enable the incorporation of prefabricated bathroom pods. Whilst wastewater-heat recovery (WWHR) has been considered, constraints related to the irregular stacking of bathrooms and inconsistent riser access and ceiling voids limit its overall feasibility.

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

Scope	**Proposed Development**	**Benchmark**	**GLA Benchmark**
RICS components	KgCO2/m2	KgCO2/m2	
A1-A5	690.5	< 850	GLA Benchmark

		< 500	GLA Aspirational
B-C (excluding B6 & B7)	359.9	< 350	GLA Benchmark
		< 300	GLA Aspirational
A-C (excluding B6 & B7)	1023.5	< 1200	GLA Benchmark
		< 800	GLA Aspirational
B6 + B7	712.103	N/A	N/A

185. These figures would result in overall whole life-cycle carbon emissions of 11,996,542 kg CO2e being emitted over a 60-year period. Of this figure, the operational carbon emissions would account for 4,922,059 kgCO2e (41% of the building's whole life-cycle), and the embodied carbon emissions for 7,074,484 tCO2e (58.9% of the building's whole life-cycle carbon). The embodied carbon from the substructure contributes 1% to the total embodied carbon and consists of enhancements to the existing foundations, while the superstructure accounts for 42.3% of the total. Building services would contribute to 28.3% of total embodied carbon emissions, whilst finishes, fittings, furnishings and equipment would contribute 24%.

186. It is noteworthy to highlight that the operational carbon figures provided are based on Building Regulations UK Part L (BRUKL) figures and therefore do not demonstrate compliance with the GLA guidance which requires figures to be provided based on TM54 modelling. Whilst the BRUKL figures provide estimates of both regulated and unregulated energy use, they are based on standardised profiles and usage patterns from the compliance methodology rather than the expected use of the actual building and do not include elements such as lifts, external lighting etc. However, the operational carbon figures provided are considered to be in line with those seen across other major refurbishment schemes of a similar profile. Nevertheless, updated figures based on TM54 modelling undertaken at the detailed design stage will be secured by condition to provide a more accurate outlook and to ensure accordance with GLA guidance.

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

Urban Greening

188. London Plan Policy G5 (Urban Greening) sets out the requirement for major developments to contribute to the greening of London through urban greening

as part of the design and site. An Urban Greening Factor of 0.4 is recommended for predominantly residential developments. Draft City Plan 2040 policy OS2 (City Greening) mirrors these requirements and requires the highest levels of greening in line with good design and site context.

189. The scheme seeks to maximise urban greening potential within the parameters of the development. The landscape proposals include diverse, low-level perennial planting interspersed across the scheme, an extensive green roof combined with the PV system, new tree planting, and climbing plants on suitable structures.

190. The scheme would achieve a UGF of 0.22 which does not meet the London Plan minimum requirement. Consideration is afforded to the existing hard standing and urban context of the site within which opportunities for extensive greening are limited by space and access constraints, and servicing and vehicle requirements.

Biodiversity Net Gain

191. As the existing site is a zero-baseline site (i.e. has no vegetative habitats over the minimum mappable unit), it is acknowledged that the 10% BNG requirement is not mandatory.

192. Nevertheless, the BNG Metric has been applied as a demonstration tool to calculate the biodiversity units generated by the proposed landscape and shows that the soft landscaping proposals on the site have the potential to generate a 0.11 unit gain in biodiversity gain.

Overheating

193. To address urban heat island risks, the proposed development includes an approach designed around passive measures and limiting internal heat gains to minimise the need for cooling. This includes the use of naturally ventilation in co-living spaces with dedicated MVHR units, in addition to having radiant panels that can provide cooling in the summer. Openable windows are provided to increase occupants' comfort within these spaces.

Flooding

194. The site is located within Flood Zone 1 - land assessed as having a less than 1 in 1000 annual probability of river or sea flooding (< 0.1%). The following measures have been considered to reduce the food risk to the site:
    - Non-return valves will be implemented on the final drainage run to the outfall connection to prevent a sewer surcharge from causing flooding.
    - Surface Water discharge rates will be improved from existing to reduce the volume of water entering the Thames Water sewage system.
    - Pumping of surface water to prevent backflow into the basement from the combined public sewer in the event of a surcharge. Subject to CCTV confirmation of levels.

195. A large portion of the roof would be provided as a green / blue roof, which would capture surface water at source and reduce the peak runoff from the development, rainwater harvesting is proposed for irrigation purposes. There is an attenuation tank within the existing basement reducing flow within the blue roof system that provides 23m3 and 7m3 of attenuation respectively.

Water stress

196. Efficient water consumption through the specification of efficient fittings, sanitaryware and appliances will be maximised to target a minimum 40% improvement against the BREEAM baseline performance. The drainage strategy includes the incorporation of a blue-green roof with permeable paving to allow for attenuation via a cascading system which will drain into the attenuation tank. The attenuation tank will be sat above the basement slab level and will store water temporarily before controlled discharge via a pump into the Thames Water Network along Bridgewater Street.

Conclusion on sustainability

197. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing. The Local Plan policies require redevelopment to demonstrate highest feasible and viable sustainability standards in the design, construction, operation and end of life phases of development as well as minimising waste, incorporating climate change adaption measures, urban greening and promoting biodiversity and minimising waste.

198. The proposed development would deliver a high quality, energy efficient development that is on track to achieve an “Excellent” BREEAM assessment rating, in overall compliance with London Plan policy SI 2, Local Plan policy CS15 and DM 15.5 as well as Draft City Plan 2040 policy DE1. The proposals initially cannot meet the London Plan target of 35% carbon emission savings compared to a Part L 2021 compliant scheme due to the proposed connection to the local heat network, however, the demonstrated high energy efficiency and the anticipated decarbonisation of the heat network and increasing heat network efficiency would reduce the carbon emissions associated with energy use as heat networks develop to supply heat and coolth in the most efficient way...

199. The assessment of options, carried out in compliance with the Carbon Options Guidance 2023, confirmed that although the preferred proposal would result in the highest whole life-cycle carbon emissions out of the 2 options, none of the other options would be able to deliver the holistic sustainability benefits that would complement the re-development of the site into a scheme according with the residential context of the immediate surrounding area. Opportunities to minimise the demolition of the existing building and maximise the reuse of deconstruction materials from the site have been identified to mitigate impacts of redevelopment. These include the retention of 90% of the substructure and 66 % of the superstructure, in addition to the re-use of re-purposed stone from the cladding of the existing building to create planters and seating. The proposal therefore would satisfy the GLA's circular economy principles and London Plan policy SI 7, Local Plan policy CS15 and DM17.2, and Draft City Plan 2040 policy CE1. The building design responds well to climate change resilience by implementing natural ventilation to respond to overheating risks, saving water resources and various opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Page 97 Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and Draft City Plan 2040 polices S14, OS1, OS2, OS3, S15, CR1, CR3.

Architecture, Urban Design and Public Realm

Policy Context

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

The Existing Site and Surrounding Townscape Context

201. 45 Beech Street is a commercial building, on the northern side of Beech Street accessed from the Beech Street tunnel. While not located within a Conservation Area, the site is located on the northern boundary of the Barbican Estate which is a designated Conservation Area, Listed Building and Registered Park and Garden. The existing building is L-shape in plan with a bird-mouth corner to the southeastern corner and is set over eight stories plus plant reaching +46.6m AOD. The body of the building formed of six storeys

(+36.6m AOD) with addition of two storeys (+42.4mAOD) to the south and one storey (+39.7mAOD) to the north set back from primary building line.

202. The building was constructed in 1956, formally known as Murray House, by Frank Scarlett, prior to the construction of the Barbican Estate which now surrounds it to the east, south and west. To the south the building relates both to the vehicular tunnel along Beech Street, and above to the Barbican Podium gardens. The lower level is particularly hostile, with the building entrance being located within the tunnel. There is a lightwell between the southern elevation and the Barbican Podium which enables daylight to reach the building entrance, creating a brief moment of relief within Beech Street tunnel. The ground floor condition is nevertheless highly compromised by the construction of the tunnel which has created a poor pedestrian environment. The dimensions of this lightwell and the alignment with the podium are also not completely parallel, which means that the southern elevation of the building does not align seamlessly with the podium or the two Barbican blocks which flank it to the east and west, Ben Johnson House, and Bryer Court, respectively. Resulting in the blank southwestern side elevation of the building being visible in views from the Barbican podium. When experienced at the higher Barbican podium level, 45 Beech Street is noticeably distinct from its context of the Barbican Estate due to its smaller scale, contrasting materiality (Portland stone), architectural aesthetic, albeit designed in a modernist architectural style and orientation.

203. The primary frontages of 45 Beech Street are to the South and East, at ground floor these are formed of large, glazed openings with Portland Stone columns and a dark stone base, the primary entrance is located in the middle of the southern façade, which is accessed via a number of steps. Step free access is provided via a ramp and entirely separate entrance door to the West. Neither the southern or eastern ground floor bays offer active engagement and visual interaction with the streets they address.

204. The body of the building addresses the Barbican Podium and the wider Barbican Estate. The façade to the South is characterised by a vertically orientated arrangement of square windows with rendered concrete spandrel panels beneath and concrete fins, set within a Portland Stone boarder, an architectural language which is continued along the southern façade of two storey setback floors, creating a sense of solidity and strength. The architectural treatment of the west end of the southern façade is articulated by rectangular windows set within Portland Stone. An architectural language which is also utilised on the return of the birds-mouth corner. The opposing corner of the birds-mouth is formed of Portland Stone and a decorative concrete mural at first floor. The eastern elevation is a simplified version of the southern elevation however with a stronger horizontal composition. The

setback floors of the eastern elevation are of poor quality and do not relate to the architectural language of the floors below. The existing roofscape is of poor quality and is cluttered by telecoms infrastructure.

205. Interior elevations, to the north and west, face onto an internal courtyard which is only visible from the public realm in fleeting views from the Barbican Podium under Bryer Court. The rear elevations are formed of white framed windows with a strong horizontal arrangement set within a rendered façade to the north and a red brick façade to the south. The internal courtyard is experienced as a harsh grey landscape, solely used for servicing, enabling access to the buildings lower-ground/basement of the building and a UKPN substation. The ground floors fronting onto the ramp are in poor condition and at present, the courtyard offers no amenity to office occupants.

206. To the north of the site is the narrow plot of Bridgewater House which forms the northern edge of the city block. Bridgewater House is formed of 7 storeys above ground and completes the eastern elevation of Bridgewater Street. The architectural language of Bridgewater House sits in contrast with the 45 Beech Street, with the body of the building formed of yellow brick with red brick detailing and brown framed windows to the primary frontages to the east and north. The northern façade fronts onto to the internal courtyard and is rendered white.

Proposal

207. The proposal is to extend and reclad the existing building and change its use from office to communal living with a public café on the ground floor.

Architecture and Urban Design

Bulk, Height and Massing:

208. The height, massing, and overall expression of the development has been carefully considered in relation to key townscape views, with particular attention to views experienced from within the Barbican Estate at Podium Level. These are discussed in the following section of this report.

209. The proposal would retain a significant proportion of the existing structure, and as such the building's plan form would predominantly follow the existing building lines. The greatest alterations to bulk and massing come from the upward extension at level 06 increasing the height of the building to +50.0m AOD. Where the existing terrace at level 06 on the south would be filled in, and the building shoulder height pulled up by two storeys reaching +44.0m

AOD, it would strike a comparative alignment with the two Barbican Blocks which flank the site on both sides. The top of the building is expressed by a series of arched roofs, which on the south are set back from the body of the building creating private terraces.

210. The total increase in the bulk and scale of the building would therefore be moderate and maintain its commensurate scale with the neighbouring Barbican blocks and Bridgewater House to the North.

Expression and Materiality:

211. Owing to the building's location between the Listed buildings, and Conservation area, the character and expression of the building has been designed to respond to the modernist aesthetic of the Barbican but be legibly different through its bay detailing and the overall pattern of fenestration and materiality. The building has been given a clear base, middle and top, elaborated upon below.

The Base

212. As stated previously, the base of the building is experienced from within the dark and hostile tunnel along Beech Street, and the narrow Bridgewater Street, the western elevation of which is dominated by the solid and inactive blue metal cladding of the back of the Barbican Exhibition Hall. The architecture of the base of the proposed building provides a unique opportunity to add visual interest and vibrancy to these underperforming areas of public realm and ensure the base of the building is legible and prominent on approach. The base would be expressed as a double order to the south to signify the primary entrance and a single storey to the east and are broken down into three bays to the south and four and half bays to the east, following the existing column rhythm. Colour, texture and depth would be used within these bays to create a more vibrant and dynamic ground floor below the Barbican Podium. The use of vibrant orange aluminium portal frame with orange glazed ceramic tiles all set within a highly aggregated GRC Frame would enliven the base of the building while respecting the sensitive heritage environment above. The majority of the ground floor bays would be clear glazed, to ensure views into and out of the ground floors, again adding animation to the streets. Further design development will be secured via condition to ensure an integrated and high-quality finish is achieved, through the use of lighting, colour and texture.

213. The secondary entrance into the building would be via the entrance gate access from Bridgewater Street. The decorative metal gate would be used by

both vehicles and pedestrians and would be designed to be both inclusive and welcoming. Further details would be secured via condition.

214. This approach of injecting moments of playful vibrancy to the base of the building would continue around onto the interior elevations of the courtyard. Here, the base of the building would be repainted in an orange colour to help inject life and vibrancy to what is currently a hostile, dark and unwelcoming space, helping to transform its character and supports its use as a meaningful area of external amenity space for building residents. The existing openings at ground floor level would be reduced in height to create a long horizontal slot window, and at lower ground floor level the addition of five oval windows to provide more light into the interior spaces, and additional animation to the courtyard.

215. The main entrance, like the existing building, would centred on the Beech Street elevation. The existing level change would be simplified by building up the internal levels to create one consistent internal floor level which would be navigated externally by either three steps or gentle slope located to the east of the main entrance, allowing level access through a single point of entry.

216. The proposed ground floor elevations would be transformed to be outward-facing and visually permeable, allowing passers-by to look into communal amenity spaces and proposed public café. The proposed addition of a café on the eastern corner would also increase animation and is a welcome addition to the proposal, details of which will be conditioned. Overall, officers consider that the proposal's adaptations to the ground floors would provide greater animation and enhance the quality of the surrounding streets and significantly improve the design quality of the base of the building. A condition will be applied to the application to ensure the glazing remains clear and transparent to enable views into the base of the building.

The Middle

217. The south and east elevations follow the same design principles as each other and are broken down into bays which continue the rhythm up from the base below. The bays would be framed by a panellised sandy coloured textured GRC with exposed fine aggregates as below. The repeating bays are formed of a horizontally arranged double window module, set within white tiles and divided down the centre by white tiled pier. The square window module would be formed of a vertically ribbed dark metal spandrel panel to the base of the window and an openable decorative panel to one third of the module. The window module has been designed to maximize the natural light, prevent overheating and provide natural ventilation. The windows have been set into the façade by 365mm providing increased depth to the façade

creating natural solar shading and creating a more dynamic façade treatment which varies when viewed from oblique angles.

218. The birds-mouth corner which connects the primary elevations, is a moment of calm relief and solidity, is formed of GRC panels which are punctured with oval windows to the east elevation, which take inspiration from the surrounding Barbican context, where similar oval proportions are found at the top of the Barbican Towers.

