

45 Beech Street

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## **Representations**

An additional late representation was received from a member of the public since the publication of the first Addendum (published on 6 September 2024). The representation is appended in full to this addendum.

Issues raised include fire safety; the possibility of road closures resulting from the Barbican, Bunhill and Golden Lane Healthy Neighbourhood Plan and how this would impact servicing of the development; suitability of the location for a café; number of tenants per room; affordable housing payment in lieu query; loss of office query; embodied carbon of the proposed roof design; design and heritage impact assessment queries; noise and disturbance from refuse collection arrangements. Spelling, grammar and stylistic issues have been raised.

### *Fire Safety*

Fire safety is addressed in the report from paragraph 297. For clarity as the work is for a “Higher Risk Building” as defined by Building Safety Act 2022, the approving authority is the Building Safety Regulator and the proposal will need to go through Gateways 2 & 3 for approval. The proposals under Gateway 1 have been agreed by the Health and Safety Executive / Building Safety Regulator, in relation to land use to the extent it affects land use planning considerations. However, they have also given a steer on a number of items that the design team will need demonstrate compliance to gain approval at these stages.

For accessible units, the evacuation strategy must demonstrate adequate means of escape and the design team will need to fully demonstrate adequate Means of escape at Gateway 2. The comments by the HSE will need to be addressed before Gateway 2 when the applicant submits to the Building Safety Regulator.

As per the conclusion of the committee report the proposal is considered to be acceptable with regards to fire safety for the purposes of the current planning application.

### *Impact of possible road closures resulting from the Barbican, Bunhill and Golden Lane Healthy Neighbourhood Plan on servicing*

Delivery and servicing is to be secured by condition 40. Officers can only consider the situation as it is now when determining the acceptability of the proposed servicing arrangements, and as this is conditioned it is subject to change at later design stages. Should the mentioned road closures become a reality before this condition is discharged, then alternative delivery arrangements would need to be considered and agreed between transport officers and the developer.

### *Number of tenants per room*

Paragraph 116 of the report confirms there would be an obligation within