219. The internal elevations would be rationalised and a consistent language across both elevations would be introduced. The windows would be arranged in horizontal grouping made up of fixed and openable windows and bright coloured spandrel panels. The windows have been enlarged to maximise levels of natural light within the courtyard facing rooms, and openable panels have been included within every room to allow for natural ventilation. The openable elements would be mirrored on each floor creating variation as you move up the façade. Both internal facades would rendered in a light colour, creating an air of lightness and neutral materiality to the façade composition, to match the rear façade of Bridgewater House.

The Top

220. The top of the building is expressed through a series of repeating double height arched bays. The south elevation is formed of four equally bays while the east elevations are not equally spaced, with two wider bays to the south and two one-storey bays to the north sandwiching the five equal bays. The arches along the southern elevations have deep reveals, clad in zinc, which create natural subdivision of the balconies associated with those rooms, as well as providing natural solar shading and the concealed integration of downpipes. Each arch would be subdivided by asymmetrical rectangular white porcelain tiled panels and glazed opening, divided by projecting aluminium frames finished to a ‘Architectural Bronze’ colour. The soffit of the arch would be decorated with white metal batons to inflect additional visual interest. The variations in the materiality would add texture and complexity to the roofscape creating a positive sense of differentiation between 45 Beech Street and the surrounding Barbican Blocks, which are cast in white painted concrete.

221. Along Bridgewater Street the architectural treatment of the arches would follow the same design principles as those on the south, however, the reveals would be reduced, and no balconies would be provided on the eastern elevation. The single-storey arches to the north end of the elevation would form the balustrading to the communal amenity behind and have a different

architectural language incorporating back painted glazing with vertical metal detailing.

222. Finally, the top floor has been designed to incorporate biodiverse green roofs, PV panels, plant equipment, all of which would be set back significantly from the south and east elevations ensuring it would have no visual impact from the Barbican Podium. A 1.1m high lightweight maintenance railing would run around the western edge of the roof and would not be visible from the public realm. As the roofscape would be visible from surrounding high-level windows, further details are required to ensure the building's roofscape is of high quality.

223. A number of objections have been raised on the design of the proposed roofscape and its apparent similarity to the Barbican blocks adjacent. Discussions on the comparative similarity and difference, and the implications of these are discussed within the assessment of indirect heritage impacts below.

Outdoor Amenity and Landscape Design

224. Three different outdoor amenity spaces are proposed at 45 Beech Street, with the primary communal amenity space located at roof level 09, the secondary amenity space located within the internal courtyard and private balconies located at level 08 along the southern elevation.

225. The level 09 terrace would be located at the end of communal corridor to the northern end of the building and would provide an intimate elevated terrace for the use of the co-living tenants. The space would incorporate planters, fixed and unfixed furniture to create a flexible space while ensuring inclusivity and safety. Planters would run around the edge of the level 09 terrace behind the balustrading creating a planted edge to the terrace providing an integrated buffer to the building edge, creating a natural deterrent. The terrace layout and balustrading would be designed in line with the City of London Corporation Preventing Suicides in High Rise Buildings and Structures planning advice note. Further detail regarding suicide prevention, inclusivity and landscaping would be secured via condition.

226. The internal courtyard is currently dominated by the existing vehicular ramp, a substation and black metal infrastructure which provide means of escape from surrounding buildings. The proposals aim to work with this constrained environment to provide a unique amenity space for the building occupiers. Alongside the architectural interventions mentioned previously the proposal would introduce natural materials, such as clay bricks for paving, planters, terracing and seating, shade tolerant planting, mirrored screening, and bright

coloured paint to the existing metal infrastructure. Creating an informal amenity space within this currently underutilised space which would have level access from the laundry room and cycle store. Making the internal courtyard a good location for the building occupants to sit and relax as well as dry laundry and fix their bikes.

227. At level 08 the massing is set back from the building edge creating five balconies along the south elevation. These would form private amenities for five of the South facing rooms on level 08. The planters would be arranged on the outside edge of the metal balustrading creating a soft green planted edge.

228. Notwithstanding the approved drawings, the final details of the landscaping including full planting specification, hard and soft materials, furniture, maintenance regime, and irrigation, in accordance with the City of London Techincal Toolkit, will be conditioned to ensure the design and materials are of high quality, so the landscape thrives and is of acceptable design quality, and is fully inclusive.

229. Appropriate lighting, in accordance with Local Plan Policy DM 10.1, would deliver a sensitive and coordinated lighting strategy integrated into the overall design, minimising light pollution, respecting the historic context, responding to public safety and enhancing the unique character of the City by night. Irrespective of the approved drawings, a detailed Lighting Strategy would be subject to condition to ensure final detail, including from, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with guidance in the City Lighting Strategy. The proposed public realm lighting strategy would provide low level illumination to architectural and landscape features, to enhance the pedestrian experience and improve safety.

Conclusion on Architecture and Public Realm Design

230. Officers consider that the architectural design of the building would be compatible with the existing context in terms of scale and massing and be read as a well-layered piece of design, which would improve the building's contribution to the local townscape. The ground floors would also be transformed to be outward-facing and visually permeable, encouraging a positive interaction with surrounding streets. Similarly, the proposals would enhance the landscaping within the site, providing richer planting and greater opportunities for sitting and external amenities. The proposals would particularly enhance the overall quality and character of the internal courtyard

and public realm along Beech Street, which is currently hostile and underutilised.

231. The proposals would comply with Local Plan Policies CS10 and DM10.1, Draft City Plan Policy S8, DE2, HL1, and London Plan Policy D3, and paragraphs 135 and 137 of the NPPF.

232. Irrespective of the approved drawings, full details of the ground floor frontages, typical bays, and way-finding strategy are reserved for condition to ensure these are well-detailed and are useable. The development has had regard for Local Plan Policy DM 3.2 and the Mayors Public London Charter promoting a safe, inclusive and welcoming environment.

Heritage and Strategic Views

London View Management Framework (LVMF) and City of London Strategic views

233. For completeness, the proposal has been considered in relation to the LVMF and other Strategic Views (including the World Heritage Site). The proposal's small scale, dense urban location and distance from the WHS means that it would not appear in any of these views and therefore the relevant policies in the London and Local Plans would not be triggered.

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

Designated Heritage Assets - Direct Impact

235. The building is not listed or located within a Conservation Area. An assessment as to whether it is considered a non-designated heritage asset is set out below.

Non-designated heritage assets

236. Non-designated heritage assets (NDHAs) are defined in National Planning Policy Guidance (NPPG, para 039) as 'buildings, monuments, sites, pleases, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets'. Criteria for identification of sites as NDHAs are suggested in Historic England's Advice Note 7 (Local Heritage Listing). The criteria comprise: assets type; age; rarity; architectural and artistic interest; group value; archaeological interest; historic

interest; and landmark status. An assessment of the existing building against these criteria is made below.

237. In terms of asset type, age, rarity, as a purpose-built commercial building of the late 1950s, 45 Beech Street is an example of a mid-20th century (post-war WWII) commercial development in a vaguely modernist idiom. Such buildings are now comparatively rare in the City, though not nationally, so the building is considered to possess a degree of rarity at a local level.

238. Furthermore, the building's curious spatial relationship with the surrounding Barbican Estate is considered to hold a minor degree of historic interest by illustrating how the Estate's bold architectural ambition broke absolutely with the remnants of the existing historic street pattern and few preceding standing buildings, of which the application site was one.

239. However, the existing building is, through its modest scale and architectural anonymity, not considered to possess any group value with the buildings of the Estate; the building is not considered to hold any architectural qualities of note, being a simple exercise in masonry-faced, rectilinear elevations between unprepossessing base and roof treatments. As such, the building is not considered to possess architectural or artistic interest. The building is not considered to hold any archaeological interest of past human activity.

240. Finally, as a result of its encasement by the Barbican blocks, and the challenging relationship to Beech Street which makes the approach to the building underwhelming and difficult, officers conclude that the building cannot lay claim to any form of landmark status.

241. In conclusion, the building meets, to a very limited extent, two of the seven criteria suggested by Historic England for identifying non-designated heritage assets. On balance it is considered that the building does not possess enough heritage significance to warrant this status, and therefore its extensive refurbishment is not objectionable from a heritage perspective.

Designated Heritage Assets - Indirect Impact

<u>Registered Historic Park and Gardens:</u>

Barbican Estate Registered Historic Park and Garden (RPG) (Grade II)*

Significance:

242. The landscape of the Barbican Estate was conceived and designed as an integral part of the architectural design by Chamberlain, Powell and Bonn with the architects recognising that the spaces between the buildings were of equal importance to the structures themselves. The landscape is now designated as a grade II* Registered Historic Park and Garden (2003) and is one of only two post-war landscapes designated above Grade II within Greater London. Its heritage significance is derived from the following values:
    - The creation of the Barbican as a vehicle-free environment through the raising of the precinct above ground level on the podium, creating vehicle-free space the quality and quantity of which is unparalleled in London.
    - The raised ground of the podium and the highwalks as an intrinsic and distinctive feature of the estate. The raised ground provides viewpoints from which to survey the surrounding city below, and, together with the limited entrances to the complex at ground level, contributes to the conception of the Barbican as fortified structure from the surrounding streets.
    - The volume of space created by the concentration of built development in dense 'off-the ground' structures. These spatial reservoirs are recognised to be as significant as the buildings themselves.
    - The contrast of the planning of the Barbican with the grain and plan of the surrounding townscape, and the creation of characteristically unique dramatic vistas across the estate and into the surrounding townscape.
    - The richness and variety of types of external space across the estate delivered within a consistent design idiom, the scale of which is unique.
    - The successful designed relationships with 'found' historic elements including the Roman and Medieval wall, and the Church of St Giles Cripplegate and associated gravestones.
    - The urban character of the Barbican, and its conception and realisation as a new piece of urban fabric designed and delivered in its entirety by a single client and architect.
    - The consistent use of a small number of materials and detailing across the estate, delivering a powerful sense of visual continuity and consistency to the estate.
    - The impact of soft landscaping and the value of experiencing the architecture of the Barbican in the context of trees, foliage, and greenery. Originally this appears to have been intended to result from use of a restricted palette of planting in raised blocks of greenery or planter boxes which assumed an architectural significance in relation to the buildings. The layout established by Janet Jack across the upper podium employs a freer geometry and more varied planting palette.

Setting:

243. Due to the contained and raised nature of the Registered Historic Park and Garden, the primary setting of the landscaped gardens are the Estate buildings and historic elements within it. The enclosed nature and raised level separate the wider townscape adjacent to the Barbican, aside from glimpsed views between buildings from surrounding streets.

244. The setting of the northern boundary, relevant to this application, is highly enclosed, with 45 Beech street forming a prominent backdrop to the northern edge of the central avenue known as Beech Gardens, sitting as it does in between Barbican blocks, where both it's primary southern, and secondary eastern facades are experienced and enclose the edges of the gardens. The scale and location of 45 Beech Street means that it is highly visible, and of a height that contributes to the sense of enclosure and isolation which is characteristic of the Gardens. This northern edge is considered to make a neutral contribution to the setting of the Gardens because, while offering enclosure and being a well-established calm backdrop, 45 Beech Street is experienced as a disassociated built form - owing to its physical separation from the Podium - and contrasting appearance.

Impact

245. The proposals would have intervisibility with the landscape of the Barbican Podium from views within the Estate. The additional height and expression of the proposed development would result in a slight change to the setting. Comments have been received from The Gardens Trust contending that the proposals would be harmful to the heritage asset, however officers consider that the change to setting would not be counter to the prevailing characteristics of the northerly setting of the RPG, and would not detract from the qualities that underpin the significance of the Registered Historic Park and Garden. The proposal would preserve the setting and significance of this designated heritage asset.

<u>Listed Buildings:</u>

Barbican Estate (Grade II)

Significance:

246. The Barbican Estate, designed by Chamberlain, Powell and Bon, is a leading example of a modernist project in the high Brutalist style, and is perhaps the seminal example nationally of a comprehensively planned, post-war, mixed-use scheme. The Estate is a composition of towers and long slab blocks at raised podium level, separating pedestrians from vehicular traffic, which

enclose private and public landscaped open spaces centred on a canal in a Le Corbusian manner. It is of architectural interest for its compelling architectural narrative, which encapsulates the macro and micro design intent of the architects in a dramatic arrangement of buildings and spaces which are tied together by a consistent and well-detailed bush and pick-hammered finish. It is of historic interest as a modern exemplar of comprehensively planned high-density urban living during the postwar period delivering essential housing for the City of London, and for the associations with the architects.

Setting:

247. Overall, the Barbican Estate is appreciated as a standalone set-piece of architectural design and this is supported by the Listed Building Management Guidelines Volume II. There is little reliance on the wider surroundings to aid appreciation or an understanding of the Barbican's historic, architectural and artistic values. Exceptions to this are the Golden Lane Estate to the north and listed buildings to the south including St Giles Cripplegate and Ironmongers Livery Hall.

248. The Estate's setting varies greatly around its perimeter, where a varying range of mostly modern, large, and predominantly commercial buildings of differing materiality and composition, form a well-established neutral contribution to the Estate's setting and significance. Their scale and proximity reinforce the enclosure and segregation characteristic of the Barbican Estate, albeit in a neutral way unrelated to heritage significance. 45 Beech Street is one such building, however, due to its scale and embedded location amongst the Barbican, it has a more visibly acute and unique relationship with the Estate, since it forms part of its primary, inward-looking frontage. Despite this proximate physical relationship, and its solid modernist architectural expression, 45 Beech is not experienced and appreciated as a Barbican building. This is due to its smaller scale and slightly skewed alignment, which makes it subservient to the Barbican; its commercial use; and contrasting architectural expression and materiality.

249. As set out in the NDHA assessment above, there is a minor degree of interest in the relationship between 45 Beech Street and the Barbican, as a vestige of earlier, fledgling post-war commercial development ruthlessly encased by the groundbreaking Estate – elucidating the assertive modernist vision of the Barbican. However, notwithstanding this, it is considered that the architectural anonymity and small scale of the existing building means that, overall, its contribution to the setting of the listed building is neutral.

Impact:

250. The proposals would have a high degree of intervisibility with the Barbican Estate both from within its setting and from views within the Estate. As discussed above, the existing 45 Beech Street building forms a neutral part of the northern boundary to the Estate.

251. The proposals would result in a change to the setting of the Barbican in two ways. First, by virtue of the increased scale, which would rise to a similar height as the Barbican slab blocks, and second, because of the change in architectural expression which would, in places, reference some of the language of the Barbican – via material choice and some architectural devices. The proposed architectural language and expression of the development has been designed to sensitively respond to the Barbican Estate buildings, balancing the need to respond to the character and appearance of the buildings which form its immediate context, while also remaining distinct from them.

252. A key point of contention raised by objectors has been the application of barrel-vaulted roofs, which they consider to be an "inappropriate pastiche of the original Barbican estate". Officers come to a different view, considering that the design of the arched roofs – which have a noticeably different rhythm, scale, materiality, radius, depth and internal subdivision – would establish a positive sense of differentiation, adding interest to the roofline of the block, hierarchy to the building, and its overall quality. While officers recognise the importance of the Barbican's vaulted roofs to the architectural significance of the estate – of which it is one of a number of architectural signatures - officers do not consider that the proposals threaten or undermine the integrity of the Barbican blocks, the gravitas and interest of which could/would still be fully experienced and appreciated even in those instances where the two roof forms are seen alongside each other. Furthermore, at no point would the proposed roofs change the way the Barbican roofs are experienced as part of the whole Estate. Officers draw the same conclusion with respect to the design of the rest of the building, noting that while some of the architectural language is shared – namely though the strength of the concrete horizontal banding, and use of white tiled inset panels – there would still be palpable difference within the elevations and the application of materials and forms to ensure the 45 Beech street is not read and identified as a Barbican block, and instead as a modern addition to the townscape. Equally, the solidity which remains within the façade, and the overall balance of solid to void, ensures that the development would sit comfortably within the setting of the Barbican, and not be experienced as a starkly different or distracting presence.

253. Officers further consider that many of the defining features and design parameters which signify the historic relationship, such as the depth of the

set back and quirk of the skewed relationship to the podium, and the way that 45 Beech Street would still be seen and experienced coming to ground below the podium, would remain interpretable.

254. Overall, the development would not challenge or detract from the pioneering mid-20th century masterplan, architectural language or qualities which underpin the significance of the Barbican Estate and its existence as a distinct entity would remain appreciable. It is therefore considered that the proposals would preserve the setting and significance of the listed building.

Conservation Areas:

Barbican and Golden Lane Estates Conservation Area:

Significance:

255. The Barbican and Golden Lane Conservation Area Character Summary and Management Strategy SPD (2022) articulates the character, appearance and significance of the Conservation Area set out within six attributes identified within Section 1 ('Summary of Character, Appearance and Significance', pp.4), as follows:
    - Two estates which, together, provide a unique insight in the creative processes of a seminal English architectural practice, Chamberlin, Powell and Bon.
    - Integration of the ancient remains of the Roman and Medieval City wall, including Bastions 12, 13 and 14 and the medieval church of St Giles Cripplegate in a strikingly modern context.
    - In scope and extent, the estates are important visual evidence of the scale of devastation wrought by the World War 2 'Blitz' bombing campaign of 1940 –1941.
    - Seminal examples of ambitious post-war housing schemes incorporating radical, modern ideas of architecture and spatial planning reflecting the development of both Modernism and Brutalism.
    - Unprecedented and ingenious provision of open space and gardens within central London, which continue to be a defining characteristic of the estates today.
    - New and striking architectural idioms, particularly at the Barbican, applied on a significant scale; a new architectural language deliberately modern and forward looking; a way of planning and arranging buildings and spaces which was unprecedented in Britain and reflected evolving ideas of the modern city.
    - Overarchingly, the character, appearance and heritage significance of the conservation area can be summarised as the striking juxtaposition

between two seminal post-war housing Estates which illustrate evolving trends in architecture, spatial and urban planning and Modernism in general.

256. To summarise, the conservation area is defined by its pervasive modernity, by the consistency of modern forms, spaces and finishes throughout, all executed to a very high standard of quality and representing an immersive experience strikingly at odds with the more traditional townscapes and buildings outside the boundary.

Setting:

257. The wider setting of this large Conservation Area is informed by dense urban development, of a largely post-war, post-modernist and modern architectural character. The northern boundary abuts the London Borough of Islington, and this setting is typically lower rise with a mixture of modern and historic built fabric set out on a historic streetscape. Just outside of the Conservation Area boundary, 45 Beech street informs a small portion of the northern boundary in-between the Barbican and Golden Lane estates. To the east, there is again a mixed townscape around Moorgate, although largely comprised of large scale modern commercial buildings in the immediate vicinity of the Conservation Area – namely the redeveloped series of office blocks that were built along the road London Wall in the 1970s. To the south, the setting is principally formed by the main route of London Wall, former Museum and Ironmongers, and further large-scale modern commercial buildings. To the west, late 20th century, mid-rise commercial buildings line Aldersgate Street, largely obscuring the more historic areas of Smithfield Market and Charterhouse Square which are adjacent these have a neutral presence.

258. 45 Beech Street, located within the folds of the Conservation Areas' boundary, towards its geographic centre, is one of a number of large commercial buildings which form part of the established characteristics of the townscape surrounding the Conservation Area. On balance, the existing building is considered to make a neutral contribution to the setting of the Conservation area, since it gives definition to the boundary adding to the sense of isolation and singularity of the Barbican estate; it reinforces the striking juxtaposition of townscape character to its surroundings through the Barbicans grander scale and more assertive architectural style; but is not of appreciably high architectural quality.

259. As set out in the NDHA assessment above, there is a minor degree of interest in the relationship between 45 Beech Street and the Barbican, as a vestige of earlier, fledgling post-war commercial development ruthlessly encased by the groundbreaking Estate – elucidating the assertive modernist vision of the

Barbican. However, notwithstanding this, it is considered that the architectural anonymity and small scale of the existing building means that, overall, its contribution to the setting of the Conservation Area as a whole is neutral.

Impact:

260. The impact of the proposed development would be limited to experiences within and across the north/central boundary of the Conservation Area, particularly on the Barbican Podium with views looking north out of the Conservation Area, and east and west along the podiums Beech Gardens. The SPD notes that views out of the two estates, with glimpses of the surrounding City, are likely to change because the Conservation Area sits within the dynamic context of a densely developed urban centre. Furthermore, larger modern buildings are an established characteristic of the townscape surrounding the Conservation Area. In a similar vein to the conclusion on impact drawn for the Barbican as a listed building, officers consider that the proposals would have a neutral impact on the significance of the Conservation Area, since it marks only a small portion of the extensive and dynamic Conservation Area setting. The proposals would also continue to preserve the boundary and edge relationship to the Barbican, but slightly change the juxtaposition in architectural aesthetic. However, officers consider that despite this change, the significant qualities of the Conservation Area as set out above would remain appreciable.

261. Overall, the proposal would preserve the setting, significance, character and appearance of the conservation area.

262. There have been no objections from the LB Islington.

Other Designated Heritage Assets

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

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

265. In respect of other heritage assets, officers have scoped an extensive number. The definition of setting is the extent to which an asset is ‘experienced,’ which is not geographically set and can change over time,

relating to more than just a direct visual influence. Given the dense central London location, the site is within the setting of an enormous number of heritage assets, and it would be disproportionate to assess them all.

266. In particular, it is considered that the following were found to have no visual relationship with the proposal and therefore were scoped out of the assessment:
    - Golden Lane Estate Registered Historic Park and Garden (Grade II*)
    - Crescent House (Grade II*)
    - Cullum Welch House (Grade II)
    - Cuthbert Harrowing House (Grade II)
    - Bowater House (Grade II)
    - Great Arthur House (Grade II)
    - Golden Lane Community Centre (Grade II)
    - Bayer House (Grade II)
    - Stanley Cohen House (Grade II)
    - Golden Lane Estate Leisure Centre (Grade II)
    - Basterfield House (Grade II)
    - Hatfield House (Grade II)
    - Cripplegate Institute (Grade II)
    - The Jugged Hare Public House (Grade II)
    - Jewin Chapel – non designated heritage asset
    - Brewery Conservation Area
    - Smithfield Conservation Area
    - Chiswell Street Conservation Area

Impact on nearby Non-Designated Heritage Assets

267. An objection response has been received contending that Bridgewater House, adjoining 45 Beech Street to the north, should be considered a non-designated heritage asset and the impacts of the development be assessed as such.

268. While noting Bridgewater House's historic relationship with the development of Bridgwater Square C. 1920, officers disagree that the building is of sufficient architectural or artistic quality, rarity, age, historic or archaeological interest, landmark status or group value (as identified within the HE guidelines) to be considered a non-designated heritage asset. Furthermore, officers conclude that in urban design terms, the proposal would be a positive addition, and improvement upon the contribution of the existing building to the local townscape, by virtue of its enhanced ground floors, and well-articulated roofline, as well as being of a compatible height and scale, and as

such in the case of Bridgewater House, would contribute positively to its composition as part of the established urban block.

Conclusion on Heritage

269. The proposal would preserve the settings and significance of all relevant designated or non-designated heritage assets and would accord with policies CS12 (1) and DM12.1 (1) of the Local Plan 2015 and S11 (2) and HE1 of the emerging City Plan 2040.

Access and Inclusivity

Policy Context

270. The relevant local policies for consideration are CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the emerging City Plan 2040 and policy D5 and D7 of the London Plan. In particular, policy DM10.8 requires to achieve an environment that meets the highest standards of accessibility and inclusive design in all development (both new and refurbished), open spaces and streets.

271. Local Plan policy DM 10.8 requires “to achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished)”. A service provider also has an anticipatory duty under the Act.

272. The proposed development has been carefully designed within the constraints of the existing buildings to ensure that the access needs of all users have been considered.

Arrival at the Site

273. The site is well-served by public transport, including London underground from Barbican and Moorgate, national rail from Farringdon and Moorgate and Buses from Beech Street and Aldersgate Street, noting that public transport is not accessible to all people. The walking distances from key public transport nodes exceed the recommended 50m without a rest. It is therefore recommended that resting points with accessible seating are proposed wherever possible at maximum intervals of 50m along the approaches to the building from key points of arrivals. A travel plan would be secured via a Section 106 agreement to detail how disabled visitors could request support

to get to/from this site if required. The applicant would also be obligated under the travel plan to report on issues relating to access to the site by visitors or tenants. Further details of the travel plan are set in the Transport and Highways section of this report.

274. Consideration has been given to the points of arrival at the site including the primary entrance which has been altered as part of the proposal to provide step free access alongside removing the level change internally. The new ramp would be of a 1:20 gradient providing would be bounded by the building and a planter which would create a minimum upstand of 150 mm in height, which would act as a tapping rail for long cane users as well as a safeguard for wheelchair users. There should also be no projections or overhangs that could pose a hazard (BS 8300 1: 8.1). An Access Management Plan (AMP) for visitors and building users on points of arrival and entrances would be required and would be secured by condition.

275. It is also welcome that a new accessible parking space is proposed on site at the top of the internal courtyard ramp adjacent to the rear exit of the shared kitchen space. Users of the bay would be able to access to the building via the adjacent door through the shared kitchen. Further details of management and design of this entry point and Electric Vehicle Charging (EVCP) would be included within an AMP and secured via condition.

276. Continuing provision of the existing Blue Badge space in the area during construction is important provided it is safe for use and it is recommended that details are reserved of how this continuous provision will be secured through the Deconstruction and Construction Logistic Plan.

Cycle Provision

277. The long stay cycle parking would be accommodated within the basement and would have two means of access either via the internal courtyard at the bottom of the internal ramp which is accessed via the gate located to the northern end of Bridgewater Street or via internal cycle lifts which would be access via the primary entrance of Beech Street. The courtyard ramp is to be retained and regraded however it would be 1:4 gradient in some locations which would not be accessible to number of users, and it would be deemed the secondary means of access to the cycle store, with the majority of users using the cycle lifts. All gates and doors along the route would be automated sized in accordance with Approved Document M. The Access Advisor has advised that controls should meet best practice guidance as set out in BS 8300 (2) 8.2.3 to be accessible to a range of users.

278. The short stay cycle parking spaces would be provided within the public realm along Beech Street located adjacent to the primary entrance.

279. It is noted that 5% of long stay cycle spaces should be suitable for larger cycles in order to meet London Plan 2021 Policy T5B and London Cycling Design Standards 8.2.1 guidance. Irrespective of the approved drawings, full details of the cycle stand types and the setting out of the bike store, including swept paths, and end of trip facilities are reserved for condition to ensure these are well-detailed and are useable promoting a safe, inclusive and welcoming environment.

Entrance

280. All entrances to the development would all be step free, automated and with a minimum clear opening width of at least 1000mm. However, it is noted that the ramp located in the internal courtyard is not accessible and only the top and bottom of the internal courtyard provide inclusive level access. The primary residential entrance along Beech Street would be an automated double leaf sliding door type. Further detail will be secured via condition to ensure the design of the manifestation, thresholds, mat wells and floor finishes, and door furniture are designed to be inclusive-design best practice guidance.

281. Reception facilities should be consistent with AD M(2): 3.6 and BS 8300 8.6.2 Routes from the entrance/lobbies should be logical, clearly defined and unobstructed, with adequate and sufficient circulation space. Reception area desks should be positioned away from the entrance to minimise noise, with lowered counter sections, appropriate hearing enhancement systems and the surface of the reception area should be slip resistant. Details would be provided through condition.

Vertical Movement

282. London Plan D5, (B)5 states ‘in all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building’. 6.2.1 further states that there should be an evacuation lift in addition to fire-fighting lifts. All lifts will be more than 1100x1400mm with appropriately sized landings and back-up lifts are identified across the site in case of failure.

283. The proposed pair of lifts located within the reception lobby would be sized appropriately to provide access to the bike store in the basement. The detail

design would be secured via condition to ensure the lift is designed to accommodate all bike types, in line with London Cycle Design Standards, including larger recumbent bikes as well as being welcoming and inclusive.

Horizontal Movement

284. Corridor widths and door openings are confirmed as consistent with AD M(2), including sufficient door widths and passing places for wheelchairs and will be subject to detailed design development.

Communal Facilities

285. The proposal includes a number of internal communal spaces and the public café all of which should be designed to meet the highest standards of access and inclusion, creating buildings which meet the needs of the existing and future population in line with London Plan D5 3.5.9.

286. BS8300 2: 20.8.4 says that 'Disabled people should have the same access to all fitness and exercise areas, and types of equipment, as non-disabled people' and this should inform the provision of gym equipment/facilities. The gym facilities should be designed in line with best practice guidance produced by Sport England and further details will be secured via the AMP and through recommended condition.

Residential Rooms

287. All rooms would be accessible via step-free routes and 10% of all rooms would be accessible consistent with London Plan Policy E10H. All accessible rooms would be designed in line with AD M4(3) and would have an entrance door with a minimum clear opening of 850mm with minimum of a 300mm leading edge to the door, a 1100x1700mm wheelchair storage and transfer zone, a minimum of 1500mm in front of the kitchenette and ensuite sanitary facilities in line with AD M4(3). Details to be provided in the AMP through recommended condition.

288. All rooms would have a 750mm movement route from the point of entry to the openable window, which is acceptable.

289. The accessible rooms would be prioritised for disabled residents, and there must not be a premium rental cost for these units to disabled residents. Allocation and management of the accessible units is to be secured in the Operational Management Plan as part of the Section 106 agreement.

Terraces and Garden Space

290. The areas of landscape have the potential to offer places for rest and recovery, consistent with guidance in PAS 6463: Design for the Mind.

291. The landscape layout will be conditioned to ensure that it is welcoming and inclusive for a wide range of users and provides a variety of seating options for a range of people including handrails, backrests, and sufficient contrasts. Where bleacher-style seating is proposed it should allow for a wheelchair user to be able to sit alongside another wheelchair user, or seated companion and not project into the access route in front. See BS8300-2:2018 Section 17 for details.

292. The detailed design for the communal amenity terraces and internal courtyard garden should meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users. It is noted that the details of hard and soft landscaping will be secured by condition, and that details on how the planting specification would be inclusive is provided.

Sanitary Facilities

293. It is confirmed that an accessible toilet will be provided at ground floor in close proximity to the Café and communal kitchen.

Signage and Wayfinding

294. Signage and wayfinding will be important for navigating the site and should be designed with reference to guidance in PAS 6463: Design for the Mind and following the principle of ‘two senses’. Details of signage and wayfinding will be secured by condition.

Access and Inclusivity Conclusion

295. The proposal has been designed to ensure that the site meets the highest standard of inclusive design. In order for the proposed co-living use to fulfil its goal of being an inclusive and welcoming place to live, high accessibility standards and inclusive environments and practices are essential. Great consideration has been given as to how to get beyond the limitations posed by the existing building in order to secure the optimal solution for the greatest range of building users. Subject to further design details and an Access Management Plan, it is considered that the proposal accords with the access related policies outlined above.

296. Overall, and subject to the imposition of conditions, the proposal would accord with the access policies outlined above.

Fire Safety

297. Policy D12 of the London Plan requires all development proposals to achieve the highest standards of fire safety.

298. The submission includes a fire statement (Artec Fire, Feb 2024) which sets out how fire safety has been designed into the proposal in consultation with the approving authority (Bureau Veritas Building Control) and sets out how the principles of BS 9991:2015, with reference to Approved Document B Volume 1 (2019, inc. 2020 and 2022 amendments) and BS 9999:2017, where applicable have been followed.

299. Due to the scale of the proposed development, and as it is for a form of housing, the proposal was referred to the Health and Safety Executive (HSE) as a statutory consultee. 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, that the applicant should try to address, in advance of later regulatory stages, where the applicant will have to demonstrate compliance. In response the applicant has affirmed their commitment to this.

300. As the proposal is referrable to HSE, the District Surveyor has not commented on the proposal.

301. Considering HSE are satisfied with the proposed fire strategy, subject to approval at later regulatory stages, the proposal is considered to be acceptable with regards to fire safety, in compliance with Policy D12 of the London Plan.

Transport and Highways

302. Policy DM16.1 of the Local Plan 2015 states that development proposals which are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation in particular addressing impacts on: road dangers; pedestrian environment and movement; cycling infrastructure provision; public transport; and the street network.

303. In line with policy DM16.1 the applicant has submitted a Transport Assessment which covers the above matters. An assessment of the key transportation aspects of the scheme are set out in the following section of this report.

Public Transport

304. The site has a PTAL of 6b and is highly accessible by public transport. Barbican Underground Station is located approximately 150m from the site, taking less than 3-minutes on foot. Barbican is situated on the Circle, Hammersmith and City and Metropolitan lines. These lines offer connections with Hammersmith, Barking, Aldgate, Amersham, Chesham, Uxbridge and Watford.

305. The station benefits from frequent services in both an eastbound and westbound direction, with trains running every 2-4 minutes. The site is near equidistant between Farringdon and Moorgate Railway Stations, taking in the region of 10 minutes on foot, with Farringdon located 800m from the site and Moorgate 650m. From Moorgate, additional Underground services area accessible via the Northern line.

306. Additionally, from Farringdon Railway Station, access to the Elizabeth Line is achievable. Access to the Elizabeth Line is taken from Lindsey Street / Long Lane, approximately 350m from the site taking just over 4 minutes on foot. This offers access to Abbey Wood, Shenfield, London Paddington, Maidenhead and Heathrow Terminals 4 and 5.

307. Bus stops are situated on the A1, north of its junction with Beech Street. The bus stops are accessible within a distance of 200m, taking approximately 3-minutes on foot. There is a bus stop on either side of the carriageway, both of which are characterised by a dedicated shelter with seating, and a flag and a post which includes timetable information. Painted bus cages are provided within the carriageway for the waiting bus.

308. By virtue of the location of the site, footways are provided on all of the surrounding roads, measuring no less than 1.8m in width, with the majority of footways exceeding this width, in accordance with the Department for Transport's (DfT's) Inclusive Mobility (2021) guidance.

309. Signalised pedestrian crossing facilities are available at the A1 / B100 Beech Street / Long Lane junction, providing pedestrians with ease of access to surrounding roads. A raised table facility is provided on Bridgewater Street, within the vicinity of its junction with Beech Street, to enable at grade

pedestrian crossing movements to take place. The raised table is also provided in conjunction with tactile paving.

Trip Generation

310. A trip generation forecast has been conducted for the site which identifies the net change in trips that would result from the proposed development. The assessment has used TRICS travel data from similar developments within London with a PTAL rating of 6A-6B which are considered suitable comparator sites. The assessment includes existing and predicted estimates for trips to the site looking at the existing office space and comparing with the proposed co-living space. Three office surveys have been identified for the existing which are deemed comparable.

311. In order to predict the future trip generation for the proposed use of co-living space, the applicant has used one moderately compatible survey site. Whilst generally trip data from additional sites would be expected, in this case, taking into account that there is no other comparable co-living trip data, it is considered acceptable.

312. The Assessment identifies that the existing development as a whole currently generates around 146 trips during the AM peak (8:00-9:00) and 127 trips during the PM peak (17:00-18:00), with a total of 962 daily trips currently being generated. The assessment of the proposed scheme is predicted to generate 60 trips during the AM peak (8:00-9:00) and 43 trips during the PM peak (17:00-18:00), with a total of 423 daily trips currently being generated. This is a decrease of -86 trips during the AM peak (8:00-9:00) and -85 trips during the PM peak (17:00-18:00), with a total decrease of -539 daily trips likely to be generated by these proposals.

313. Notwithstanding the minor concern raised regarding the methodology of the assessment, officers consider that the overall trip generation for the site would be a reduction and reduce the impact on the public highway and is therefore acceptable.

Delivery and Servicing

314. Policy DM16.5 of the Local Plan states developments should be designed to allow for on-site servicing. London Plan Policy T7 G and draft City Plan 2036 Policy VT2 – 1 requires development proposals to provide adequate space off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.

315. DM 11.5 Parking and servicing standards states on site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded.

316. The proposed development will be car free. As a result, all vehicle trips generated by the development will be associated with delivery and servicing. A mix of double and single yellow line parking restrictions are in place surrounding the site, though it is noted that the length of Beech Street and Bridgewater Street are subject to double yellow line restrictions. Loading restrictions are also present on Beech Street, prohibiting loading at any time or to within certain time periods at the locations covered. No loading restrictions are present on Bridgewater Street.

317. In light of the restrictions on Beech Street (which prohibits loading between the hours of 07:00 and 19:00) it is considered that servicing and deliveries to the site will continue to take place on Bridgewater Street. It is anticipated that there will be 10-15 deliveries a day generated by the site, which can be conducted from Bridgewater Street, which is considered acceptable, subject to a condition which would be attached so that these activities would be restricted within the standard peak hours of 07:00-10:00, 12:00-14:00 and 16:00-19:00. To ensure that no more than 10 to 15 deliveries/servicing trips can take place, a condition would be secured limit the trips to site.

318. The waste collection store would be at ground level facing onto Bridgewater Street. A bin storage area would be located in the basement. The City Cleansing team have been consulted, and confirmed the proposed waste storage and collection facilities to comply the relevant requirements. The waste storage area is to be secured by condition. The servicing time restriction condition includes collection of refuse and recycling.

Cycle Parking

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

320. London Plan Policy T5 (Cycling) requires cycle parking be provided at least in accordance with the minimum requirements set out within the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and that

developments should cater for larger cycles, including adapted cycles for disabled people.

321. Within the recently adopted 'London Plan Guidance: Large-Scale Purpose Build Shared Living' document it is noted that cycle parking standards for co-living developments are outlined as being 0.75 spaces per person. The development proposals comprise the construction of 174 co-living spaces, which will house one person per unit. Based on a standard of 0.75 spaces per person, this would equate to a requirement of 131 spaces. The development proposals provide a total of 134 long stay spaces, with a further 12 short stay parking spaces proposed on street for visitor needs. The long stay onsite cycle parking has also been developed to offer a variety of parking types, including Sheffield stands, oversized cycle spaces and two-tier racks, to accommodate all residents' needs. In light of the above, it is considered that the onsite cycle parking provision accords with the prevailing standard for this land use.

322. The level of cycle parking proposed as part of the development meets the minimum requirements based on the London Plan for long stay and short stay parking, as shown in the table below.

London Plan long stay requirements	Proposed long stay	London Plan short stay requirements	Proposed short stay
131	134	5	12

323. Short stay cycle parking would also be provided on Beech Street on private land at the front of the site, which would accommodate visitors and deliveries by bicycle.

324. The long stay cycle parking is proposed at basement level which is accessed via the main Beech Street entrance via stairs and accessible lifts that lead down into the basement, as well as alternative access via the ramp to the rear. The lifts provided would be sufficient in size to accommodate all types of cycle and would have the capacity to accommodate more than one cycle and officers are satisfied that it has sufficient capacity, taking into account the additional ramp which will serve as the main access for the cycle parking.

325. A condition is recommended to secure 134 long stay cycle parking spaces and 12 short stay cycle parking spaces, in line with London Plan policy requirements as detailed above.

Car parking

326. London Plan Policy T6 (Car parking), Local Plan 2015 Policy DM16.5 and the draft City Plan 2040 Policy VT3 require developments in the City to be car-free except for designated Blue Badge spaces.

327. The existing building has a car parking area in the basement. Access is via a crossover from Bridgewater Street followed by a level drop from ground to basement, which falls at a gradient which would be considered significantly steep.

328. The London Plan, Policy D7 on Accessible Housing, states that at least 10% of all new built homes in London must meet the building regulations for the Wheelchair User Dwellings (WUD).

329. Policy T6 of the London Plan, sets out car parking standards and strategic direction to facilitate new developments with the appropriate levels of parking.

330. Policy T6.1 on residential parking, (part G), indicates that parking for disabled people to be provided for proposals that are delivering 10 or more units. The level of provision is as per the following criteria:
    a) For 3% of the dwellings provided, at least one designated disabled persons parking bay per dwelling to be made available from the outset. This proposal has 174 dwellings, thus the policy would expect 5 disabled car parking spaces to be available from the outset.
    b) For this proposal an additional 7% equates to 12 disabled car parking spaces to be made available, should there be an increase in demand at any point in the future

331. This proposal includes 1 disabled parking space on site, accessed from Bridgewater Street, using the existing vehicle crossover. This would be 4 spaces less than the Policy T6.1 (1) expectation and no provision for the additional spaces for the (2) requirement to deal with the case when there is an increase in demand.

332. The submitted Transport Assessment (TA) justifies this lower provision based on the Department for Transport (DfT) statistics, which shows that CoL has the lowest level of Blue Badges held as a proportion of the population at 1.2%. This figure is then collaborated with most recent Census data which is sightly higher at 1.7%. The TA concludes that the low provision for the disabled car parking should be acceptable based on the findings.

333. DfT statistics on the blue badge scheme, published on the 25th Jan 2022, shows that CoL has the lowest blue badge intake at 1.2 % proportion of the population.

334. The City of London operates the ‘red badge parking scheme’, facilitating on-street parking for disabled people. It covers people who work in the City and its residents. However there are restrictions on the use of Blue/Red badge permits, which means that permits issued are not guaranteed to fulfil the needs of the disabled users of this development.

335. On-street disabled parking, located nearby, can be used by Blue Badge or Red Badge holding residents and visitors of this development, if the demand is higher than provided within the site.

336. Originally the submission did not include an on-site accessible parking space. Officers have worked with the applicant team to identify possible locations for on-site accessible parking, and the proposed location of one space is the only area that could be identified. Vehicles could not park further down the courtyard ramp, as they would not be able to turn within the site, and would need to therefore perform long reversing manoeuvres, which would not be safe.

337. The proposed basement space is also working hard to accommodate the required level of cycle parking, plant and communal facilities for the co-living development, and it would not be suitable for additional accessible parking alongside these. Furthermore, the existing ramp situation is far from ideal for traversing vehicles to access the basement area.

338. On balance therefore, officers consider the provision of a single accessible parking space on site to be acceptable for the proposed development.

Travel Plan

339. Residential Travel Plans would be secured via the Section 106 agreement. The foundation of the Travel Plan should include measures to support disabled users of this development. Prior to signing of the tenancy contract, each disabled resident should have a tailored travel plan, and be supported through appropriate initiatives. Similarly, disabled visitors of this development could request support to get to/from this site, if public transport does not meet their needs.

340. Not all Underground stations nearby have step free access therefore some disabled users of this development may require additional support. Introducing measures, such as, arranging a pick-up from nearby underground station, or other pre-arranged locations, could form part of the Travel Plan measures.

341. In addition, the applicant is required to monitor the demand for on-street disabled parking spaces coming from their development, and encourage the use of public transport through travel planning measures.

342. Annual surveys to establish the main mode of travel for all users of this development , is required. The findings of the surveys to be compiled on a report, with proposed measures on how to support further the use of sustainable modes of transport. These surveys, along with the residential Travel Plans, will be secured via a Section 106 legal agreement.

343. In addition, the proposed development is car-free, as such a clause in the Section 106 agreement would prohibit any future resident from securing a residential parking permit should they become available in the City of London. A condition is recommended to secure a Disabled Parking Design and Management Plan, detailing the following:
    - Include Electric Vehicle Charging Point (EVCP) for the disabled car parking space
    - Accessing the disabled parking bay is via a door. Details of how this is achieved to comply with 'No waiting on the public highway'
    - Health & Safety audit and risk assessment for the disabled user of the car parking space.
    - Allocation criteria for the disabled car parking space
    - Monitoring the use, non-compliance/ enforcement

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

344. The proposal would involve a significant amount of demolition and construction works both below and above ground level. This will generate a large number of construction vehicle movements during the overall construction period. The proposed works could therefore have a significant impact on the operation of the public highway in the local area if not managed effectively. The primary concern is public safety but its also must be ensured that construction traffic does not create (or add to existing) traffic congestion or impact on the road safety or amenity of other highway users. The works, if incorrectly managed could also lead to a variety of amenity issues for local people (e.g. noise, vibration, air quality), and objections have been received relating to this.

345. A preliminary Construction Logistic Plan (CLP) has been submitted in support of the planning application. It lacks detail but is a good example of what we are looking for at this stage in the process. A more detailed CLP would be prepared once a Principal Contractor has been appointed, which will need to

be in line with TfLs Construction Logistics Plan Guidance. This should consider the following points:

- Construction vehicle routes to and from the site will need to make the most efficient use of the highway network in the Central London Area. Such routes will require discussion with Highways Management.
- The proposed works are likely to generate a significant amount of workers on the site at any given time. We will expect the Principal Contractor to prepare travel planning guidance to encourage workers to use sustainable transport instead of private motor vehicles.
- Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc).
- Traffic congestion is already a significant problem in The CoL, particularly during morning and afternoon/evening peak periods. We will therefore expect construction vehicle movements to be scheduled to avoid 0800 to 0930 and 1600 to 1830 hours on Monday to Friday.
- Details will be required to describe how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements.
- The site would be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme: http://www.clocs.org.uk/standard-for-clocs/

346. The City needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. Therefore a Construction Logistics Management Plan (CLMP) is recommended to be secured by condition to ensure the construction and demolition of the site is in accordance with The London Plan Policy T7 and DM16.1 of the Local Plan. This would be expected to provide a mechanism to manage/mitigate the impacts which the proposed development would have on the local area. The CLMP would need to be approved by officers prior to works commencing on site.

Section 278 Works

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

348. Bridgewater Street:

- Reinstatement of the carriageways, incorporating any movement of kerb lines required.
- Reconstruction of footways.
- Decluttering of the footway and removal of redundant furniture
- If viable, addition of accessible parking bay (investigations and implementation).

349. Beech Street:
    - Reinstatement of the footways .
    - Resurfacing of the carriageways.
    - Decluttering of the footway and removal of redundant furniture

350. Development requiring works to the highway following development will be secured through planning obligation to repair any construction damage to transport infrastructure or landscaping and reinstate all affected transport network links and road and footway surfaces. This will also need to include all, but not limited to the amendments outlined above.

Transport and Highways conclusions

351. The proposals are acceptable in transport terms, subject to the recommended planning obligations and conditions below:

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

353. Condition: Delivery/Servicing plan

354. A condition requiring the provision of 134 long stay cycle parking spaces, 12 short stay cycle parking for the entire development, designed to London Cycle Design Standards and the ongoing retention of these facilities, details of which will need to be submitted and approved, and approval should be reserved by condition.

355. Condition: submission of Parking Design and Management Plan

356. Section 106 - no parking permits for future residents (unless a red badge holder)

357. A Section 106 planning obligation to secure a residential Travel Plan (TP) for the development, including personal travel plans for those with additional access requirements.

358. A Section 278 agreement to secure the cost of public highway and public realm improvement works in the general vicinity of the site. These works would include but are not limited to repaving of the carriageway directly outside the site on Bridgewater Street and Beech Street.

359. Section 278 highways remedial works - to ensure if any damage is done on the public highway that the applicant pays to reinstate.

360. **Amenity**

Policy Context

361. Local Plan Policies CS21 (Housing) and DM21.3 ('Residential Environment') and draft City Plan policies S3 and HS3, requires amenity of existing residents in identified residential areas to be protected; and The surrounding area largely residential.

362. Local Plan policy DM15.7 and Draft City Plan policy HL3 require noise pollution to be considered.

363. Local Plan policy DM10.7, draft City Plan policy DE8, and London Plan policy D6 considers impact of development on existing daylight and sunlight of residential properties.

364. Objections have been received relating to noise and disturbance from the proposed Co-Living use, in particular resulting from the external areas. Objections also refer to loss of privacy, and loss of daylight and sunlight to their residential properties resulting from the proposed extension.

Noise and disturbance

365. Neighbouring residential occupants have raised concerns relating to noise impacts resulting from the proposed co-living development, and the publicly accessible cafe and co-working space at ground level, which the submitted. Draft Operational Management Plan and Planning Statement suggest could be used for as yet unspecified events.

366. Firstly, noise generated by residents living at their home is not considered harmful, this is a residential area, and noise from general residential activity is to be expected and no unreasonable impacts are likely to result to neighbouring amenity. Notwithstanding, as is required by Policy H16, an operational management plan has been submitted, which includes measures of how management would control the potential for residents to generate unreasonable levels of noise which could result in harmful disturbance to neighbouring residents.

367. Turning to the objections regarding noise from events within the publicly accessible areas of ground floor space (which includes co-working and a cafe), which the applicant states will be used for events, which could include live music, educational talks as well as flexible everyday working/creating stations. Officers do not consider this an inherently noisy use, and any noise outbreak can be controlled with suitable soundproofing of the building. A condition is also recommended that 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.

368. A Noise and Vibration Impact Assessment (Format, February 2024) report has been submitted. The report generally assesses the level of noise internally within the proposed development, but also makes an initial assessment regarding potential plant noise and ultimately concludes this to be acceptable, subject to later design stages.

369. Environmental health officers have been consulted, and have raised no concerns, subject to several conditions that have been recommended, including: controlling the hours of use of external areas, no amplified music in external areas or to be audible from outside the premises, restricted overnight and Sunday deliveries, and details to be submitted for plant equipment. Furthermore, conditions are recommended to ensure that private co-living units are adequately sound-attenuated to ensure acceptable conditions for future residents.

370. Objections have been received relating to noise emanating from the external areas. Use of the terrace and courtyard would be restricted between 10pm and 7am the following morning, and no amplified music would be allowed to be used in these areas at all, as a condition of development. Considering the relative small size of the proposed roof terrace together with the restricted hours, officers do not consider the opportunity for large gathering or parties are likely to arise, which could result in significant levels of noise and disturbance to neighbours. Furthermore, the draft Operational Management Plan states that the on site security, staff and management, who will have a

presence 24 hours a day, 7 days a week, will actively manage any disruptive noise or anti-social behaviour that does arise, and this is considered acceptable. The final operational management plan would be secured by Section 106 Agreement.

Daylight and Sunlight Impact Assessment

371. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context.

372. Local Plan 2015 Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.

373. Draft City Plan 2040 Policy DE7 states that development proposals will be required to demonstrate that daylight and sunlight available to nearby dwellings and other sensitive receptors, including open spaces, is appropriate for its context and provides acceptable standards taking account of the Building Research Establishment's guidelines.

374. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the draft City Plan 2040 states when considering impact on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.

375. Daylight has been assessed using both the Vertical Sky Component (VSC) and No Sky Line (NSL), also known as Daylight Distribution, tests these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assessed the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC or NSL guidelines are not met.

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

377. Officers note that if the existing VSC of a window is less than 27%, it is likely that it is already poorly naturally lit and is therefore sensitive to further change.

378. Both the London Plan 2021 and draft City Plan 2040 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.

Methodology

379. A daylight and sunlight report has been submitted (Anstey Horne, February 2024) and its findings have been interrogated by BRE as part of an independent review (BRE, 12 July 2024) of the report. The report analyses loss of daylight and sunlight to existing properties using BRE Report BR 209 'Site layout planning for daylight and sunlight: a guide to good practice', third edition, June 2022.

380. Loss of Daylight: Where the obstruction angle is greater than 25°, or not relevant, or the distance criterion is not met, more detailed calculations should be performed. To assess the impact on the amount of diffuse daylight entering existing buildings, the BRE Report uses two criteria:
    a) The vertical sky component (VSC) on the window wall, and
    b) Daylight distribution in the existing rooms, based on the areas of the working plane which can receive direct skylight before and after development (the no sky line methodology).
        - The diffuse daylighting of an existing building may be adversely affected if the vertical sky component or daylight distribution results are below the guidelines. For each test the guidelines operate on the general principle that if the amount of daylight is reduced to less than 0.8 times its former value (i.e. there will be more than a 20% loss) the reduction will be noticeable to the building's occupant.
        - The loss of daylight guidelines within the BRE Report are intended for use for habitable rooms (i.e. living rooms, kitchens, dining rooms and bedrooms) in nearby dwellings.

381. Loss of Sunlight to Windows: The BRE Report recommends that in existing buildings sunlight should be checked for all main living rooms of dwellings, and conservatories, if they have a window facing within 90° of due south. If the centre of the window can receive more than one quarter of annual probable sunlight hours (APSH), including at least 5% of annual probable sunlight hours in the winter months between 21 September and 21 March, then the room should still receive enough sunlight. Any reduction in sunlight access below this level should be kept to a minimum. If the available sunlight hours are both less than the amount above, less than 0.8 times their former value, and annual probable sunlight hours more than 4% lower than previously, then the sunlighting of the existing dwelling may be adversely affected. Annual and winter probable sunlight hours are appropriate methods

to assess loss of sunlight to an existing building due to a proposed development. This guideline is also used in the Anstey Horne assessment, Appendix D of which gives probable sunlight hours 'before' and 'after' for the surrounding windows analysed.

382. Loss of Sunlight to Gardens: The assessment doesn't include any existing gardens or open spaces in the analysis of loss of sunlight, which is acceptable because, although there is an external amenity space to the north of Ben Jonson House which has a green area at its western end in the vicinity of the proposed development with the potential for sunlight to be slightly impacted, sunlight to the overall amenity space taken as a whole is not considered to be affected.

383. Environmental Impact Assessment: Appendix H of the BRE Report gives advice on using the loss of daylight and sunlight guidelines as the basis for an environmental impact assessment. Where the loss of skylight or sunlight fully meets the guidelines in the document, the impact is assessed as negligible or minor adverse. Where the loss of light is well within the guidelines, or only a small number of windows or limited area of open space lose light (within the guidelines), a classification of negligible impact is more appropriate. Where the loss of light is only just within the guidelines, and a larger number of windows or open space area are affected, a minor adverse impact would be more appropriate, especially if there is a particularly strong requirement for daylight and sunlight in the affected building or open space. Where the loss of skylight or sunlight does not meet the guidelines, the impact is assessed as minor, moderate or major adverse.

<u>Results of Assessment and BRE independent review</u>

384. A total of 5 buildings have been considered as sensitive receptors. The following properties are assessed:
    - 6-9 Bridgewater Square
    - 10-15 Bridgewater Square
    - Ben Jonson House
    - Defoe House
    - Shakespeare Tower
385. The headline adherence rates for the site are as follows:
    - 382 (82%) of the 464 windows tested for VSC achieve the guideline values
    - 256 (94%) of the 271 rooms tested for daylight distribution achieve the guideline values
    - 69 (86%) of the 80 rooms tested for APSH achieve the guideline values on an annual basis and 60 (75%) achieve the guideline values on a winter basis.

386. A more detailed breakdown of the analysis follows:

387. **6-9 Bridgewater Square:** This residential building, also named Bridgewater House, is immediately to the north of the proposal site and has south elevation windows that face into the courtyard which this building forms with 45 Beech Street and Bryer Court. The assessment has analysed 32 windows at 6-9 Bridgewater Square facing the proposed development.

388. Results suggest that 11 (34%) of the 32 windows assessed achieve the guideline values for VSC by retaining greater than 0.8 times their former value. A further 9 of these windows achieve a factor former value of 0.70 or greater and therefore only fall slightly short of the guidelines.

389. All first to fifth floor windows analysed that light bedrooms would be affected, and the impact is assessed as:
    - major adverse for four windows,
    - moderate adverse for nine windows,
    - minor adverse for three windows.
    - A window to a fourth-floor kitchen would experience a minor adverse impact.
    - There are also four windows on the seventh floor that would have a minor adverse impact, three lighting bedrooms and the other a living room.

390. Officers note that many of the windows achieve low daylight levels in the existing condition and are therefore sensitive to further change. For example on the first floor, the absolute existing VSCs range from 5.93% to 7.65% in the existing condition and from 3.27% to 5.29% in the proposed condition. Whilst these reductions are small in absolute terms, they manifest as disproportionately large relative reductions.

391. The ranges of impacts are higher on the upper floors, for example at second to fifth floor level absolute existing VSCs range from 7.38% to 19.74%, and from 4.24% to 15.49% in the proposed condition, however none of the rooms tested at first to fifth floor level had an existing VSC of 27% or above as existing and so these are already likely to be poorly lit. All of these windows, bar two serving kitchens on the fourth and fifth floors, are serving bedrooms.

392. No sky line (NSL) results are reported for 23 rooms at this property and the results suggest that eight rooms would meet the NSL guideline, whereas the other fifteen failing to meet the guideline would experience relative reductions in the percentage area able to receive direct skylight between 3% and 56%, compared to the 20% guideline.

393. All first to fifth floor rooms analysed bar one would be affected. However, most of these are bedrooms and therefore less important for daylight distribution. There is another bedroom on the seven floor that would have its daylight distribution impacted. Nevertheless, daylight distribution would be significantly affected for two kitchens, one on the fourth floor with a major adverse impact and another on the fifth floor with a moderate adverse impact. These two kitchens appear to also be served by additional windows on different elevations however.

394. The overall impact on daylight to 6-9 Bridgewater Square is assessed as major adverse because a large number of windows are affected and in some cases the loss of light is substantially outside the guidelines.

395. With regards loss of sunlight, Anstey Horne have reported results for 32 windows facing within 90 degrees of due south that have a view of the proposed development. The results are given for each individual window as well as for the whole room where a room is served by more than a windows, resulting in 23 rooms analysed. Considering the results at room level, 11 rooms would fully meet the probable sunlight hours guidelines, whilst eight other rooms would experience a loss both in annual and winter sunlight, three other rooms would experience a loss in annual sunlight and one other in winter sunlight. However, none of the rooms that would have their sunlight affected appears to be a living room and loss of sunlight to these windows is therefore less relevant. Therefore, because the guidelines for loss of sunlight are applicable to windows that light living rooms, a negligible impact on sunlight to windows at 6-9 Bridgewater Square is assessed.

396. In Summary, there would be a major adverse impact to 6-9 Bridgewater Square with regards to daylight, however, the windows and rooms in the south elevation of 6-9 Bridgewater Square face directly into the courtyard and therefore onto the proposed development site. The daylight levels within the building are low in the existing condition, particularly on the first to fifth floor levels, where the impact would be greatest. Given the densely developed city centre environment and the sensitivity of these windows and rooms to change, any meaningful development would cause reductions outside of the guidelines.

397. **Ben Johnson House:** This residential neighbouring property is located to the east of the development site and the internal layouts have been based on information obtained from the Barbican Living website.

398. The results show that 7 (70%) of the 10 windows assessed achieve the guideline values for VSC by retaining greater than 0.8 times their former

value. The other three failing to meet the guidelines would experience relative reductions in VSC values between 27% and 36%, compared to the 20% guideline, with retained VSC values between 15.1% and 23.1%. Two of these windows, one on the second floor and the other on the third floor, would experience a moderate adverse impact, whilst the other window affected would experience a minor adverse impact.

399. Officers note that each of the windows which falls short of the guideline values serves a room which is also served by at least two other windows which are shown to meet the guideline values. Where multiple windows serve the same room, the BRE states that a weighted mean average based upon window sizes can be applied. For two of the three windows which fall short of the guideline values, the weighted mean average VSC for the rooms meets the guideline.

400. No sky line (NSL) results are reported for the three rooms at this property, which fall below the VSC guidance, and they are all bedrooms. The results suggest that all rooms analysed would meet the NSL guideline, with no significant impact.

401. Based on the results, the overall impact on daylight to Ben Jonson House is assessed as minor adverse because a small number of windows are affected.

402. With regards loss of sunlight, Anstey Horne have reported results for 10 windows facing within 90 degrees of due south that have a view of the proposed development. The results are given for each individual window as well as for the whole room where a room is served by more than a windows, resulting in three rooms analysed in total. Notwithstanding that all windows analysed appear to light bedrooms which are less relevant in terms of loss of sunlight, all windows and rooms analysed would fully meet the probable sunlight hours guidelines. A negligible impact on sunlight to windows at Ben Jonson House is therefore assessed.

403. **10-15 Bridgewater Square:** This residential neighbouring property is located to the north-east of the development site and the internal layouts have been based on information obtained from local authority records. 59 windows serving 36 rooms have been assessed. The results confirm that all 59 (100%) of the 59 windows assessed for VSC meet or exceed the guideline values.

404. The daylight distribution results demonstrate that all 36 (100%) of the 36 rooms assessed achieve the guideline values with many of the rooms experiencing no reduction in lit area. The overall impact to daylight is negligible to this property.

405. 25 rooms would fully meet the probable sunlight hours guidelines, whilst the other 11 would experience a loss in winter sunlight. However, none of the rooms that would have their sunlight affected appears to be a living room and loss of sunlight to these windows is less relevant. Therefore, because the guidelines for loss of sunlight are applicable to windows that light living rooms, a negligible impact on sunlight to windows at 10-15 Bridgewater Square is assessed.

406. **Defoe House:** This residential neighbouring property is located to the south of the development site and the internal layouts have been based on information obtained from the Barbican Living website.

407. The assessment has analysed 291 windows at Defoe House facing the proposed development, all of which appear to light bedrooms. Results suggest that 242 windows would meet the VSC guidelines, whereas the other 49 failing to meet the guidelines would experience relative reductions in VSC values between 21% and 62%, compared to the 20% guideline. However, all affected windows appear to be small fanlight windows above a balcony door and the rooms these windows serve also have other larger windows which meet the VSC guidelines. Since these windows light the same area of each room they serve, the area weighted average VSC can be calculated as recommended by the BRE Report. Although Anstey Horne have not used this approach in their assessment, area weighted average VSC values can be determined based on the layouts included in their assessment as well as data collected during the BRE site visit. The results of this additional calculation (carried out by BRE in their review) indicate relative reductions in area weighted average VSC values of up to 7%, compared to the 20% guideline, which suggests that loss of VSC to each room as a whole would comfortably meet the guideline.

408. No sky line (NSL) results are reported by Anstey Horne for 164 rooms at this property, all bedrooms. Results suggest that all rooms analysed would meet the NSL guideline.

409. Based on the results in the Anstey Horne assessment, the overall impact on daylight to Defoe House is assessed as negligible. Loss of sunlight to Defoe House is not relevant since all windows facing the proposed development do not face within 90 degrees of due south.

410. **Shakespeare Tower:** No Impacts identified, achieves full adherence to the BRE guidelines for both daylight and sunlight.

Daylight and Sunlight Conclusions

411. The scope of the submitted assessment is appropriate, and all nearby relevant buildings have been included in the analysis. Cumulative impacts have not been considered, which is considered appropriate since no other planning applications could be identified in the vicinity of the proposal site.

BRE have carried out an independent review of the assessment and have confirmed this.

412. The results of the daylight and sunlight impact assessments are summarised below:
    - ***6-9 Bridgewater Square***
      Major adverse impact on daylight
      Negligible impact on sunlight to windows
    - ***Ben Jonson House***
      Minor adverse impact on daylight
      Negligible impact on sunlight to windows
    - ***10-15 Bridgewater Square***
      Negligible impact on daylight
      Negligible impact on sunlight to windows
    - ***Defoe House -*** Negligible impact on daylight
    - ***Shakespeare Tower -*** Negligible impact on daylight

413. The assessment confirms that properties within 6-9 Bridgewater Square will be most impacted as a result of the proposal with regards to loss of daylight, overall receiving a major adverse impact. Most affected are those south facing windows directly towards the application site from first to fifth floor levels and the vast majority of those affected are bedroom windows, for which daylight distribution is considered to be less important in the BRE guidance. Many of these windows also have limited daylight as the existing starting point, and are therefore comparatively sensitive to further change.

414. Officers note however that daylight distribution would be significantly affected for two kitchens, one on the fourth floor with a major adverse impact (VSC change factor of 0.74, and NSL change factor of 0.54) and another on the fifth floor with a moderate adverse impact (VSC change factor of 0.8, and NSL change factor of 0.67) compared to the guideline target factors of 0.8.

415. The assessment also confirms a minor adverse impact on daylight to Ben Johnson House, specifically to three windows, one on the 2nd floor (VSC change factor of 0.6), one on the third floor (VSC change factor of 0.65) and one on the fifth floor (VSC change factor of 0.73), compared to the guideline target of 0.8. However each of the windows which falls short of the guideline values serves a room which is also served by at least two other windows. For two of the three windows which fall short of the guideline values, the weighted mean average VSC for the rooms does meet the guideline. Therefore the minor adverse impacts identified, when considered on balance of all other considerations, are considered to be acceptable in this case.

416. Considering the majority of adversely impacted windows are bedrooms, the existing poor daylighting factors, and the fact this is a tight knit urban environment, although some minor and major adverse impacts have been identified, in this case officers consider this to be acceptable overall, especially when considering the other merits of the application, including the

retention of the majority of the existing building, and its redevelopment as housing, including a payment in lieu towards affordable housing.

Loss of Privacy

417. Some concern has been raised to overlooking from the proposed roof terrace. The proposed level 9 roof terrace would not directly overlook any existing residential properties or amenity areas. Furthermore, screening would be provided as edge planting, details of which (including maintenance) are recommended to be secured by condition. Officers do not consider the proposed roof terrace would result in a loss of privacy to neighbouring occupants.

418. The proposed new windows in the upper-level extension would not create significantly different overlooking opportunities than those existing below. The proposed change of use, whilst may result in different patterns of use of the building, would not result in a significant loss of privacy to neighbouring properties. Although some of the window-to-window distances are quite close, this is the existing situation, and in this tight grain urban environment some interlooking between properties is to be expected.

419. The proposal is therfore not considered to result in unreasonable loss of privacy to neighbouring occupants.

Amenity conclusions

420. Overall, there would be no unreasonable impacts to the amenity of neighbouring occupiers, in line with the aforementioned policies.

421. The proposed development would have some minor and major adverse impacts upon daylight and sunlight to surrounding residential properties, however considering the majority of adversely impacted windows are bedrooms, the existing poor daylighting factors, and the fact this is a tight knit urban environment, officers consider the amenity impacts to be acceptable. Concerns relating to noise and disturbance arising from the proposed use would be controlled through several conditions and the operational management plan, which would be secured through a Section 106 agreement.

Ecological Impacts

422. Chapter 15 of the NPPF relates to preserving and enhancing the natural environment. The environments is one of the three overarching objectives that define sustainable development.

423. Policy CS15 of the adopted City Plan (2015) paragraph 4(vi) states the need to enhance biodiversity and provide for its conservation and enhancement,

particularly for the City's flagship species and the City's priority habitats. Policy OS3 of the draft City Plan 2040 requires development to incorporate measures to enhance biodiversity, including measures recommended in the City of London Biodiversity Action Plan (BAP, 2021) in relation to particular species or habitats and action plans.

424. A preliminary ecological appraisal report (Maydencroft Limited, February 2024) has been submitted. A site survey was carried out on 25th January 2024. The habitats on Site include; buildings and built linear features and have the potential to support; roosting bats and nesting birds.

425. The report concluded that, subject to recommendations for further surveys, the proposed works on Site are not considered likely to impact any internationally, nationally or locally designated sites. A bat roost inspection by use of an endoscope and at least one bat dusk emergence survey of the building is recommended in the report, to determine if the building is being utilised by roosting bats.

426. The applicant has therefore submitted the results bat roost inspections by use of an endoscope and dusk emergence survey (Maydencroft, 28 August 2024). The endoscope inspection was carried out on 15th July 2024 and has resulted in the assessed suitability of the building for roosting bats being upgraded from low to moderate, as such two emergence surveys are required.

427. A bat roost emergence survey was carried out on 23rd July and another on 21st August 2024. A single pipistrellus sp. bat was heard by the surveyor during the July survey. The bat was only heard briefly and was a considerable distance from the building. No bats were seen emerging or in the surrounding area in either survey, including in footage from infrared cameras which was analysed after the survey and no bats were observed.

428. It is therefore considered unlikely that the proposed development would affect roosting bats. Notwithstanding the ecologist has recommended that the works proceeds with caution and that if any indication of roosting bats are found then the works should cease immediately and advice from the ecologist should be sought.

429. Bats are included in the list of species in Schedule 5 of the Wildlife and Countryside Act 1981, which makes it illegal to intentionally capture, injure, or kill bats. It also protects their roosts, meaning it is illegal to damage or destroy a place used by bats for breeding or resting, even if bats are not present at the time.

430. Bats are also defined as a target species in the City of London Biodiversity Action Plan (2021).

431. Mitigation measures for the proposed development include; - Works to be undertaken outside of bird nesting season to avoid disturbance to nesting birds. If undertaken during bird nesting season, an ecologist must first

conduct a nesting bird check. - Sensitive lighting for foraging and commuting bats.

432. Subject to the proposed mitigation measures, which would be secured by condition, the impact upon wildlife and ecology is considered to be acceptable, in line with Policy C15 of the City Plan, the City Biodiversity Action Plan and Policy OS3 of the emerging draft City Plan 2024.

Air Quality

433. Policy DM 15.6 Air quality requires applicants to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment. Developers will be encouraged to install non-combustion low and zero carbon energy technology.

434. The Air Quality Officer has been consulted and confirmed no objections to the proposed development following submission of additional information relating to the proposed extractor flue for the emergency generator.

435. The proposed development would 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.

436. The recommended conditions are for additional details and a restriction on the use of the backup generator in emergencies and for testing only and that flues must terminate at an appropriate height, as well as a requirement to sign up for NRMM.

Planning Obligations and Community Infrastructure Levy

437. 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.

438. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

439. 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).

440. 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	£129,347.00	£5,389.00

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	£119,999.00	£6,316.00
City Planning Obligations			
Affordable Housing	£8,510,568.00	£8,425,462.00	£85,106.00
Local, Training, Skills and Job Brokerage	£8,421.00	£8,337.00	£84.00
Carbon Reduction Shortfall (*as designed*) *Not indexed*	£125,918	£125,918	£0
Section 278 (Evaluation and Design Fee) *Not indexed*	£50,000.00	£50,000.00	£0
S106 Monitoring Charge	£3,000	£0	£3,000
Total liability in accordance with the City of London's policies	**£8,824,222.00**	**£8,729,716.00**	**£94,505.00**

City's Planning Obligations

441. 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*)
    - Travel Plan (including a Travel Plan for Disabled Users)
    - 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*)
    - Co-Living Accommodation (*Operational Management Plan*)
    - Prohibition against parking permits for future residents of the development
    - Viability Review
    - Marketing and Lettings Management plan

442. 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.

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

Bridgewater Street

- Reinstatement of the carriageways, incorporating any movement of kerb lines required.
- Reconstruction of footways.
- Decluttering of the footway and removal of redundant furniture
- If viable, addition of accessible parking bay (investigations and implementation).

Beech Street

- Reinstatement of the footways.
- Resurfacing of the carriageways.
- Decluttering of the footway and removal of redundant furniture

Monitoring and Administrative Costs

444. 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.

445. 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.

Public Sector Equalities Duty

446. When considering the proposed development, the Public Sector Equality Duty requires the City of London Corporation to consider how the determination of the application will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.

447. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:
- eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

448. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

449. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.

450. This application has been assessed against the Equality Act 2010 and any equality impacts identified. It is the view of officers that a decision to grant planning permission, subject to the recommended conditions, would not disadvantage those who are protected under the Equality Act 2010.

451. In relation to policy GG1 of the London Plan, the proposals are considered to support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.

Human Rights Act 1998

452. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR").

453. Officers have given consideration towards the interference with the right to respect for one's private and family life (Article 8 of the ECHR) or peaceful enjoyment of one's possessions (Article 1 of Protocol 1), including by causing harm to the amenity of those living in nearby residential properties. Officers have assessed the level of harm that would result to neighbouring amenity to be acceptable, and therefore do not consider the proposal would result in an infringement of the ECHR as a result of the proposal.

454. Therefore, it is the view of officers that there would be no infringement of Article 8 or Article 1 of Protocol 1 of the ECHR as a result of refusal of planning permission.

Conclusions

455. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the National Planning Policy Framework, and the emerging Local Plan and considering all other material considerations.

456. The principle of development is acceptable, the office use has been demonstrated to no longer be viable at the site, and this location is considered to be suitable for co-living residential development in principle. The quality of accommodation and communal facilities to be provided is considered to be acceptable, whilst contributing The City's annual housing targets (equivalent to 97 conventional housing units) and increasing housing choice for Londoners, in line with the aforementioned policies.

457. Sustainability principles have been followed, the existing building would be largely retained and extended to be repurposed and the proposal is policy compliant with regards to Carbon Optioneering, Whole Life Carbon, Urban greening and biodiversity net gain. The retention and reuse of the existing building as a form of housing is a planning merit to which officers assign a great deal of weight.

458. The proposed design has evolved in conjunction with officers since an early pre-application stage, and it is considered that the architectural design of the building would be compatible with the existing context in terms of scale and massing and be read as a well-layered piece of design, which would improve the building's contribution to the local townscape. Furthermore the proposal would preserve the significance (via change in the setting) of designated and non-designated heritage assets and an appreciation of them.

459. Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate co-living housing, which would increase housing stock and housing choice for Londoners. The proposals align with the function of the City to accommodate substantial growth in accordance the relevant policies.

460. The proposed development would have some minor and major adverse impacts upon daylight and sunlight to surrounding residential properties, however considering the majority of adversely impacted windows are bedrooms, the existing poor daylighting factors, and the fact this is a tight knit urban environment, in this case officers consider the amenity impacts to be acceptable when considered on balance with the other merits of the application. Concerns relating to noise and disturbance arising from the proposed use would be controlled through several conditions and the operational management plan, which would be secured through a Section 106 agreement.

461. The impact upon air quality, wildlife and ecology is considered to be acceptable, in line with relevant policies, subject to the recommended conditions.

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

APPENDIX A: BACKGROUND PAPERS

Plan titled:

Received 20 August 2024:
Proposed Ground Floor Plan: 22107-AHMM-XX-GF-DR-A-PL120 Rev.P05
Proposed South Elevation: 22107-AHMM-XX-XX-DR-A-PL220 Rev.P02

Received 2 August 2024:
Basement Plan Rooms Layout: 10460-IRB-XX-B1-D-M-5001 Rev.P01

Received 9 July 2024:
Proposed West Elevation: 22107-AHMM-XX-XX-DR-A-PL222 Rev.P02

Received 1 May 2024:
Proposed Level 02 Floor Plan: 22107-AHMM-XX-02-DR-A-PL122 Rev.P01
Proposed Roof Plan: 22107-AHMM-XX-RF-DR-A-PL126 Rev.P01
Proposed Level 03-05 Floor Plan: 22107-AHMM-XX-ZZ-DR-A-PL127
Proposed Section AA: 22107-AHMM-XX-XX-DR-A-PL320 Rev.P01
Proposed Section BB: 22107-AHMM-XX-XX-DR-A-PL321 Rev.P01
Proposed Section CC: 22108-AHMM-XX-XX-DR-A-PL322
Proposed Section DD: 22109-AHMM-XX-XX-DR-A-PL323
Proposed Section EE: 22110-AHMM-XX-XX-DR-A-PL324
Proposed East Elevation: 22107-AHMM-XX-XX-DR-A-PL221 Rev.P01
Proposed North Elevation: 22107-AHMM-XX-XX-DR-A-PL223 Rev.P01
Core Plan Layout – typical level: 22170-AHMM-A-SK089
Public Realm Plan: EAS-ZZ-DR-L-002
Courtyard Plan: EAS-ZZ-DR-L-002
Roof Terrace Plan: EAS-ZZ-DR-L-003
Planting Plan: EAS-ZZ-DR-L-004

Key Plan: 22107-AHMM-XX-RF-DR-A-PL150
Existing West Elevation: 22107-AHMM-XX-XX-DR-A-PL202 Rev.P01
Demolition West Elevation: 22107-AHMM-XX-XX-DR-A-PL212 Rev.P01

Received 19 February 2024:

Proposed Site Plan: 22107-AHMM-XX-RF-DR-A-PL003 Rev.P01
Site Location Plan: 22107-AHMM-XX-RF-DR-A-PL004
Proposed Basement Plan: 22107-AHMM-XX-B1-DR-A-PL092
Proposed Level 01 Floor Plan: 22107-AHMM-XX-01-DR-A-PL121
Proposed Level 06-07 Floor Plan: 22107-AHMM-XX-01-DR-A-PL123
Proposed Level 08 Floor Plan: 22107-AHMM-XX-01-DR-A-PL124
Proposed Level 09 Floor Plan: 22107-AHMM-XX-01-DR-A-PL125
Bay Study Base: 22107-AHMM-XX-XX-DR-A-PL250

Bay Study Top: 22107-AHMM-XX-XX-DR-A-PL251
Unit Layout Type 01 and Type 02 M4: 22107-AHMM-XX-ZZ-DR-A-PL400
Unit Layout Type 03 M4: 22107-AHMM-XX-ZZ-DR-A-PL401
Unit Layout Type 04 and Type 05 M4: 22107-AHMM-XX-ZZ-DR-A-PL402
Unit Layout Type 06 M4: 22107-AHMM-XX-ZZ-DR-A-PL403
Accessible Unit Type 01 M4: 22107-AHMM-XX-ZZ-DR-A-PL404
Accessible Unit Type 02 M4: 22107-AHMM-XX-ZZ-DR-A-PL405
Accommodation Schedule: 22107-AHMM-XX-XX-SC-A-PL900 Rev.P07
Existing Block Plan: 22107-AHMM-XX-RF-DR-A-PL001
Existing Site Plan: 22107-AHMM-XX-RF-DR-A-PL002
Existing Basement Plan: 22107-AHMM-XX-B1-DR-A-PL090
Existing Ground Floor Plan: 22107-AHMM-XX-GF-DR-A-PL100
Existing Level 01 Floor Plan: 22107-AHMM-XX-01-DR-A-PL101
Existing Level 02 Floor Plan: 22107-AHMM-XX-01-DR-A-PL102
Existing Level 03 Floor Plan: 22107-AHMM-XX-01-DR-A-PL103
Existing Level 04 Floor Plan: 22107-AHMM-XX-01-DR-A-PL104
Existing Level 05 Floor Plan: 22107-AHMM-XX-01-DR-A-PL105
Existing Level 06 Floor Plan: 22107-AHMM-XX-01-DR-A-PL106
Existing Level 07 Floor Plan: 22107-AHMM-XX-01-DR-A-PL107
Existing Roof Plan: 22107-AHMM-XX-RF-DR-A-PL108
Existing Section AA: 22107-AHMM-XX-XX-DR-A-PL300
Existing Section BB: 22107-AHMM-XX-XX-DR-A-PL301
Existing South Elevation: 22107-AHMM-XX-XX-DR-A-PL200
Existing East Elevation: 22107-AHMM-XX-XX-DR-A-PL201
Existing North Elevation: 22107-AHMM-XX-XX-DR-A-PL203
Demolition Basement: 22107-AHMM-XX-B1-DR-A-PL091
Demolition Ground Floor Plan: 22107-AHMM-XX-GF-DR-A-PL110
Demolition Level 01: 22107-AHMM-XX-01-DR-A-PL111
Demolition Level 02: 22107-AHMM-XX-01-DR-A-PL112
Demolition Level 03: 22107-AHMM-XX-01-DR-A-PL113
Demolition Level 04: 22107-AHMM-XX-01-DR-A-PL114
Demolition Level 05: 22107-AHMM-XX-01-DR-A-PL115
Demolition Level 06: 22107-AHMM-XX-01-DR-A-PL116
Demolition Level 07: 22107-AHMM-XX-01-DR-A-PL117
Demolition Level 08: 22107-AHMM-XX-01-DR-A-PL118
Demolition Section AA: 22107-AHMM-XX-XX-DR-A-PL310
Demolition Section BB: 22107-AHMM-XX-XX-DR-A-PL311
Demolition South Elevation: 22107-AHMM-XX-XX-DR-A-PL210
Demolition East Elevation: 22107-AHMM-XX-XX-DR-A-PL211
Demolition North Elevation: 22107-AHMM-XX-XX-DR-A-PL213

Document titled:

Design and Access Statement (AHMM, January 2024)

Design and Access Statement Addendum #2 (AHMM, August 2024)
Planning Statement (DP9, February 2024)
Transport Statement (Markides Associates, February 2024)
Transport Statement Addendum (Markides Associates, 20 August 2024)
Swept Path Analysis Large Car: 23232-MA-XX-XX-DR-C-7011 Rev.P01
Outline Construction Logistics Plan (Markides Associates, February 2024)
Draft Delivery and Servicing Plan (Markides Associates, February 2024)
Daylight and Sunlight to Neighbouring Properties (Anstey Horne, February 2024)
Daylight and Sunlight to Proposed Accommodation (Anstey Horne, February 2024)
Review of Daylight and Sunlight Assessments (BRE, July 2024)
Stage 2 WLCA Report (Circle, January 2024)
Sustainable Design and Construction Statement (Introba, February 2024)
Energy Strategy Report (Introba, February 2024)
Energy Technical Note Issue 2.0 (Introba, 12 August 2024);
Energy Performance Certificate 45 Beech Street dated 23 July 2024;
Carbon Optioneering Supporting Note dated 8 August 2024;
Carbon Options Tool (Hilson Moran)
Carbon Options Tool Dashboard (Hilson Moran)
Circular Economy Statement (Scotch Partners, January 2024)
Air Quality Assessment (Air Quality Consultants, January 2024)
Statement of Community Involvement (London Communications Agency, February 2024)
Preliminary Ecological Appraisal and BNG (ITPEnergised, February 2024)
Bat Emergence Interim Report (Maydencroft, July 2024)
Bat Emergence Survey Report (Maydencroft, August 2024)
Heritage, Townscape & Visual Impact Assessment (The Townscape Consultancy, February 2024)
Financial Viability Assessment (DS2, January 2024)
Review of ‘Viability Report’ (BNP, March 2024)
Payment in-lieu of affordable housing letter (DS2, November 2023)
Payment in-lieu of affordable housing letter (DS2, May 2024)
Review of payment in-lieu of affordable housing (BNP, March 2024)
Further response to review of payment in-lieu of affordable housing (BNP, June 2024)
Fire Statement London Plan (Artec Fire, January 2024)
Fire Statement Gateway One Rev.01 (Artec Fire, February 2024)
Drainage Strategy Report (Whitby Wood, February 2024)
Response to LLFA Technical Note (Whitby Wood, 1 May 2024)
Flood Risk Assessment (Whitby Wood, February 2024)
Draft Delivery and Servicing Plan (Markides Associates, February 2024)
Noise and Vibration Assessment (Format, February 2024)
Draft Co-Living Operational Management Plan (HubCap, February 2024)

List of neighbouring objections 24/00176/FULL

- Fred Rodgers
- Dr Henry Irwig
- Ms WahFong Dart
- Dr Robin Callender Smith
- Mrs Jill Jones
- Mr Simon Ricketts
- Mr Simon Martner
- Mr Christopher Makin
- Dr Jane Bickerton
- Dr Stephen Lubell
- Mr John Taysum
- Mark Ormrod
- Jeff Hennessey
- Ms Mary Gilchrist
- Helen Sachs
- Mr Richard Walter
- Mrs Alexander Wilson
- Mary Gilchrist
- Dr Alexander Wilson
- Dr Alexander Wilson
- Mr Alex Castle
- Ms Elizabeth Fothringham
- Ms Helena Twist
- Miss Rebecca Smithers
- Mr Duncan Finch
- Dr Jane Bickerton
- Mr Stephen Chapman
- Mr Stephen Chapman
- Mr Frank Boait
- Mr Frank Boait
- Ms Candace Gillies-Wright
- Mr Scott Palmer
- Mr William Davy
- Gaby Robertshaw
- Ben Jonson House Group
- Stephen Chapman
- Mrs Sandra Fryer
- Fred Rodgers
- Mr Roy Sully
- Miss Frances Northall

- M H Gadsden
- Christopher Gadsden
- Mrs Helen Clifford
- Mrs Sarah Mann
- Mr Philip Ellaway
- Dr David North
- Ms Dulce Merritt
- Mr Adrian Tanovic
- Dr Martin Farebrother
- Helena Twist
- Dr Harf Zatschler
- Mr Dean Wybrow
- Dr Gina Barnes
- Mr Gary Mclean
- Dr Garth Leder
- Dr Benjamin Mohamed
- Mr Frank Smith
- Ben Jonson House Group Committee
- Dr Jane Bickerton
- Ben Jonson House Group Committee
- Stephen Chapman
- Mr Kevin Wallace Rogers
- Mr Alex Castle
- Mr Pankaj Shah
- Mr Douglas Bevans

List of Statutory or Other Consultee Responses

- Air Quality Officer
- Historic England
- Environmental Health Officer
- Health and Safety Executive
- Community Facilities Manager (Public Conveniences)
- Environmental Resilience Officer
- Thames Water
- Thames Water
- Health and Safety Executive
- Barbican Association

- Barbican and Golden Lane Neighbourhood Forum
- Planning Obligations
- Lead Local Flood Authority
- Lead Local Flood Authority
- Air Quality Officer
- Environmental Health Officer
- The Gardens Trust
- Environmental Health

APPENDIX B: Relevant Policies of the Development Plan

Relevant London Plan Policies

Policy GG1 Building strong and inclusive communities

Policy GG2 Making the best use of land

Policy GG3 Creating a Healthy City

Policy GG4 Delivering the homes Londoners need

Policy GG5 Growing a good economy

Policy SD4 The Central Activities Zone (CAZ)

Policy D3 Optimising site capacity through the design-led approach

Policy D4 Delivering Good Design

Policy D5 Inclusive design

Policy D7 Accessible housing

Policy D11 Safety, security and resilience to emergency

Policy D12 Fire safety

Policy D14 Noise

Policy H1 Increasing housing supply

Policy H4 Delivering affordable housing

Policy H5 Threshold approach to applications

Policy H16 Large-scale purpose-built shared living

Policy HC1 Heritage conservation and growth

Policy HC3 Strategic and Local Views

Policy HC4 London View Management Framework

Policy G5 Urban greening

Policy G6 Biodiversity and access to nature

Policy SI 1 Improving air quality

Policy SI 2 Minimising greenhouse gas emissions

Policy SI 7 Reducing waste and supporting the circular economy

Policy SI 13 Sustainable drainage

Policy T4 Assessing and mitigating transport impacts

Policy T5 Cycling

Policy T6.1 Residential parking

Policy T7 Deliveries, servicing and construction

Policy DF1 Delivery of the Plan and Planning Obligations

Relevant Local Plan Policies

CS1 Offices

DM 1.1 Protection of office accommodation

CS4 Planning Contributions

CS10 Design

DM 10.3 Roof gardens and terraces

DM 10.4 Environmental enhancement

DM 10.7 Daylight and sunlight

CS12 Historic Environment

DM 12.1 Managing change affecting all heritage assets and spaces

DM 12.5 Historic parks and gardens

CS15 Sustainable Development and Climate Change

DM 15.1 Sustainability requirements

DM 15.2 Energy and CO2 emissions assessments

DM 15.3 Low and zero carbon technologies

DM 15.4 Offsetting of carbon emissions

DM 15.5 Climate change resilience and adaptation

DM 15.6 Air quality

DM 15.7 Noise and light pollution

CS16 Public Transport, Streets and Walkways

DM 16.1 Transport impacts of development

DM 16.2 Pedestrian movement

DM 16.3 Cycle parking

DM 16.4 Facilities to encourage active travel

DM 16.5 Parking and servicing standards

DM 17.1 Provision for waste in development schemes

DM 17.2 Designing out construction waste

DM 19.2 Biodiversity and urban greening

CS21 Housing

DM 21.1 Location of new housing

DM 21.2 Loss of housing

DM 21.3 Residential environment

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

Barbican and Golden Lane Estates Conservation Area Appraisal (2022);

Protected Views SPD (January 2012)

City of London Biodiversity Action Plan (2021)

Relevant Draft City Plan 2040 Policies

Strategic Policy S1: Healthy and Inclusive City

Policy HL1: Inclusive buildings and spaces

Policy HL2: Air quality

Policy HL3: Noise

Strategic Policy S3: Housing

Policy HS1: Location of New Housing

Policy HS3: Residential environment

Policy HS4: Housing quality standards

Strategic Policy S8: Design

Policy DE1: Sustainable Design

Policy DE2: Design Quality

Policy DE7: Daylight and sunlight

Policy DE8: Lighting

Policy VT1: The impacts of development on transport

Policy VT3: Vehicle Parking

Policy AT2: Active Travel including Cycling

Policy AT3: Cycle Parking

Strategic Policy S13: Protected Views

Policy OS2: Urban Greening

Policy OS3: Biodiversity

Policy OS4: Biodiversity Net Gain

Strategic Policy S15: Climate Resilience and Flood Risk

Policy CR3: Sustainable drainage systems (SuDS)

Strategic Policy S16: Circular Economy and Waste

Strategic Policy S23 Smithfield and The Barbican

SCHEDULE: CONDITIONS

	Pre-Commencement Conditions
1.	**Time Limit** The development hereby permitted shall be begun before the expiration of three years from the date of this permission. REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990
2.	**Construction scheme of protective works** There shall be no deconstruction or 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.
3.	**SUDS Design** 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 capacity 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. 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.
4.	**Rain and Greywater Harvesting Details** Prior to the commencement of the development, details of the rainwater harvesting and greywater collection systems that can be included into the detailed design, to include the location of tanks and areas/locations of use for the collected water, shall be submitted to and approved in writing by the Local Planning Authority. REASON: To assist the environmental sustainability of the development and its resilience and adaptation to climate change in accordance with the following policies of the Local Plan: CS15, DM15.1, DM15.5.
5.	**Site Condition Survey** Prior to the commencement of works including demolition, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority. Proposed finished floor levels at basement and threshold ground floor (threshold review) levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces, must be submitted and agreed with the Highways Authority. The development shall be carried out in accordance with the approved levels unless otherwise agreed in writing by the local planning authority. REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

6.	**Non-Road Mobile Machinery Registration** 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.
7.	**Demolition and Construction Logistics** Prior to the commencement of works including demolition, a Demolition and Construction Logistics Plan to manage all freight vehicle movements to and from the site during works related to the development has been submitted to and approved in writing by the Local Planning Authority. The Demolition and Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Demolition and Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority. REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.
8.	**Thames Water – No construction within 5m of water main** 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, prior to the commencement of works. 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.
9.	**Details of Lifts** Prior to commencement of the new structural core, details of the proposed lifts shall be submitted to and approved in writing by the local planning authority. The development shall then be implemented in accordance with the approved details and be retained as such in perpetuity. REASON: To ensure that the development will be accessible for disabled people in accordance with the following policy of the Local Plan: DM10.8. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
10.	**Circular Economy** Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, an update to the approved detailed Circular Economy Statement to reaffirm the proposed strategy, to include a site waste management plan, shall be submitted to and approved in writing the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of the new building elements and of the interventions in order to distinguish the historic from the new fabric. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the life-cycle of the development. REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plans and

	draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2040; S16.
11.	**Post construction circular economy statement** No later than 3 months after completion of the building and prior to the development being occupied, a post-construction Circular Economy Statement shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development. REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.
12.	**Detailed Whole Life-Cycle Carbon Assessment** Prior to the commencement of the development, excluding demolition and below-ground works of the development a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the whole life-cycle carbon emissions savings for modules A1 – A5 of the development achieve at least the GLA standard benchmark and setting out further opportunities to achieve the GLA's aspirational benchmarks set out in the GLA's Whole Life-Cycle Carbon Assessment Guidance, and that modules B – C of the development aim to achieve at least the GLA standard benchmark. The assessment should include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life-Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life cycle of the development. REASON: To ensure that the GLA and the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2040: DE 1.
13.	**Post construction whole life-cycle carbon assessment** Once the as-built design has been completed (upon commencement of RIBA Stage 6) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon

	emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed. REASON: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.
14.	**Operational carbon emissions** Prior to the commencement of development, excluding demolition, an updated Energy Assessment confirming the detailed design stage opportunities for operational carbon reduction from the building to futureproof the development for low carbon operation, and CIBSE TM54 analysis of regulated and unregulated energy requirements is required to be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved Energy Assessment and the carbon reduction measures contained with the approved Energy Assessment shall remain in place for the lifetime of the development. REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2. Draft City Plan 2040, DE1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.
15.	**Energy Network connection** The development shall be connected to the local district heating network to supply the heating and cooling needs of the site. Any waste heat generated by the plant in the building will be transferred to the local district heating network where it can be utilised. REASON: To minimise carbon emissions by enabling the site to be connected to a district heating and cooling network in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4; draft City Plan 2040: DE1
16.	**Post construction BREEAM** A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all

	reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion. REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2, draft City Plan 2040; DE1
17.	**Rainwater harvesting** Before any construction works hereby permitted are begun details of rainwater harvesting systems, to include the location of tanks and areas/locations of use for the collected water, shall be submitted to and approved in writing by the local planning authority. REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18 . City Plan 2040: DE3. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
18.	**Post construction UGF and BNG** Within 6 months of completion details of the measures to meet the approved Urban Greening Factor and the Biodiversity Net Gain scores, to include plant and habitat species, scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2040 policy OS2 City Greening and OS3 Biodiversity.
19.	**Green Roof** Details of the position and size of the green roof(s), the type of planting and the contribution of the green roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority. REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
20.	**Climate Change Resilience Sustainability Statement** Prior to the commencement of the development, excluding demolition, a Climate Change Resilience Sustainability Statement (CCRSS) shall be

	submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development. REASON: To comply with Local Plan Policy DM 15.5 for Climate change resilience and adaptation and draft City Plan 2040: S15.
21.	**Ecological Management Plan** Prior to the commencement of the development, excluding demolition, an Ecological Management Plan shall be submitted to the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations and management. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2040 policy OS3 Biodiversity.
22.	**Façade details (embodied carbon)** Prior to the commencement of façade construction, details of the façade system confirming the detailed design in relation to reducing the embodied carbon impact and waste across all life-cycle stages that would result from the proposed facade types, materials, construction method and replacement cycles, is required to be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved drawings. REASON: To demonstrate that embodied carbon emissions have been minimised and that the development is sustainable in accordance with the Local Plan policies: CS15, DM15.1, DM15.2 and Draft City Plan 2040 policies DE1 and CE1.
23.	**Signage and Wayfinding**

	Prior to occupation, an inclusive signage and wayfinding strategy, highlighting and signposting destinations, accessible routes and facilities, cycle parking and any other relevant uses shall be submitted to and approved in writing by the Local Planning Authority. REASON: To support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4.
	Prior to completion of shell and core conditions
24.	**SuDS and SuDS Maintenance** 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.
	"Prior to commencement of relevant works" conditions
25.	**Plant Noise details and restriction** (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
26.	**Acoustic report submission** 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.
27.	**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.
28.	**Mechanical Plant details**

	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.
29.	**Backup / emergency Generator details** 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.
30.	**Lighting Strategy** Prior to the commencement of the relevant works, a Lighting Strategy and a Technical Lighting Design for all internal and external lighting 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.
31.	**Details of street lighting installation** 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
32.	**Detailed Design and Materials** Before any works thereby affected are begun, the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: a. particulars and samples of the materials to be used on all external faces of the building including details of compliance with the approved Circular Economy Strategy; b. construction of 1:1 sample material and facade panels of agreed sections of the facades; c. detailed drawings of a scale no less than 1:20, in plan, section and elevation of agreed typical bays, including agreed typical bays including reference to materials, finishes, lighting, details of jointing and any necessary expansion/movement joints;

	d. details of all new ground and first-floor elevations including all entrances, soffits, columns, integrated art panels, and information boards; e. full details of terraces, including all elevations, entrances, fenestration, planters, seating, lighting, soffits, drainage, and any infrastructure required; f. full details of arched roofs, including all elevations, entrances, fenestration, lighting, soffits, downpipes and any infrastructure required; g. details of walls, railings, balustrades, ramps, gates, screens, handrails etc, bounding or within the site; h. details of the integration of building cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room; i. details of all new service vehicles, fire escape and cycle store entrances; j. details of access to the roof for cleaning and maintenance, including details of mansafe equipment; k. Notwithstanding the approved drawings, full details of the rooftop including any plant equipment, integration of M&E and building services and railings; l. details of the removal, storage and reinstatement within the development of the Murry House mural; REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2 and emerging policies DE2, DE6 and HE1 of the Draft City Plan 2040.
33.	**Hard and soft landscaping details** (A). Before works thereby affected are begun the following details, relating to all unbuilt surfaces, including terraces/balconies and public realm, shall be submitted to and approved in writing by the Local

	Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: a) Details of all soft landscaping, including the position, size and types of all planting and details of their respective planting beds and their contribution to biodiversity and inclusivity; b) Details of all proposed trees including details of their age, growing habit, girth of trunk, root development, clear stem heights; and details of tree pits/trenches and growing medium; c) Details of provisions for harvesting d) Details of all SUDS infrastructure, including details on the provision for harvesting rainwater run-off from surfaces to supplement; e) Details of all urban furniture, including planters; seating; refuse bins; biodiversity habitat; f) Details of all hard landscaping materials, including paving details and samples, in accordance with the City Public Realm Technical Manual; g) Details of landscape lighting h) Details of biodiverse green roofs, i) A management and maintenance Plan (including ecological management) for all proposed landscaping. (B). All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.
34.	**Accessible Parking Design and Management Plan** One accessible parking space shall be provided on the site. Before any works thereby affected are begun, an Accessible Parking Management Plan setting out the details of the layout and the arrangement of the proposed on-site accessible parking space, shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved. This shall include details of: • Electric Vehicle Charging Point (EVCP) for the disabled car parking space

	• Levels within the car parking area, include visibility splays and vehicle circulatory movements, provide clear and unobstructed headroom. • Details of access to the space, including gate control, and how this would ensure 'No waiting on the public highway'. • Health & Safety audit and risk assessment for the disabled user of the car parking space. • Allocation criteria for the disabled car parking space, • Details of any booking system for the space, keeping records and managing the demand, • Monitoring the use, including non-compliance/ enforcement. • Details of any directional or wayfinding signage required REASON: To ensure the development proposals provides a fully accessible and inclusive facility and the management of the parking is satisfactory and safe, in accordance with Policies DM10.8, DM16.1 and DM16.5 of the Local Plan and Policy D5 and T6 of the London Plan.
35.	**<u>Accessibility and Inclusivity details</u>** Before any works thereby affected are begun, the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: a. Details of all surface materials including slip resistance, contrast, glare analysis, colour and texture as appropriate; b. Details of an inclusive entrance strategy for all entrances including siting of controlled entry system, design of the manifestation, thresholds, mat wells and floor finishes, and door furniture at a scale of no less than 1:20; c. Details of the cycle stand types and setting out of long stay cycle spaces, including swept paths , and end of trip facilities and access routes; d. details of residential reception; e. Details of typical accessible room furniture layouts at a scale no less than 1:20; f. Planting to all communal amenity spaces and balconies including path widths and seating and demonstrating how unwelcome touch and scent can be avoided; REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan
36.	**<u>Inclusive Access Management Plan</u>** Prior to the occupation of the development, an Access Management Plan shall be submitted to and approved in writing by the Local

	Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for: (1) Website information including photos and an easy read version with information on: a) Travel distances in metres from key step-free points of arrival including identified rest points at intervals of no more than 50m b) Location of dropped kerbs c) Facilities available on-site including dimensions and photos for (as appropriate): i. entrances and lift access ii. controlled entry points iii. accessible toilets including protocol for access to Radar key if applicable iv. facilities for assistance animals v. assistive listening system and other assistive technology vi. rest and recovery facilities/quiet room vii. room for reflection/prayer room viii. location of accessible communal facilities (2) Inclusive Entrances Strategy: The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development. REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.
37.	**<u>Cycle Parking Management Plan</u>** Before any works thereby affected are begun, a Cycle Parking Management Plan setting out the details of the layout and the arrangement of the long stay and short stay cycle parking, at no less than shown on the approved drawings unless agreed in writing by the Local Planning Authority, as well as security and access arrangements

	including a wayfinding strategy, shall be submitted to and approved in writing by the Local Planning Authority. The cycle parking arrangements detailed in the approved Cycle Management Plan shall thereafter be maintained in accordance with the approved Plan for the life of the building unless otherwise agreed in writing with the Local Planning Authority. The cycle parking provided on the site must remain ancillary to the use of the building and must be available for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking. REASON: To ensure the cycle parking is accessible and has regard to compliance with the London Cycling Design Standards in accordance with the following policy of the Local Plan: DM16.3 and London Plan Policy T5.
38.	**Refuse and Recycling Details** Notwithstanding the refuse collection and storage facilities shown on the drawings hereby approved, full details of these facilities, including storage and collection protocol and who is responsible for this, shall be submitted to and approved in writing by the Local Planning Authority, prior to commencement of the relevant works. The approved facilities shall thereafter be provided and maintained in accordance with BS5906 Specifications throughout the life of the building for the use of all the occupiers. REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.
	Prior to Occupation Conditions
39.	**Residential noise levels and testing** (a) All residential premises in the development shall be designed and constructed to attain the following internal noise levels: • Bedrooms- 30dB LAeq,T* and 45dB LAmax • Living rooms- 30dB LAeq, T* • *T- Night-time 8 hours between 23:00-07:00 and daytime 16 hours between 07:00-23:00. (b) 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.
40.	**Delivery and Servicing** Details of a Delivery and Servicing Management Plan demonstrating the arrangements for control of the arrival and departure of vehicles servicing the premises shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. The building facilities shall thereafter be operated in accordance with the approved Delivery and Servicing Management Plan (or any amended Servicing Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the building. REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: DM16.1.
41.	**Thames Water Upgrades confirmation** 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.
	Compliance conditions
42.	**No Audible Music Outside Premises** 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.

43.	**No Music on External Amenity Areas** No amplified or other music shall be played on the 9th floor terrace or courtyard 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.
44.	**Servicing Hours Restriction (amenity)** No servicing of the premises shall be carried out between the hours of (i) 23:00 on one day and 07:00on the following from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays; or (ii) 07:00hrs and 09:00hrs, 12:00hrs and 14:00hrs, 16:00hrs and 19:00hrs, Mondays to Fridays. 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
45.	**External amenity restriction hours** (a) The roof terrace on level 9 hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 07:00 on the following day, other than in the case of emergency. (b) Between the hours of 22:00 on one day and 07:00 on the following day, the courtyard external amenity area shall not be used other than for access or emergency purposes, and shall not be used for gathering or socialising. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
46.	**Control of Odour & Noise from Commercial Kitchen Extract Systems** All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on

	site and upon request provided to the Local Planning Authority to demonstrate compliance. Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3
47.	**Level Thresholds** The threshold of the private public realm and public route entrances shall be at the same level as the rear of the adjoining footway. REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
48.	**Approved Plans** The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: *Received 20 August 2024:* Proposed Ground Floor Plan: 22107-AHMM-XX-GF-DR-A-PL120 Rev.P05 Proposed South Elevation: 22107-AHMM-XX-XX-DR-A-PL220 Rev.P02 *Received 2 August 2024:* Basement Plan Rooms Layout: 10460-IRB-XX-B1-D-M-5001 Rev.P01 *Received 9 July 2024:* Proposed West Elevation: 22107-AHMM-XX-XX-DR-A-PL222 Rev.P02 *Received 1 May 2024:* Proposed Level 02 Floor Plan: 22107-AHMM-XX-02-DR-A-PL122 Rev.P01 Proposed Roof Plan: 22107-AHMM-XX-RF-DR-A-PL126 Rev.P01 Proposed Level 03-05 Floor Plan: 22107-AHMM-XX-ZZ-DR-A-PL127 Proposed Section AA: 22107-AHMM-XX-XX-DR-A-PL320 Rev.P01 Proposed Section BB: 22107-AHMM-XX-XX-DR-A-PL321 Rev.P01 Proposed Section CC: 22108-AHMM-XX-XX-DR-A-PL322 Proposed Section DD: 22109-AHMM-XX-XX-DR-A-PL323 Proposed Section EE: 22110-AHMM-XX-XX-DR-A-PL324 Proposed East Elevation: 22107-AHMM-XX-XX-DR-A-PL221 Rev.P01 Proposed North Elevation: 22107-AHMM-XX-XX-DR-A-PL223 Rev.P01 Core Plan Layout – typical level: 22170-AHMM-A-SK089 Public Realm Plan: EAS-ZZ-DR-L-002 Courtyard Plan: EAS-ZZ-DR-L-002 Roof Terrace Plan: EAS-ZZ-DR-L-003

	Planting Plan: EAS-ZZ-DR-L-004 *Received 19 February 2024:* Proposed Site Plan: 22107-AHMM-XX-RF-DR-A-PL003 Rev.P01 Site Location Plan: 22107-AHMM-XX-RF-DR-A-PL004 Proposed Basement Plan: 22107-AHMM-XX-B1-DR-A-PL092 Proposed Level 01 Floor Plan: 22107-AHMM-XX-01-DR-A-PL121 Proposed Level 06-07 Floor Plan: 22107-AHMM-XX-01-DR-A-PL123 Proposed Level 08 Floor Plan: 22107-AHMM-XX-01-DR-A-PL124 Proposed Level 09 Floor Plan: 22107-AHMM-XX-01-DR-A-PL125 Bay Study Base: 22107-AHMM-XX-XX-DR-A-PL250 Bay Study Top: 22107-AHMM-XX-XX-DR-A-PL251 Unit Layout Type 01 and Type 02 M4: 22107-AHMM-XX-ZZ-DR-A-PL400 Unit Layout Type 03 M4: 22107-AHMM-XX-ZZ-DR-A-PL401 Unit Layout Type 04 and Type 05 M4: 22107-AHMM-XX-ZZ-DR-A-PL402 Unit Layout Type 06 M4: 22107-AHMM-XX-ZZ-DR-A-PL403 Accessible Unit Type 01 M4: 22107-AHMM-XX-ZZ-DR-A-PL404 Accessible Unit Type 02 M4: 22107-AHMM-XX-ZZ-DR-A-PL405 REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

Informatives:

1.	**NPPF** In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways: • detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available; • a full pre application advice service has been offered; • where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.
2.	**Consult Environmental Department**

	The Department of the Built Environment (Transportation & Public Realm Division) must be consulted on the following matters which require specific approval: (a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme. (b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the Department of the Built Environment Transportation and Public Realm Division is recommended to ensure the design of the building provides for the inclusion of street lighting. (c) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway). You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. Please contact the Corporate Property Officer, City Surveyor's Department. (d) Bridges over highways (e) Permanent Highway Stopping-Up Orders and dedication of land for highway purposes. (f) Declaration, alteration and discontinuance of City and Riverside Walkways. (g) The provision of City Walkway drainage facilities and maintenance arrangements thereof. (h) Connections to the local sewerage and surface water system. (i) Carriageway crossovers. (j) Servicing arrangements, which must be in accordance with the City of London Corporation's guide specifying "Standard Highway and Servicing Requirements for Development in the City of London".
3.	**Roof Gardens** The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof

	e.g. from gas boilers / generators / CHP. In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.
4.	**Ventilation** Ventilation for any kitchens will need to be provided to roof level. Planning permission will be required for any ducts, vents or plant that would materially affect the external appearance of the building. It cannot be assumed that ductwork will be permitted on the exterior of the building.
5.	**Crime Prevention** The Crime Prevention Design Advisor for the City of London Police should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.
6.	**Right to light** This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.
7.	**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.
8.	**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)

9.	**Highway works** Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.
10.	**Access and inclusivity** Access for disabled people is a material consideration in the determination of planning applications. The City of London's Access Advisor has assessed the planning application to ensure that the proposal meets the highest standards of accessibility and inclusive design required by London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and Draft City Plan 2046 Policy HL1. The Access Advisor promotes good practice standards of inclusive design and encourages early consideration of accessibility in the design process so that a truly inclusive environment can be achieved that everyone will be able to visit, use and enjoy. Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.
11.	**CIL** The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019. The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone: • Office 185GBP per sq.m • Retail 165GBP per sq.m • Hotel 140GBP per sq.m • All other uses 80GBP per sq.m These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created. The City of London Community Infrastructure Levy is set at a rate of 75GBP per sq.m for offices, 150GBP per sq.m for Riverside Residential, 95GBP per sq.m for Rest of City Residential and 75GBP for all other uses. The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted.

	The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City. Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil). Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.
12.	***Thames Water informatives*** Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. There are 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-yourdevelopment/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. 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 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. Please see Thames Water 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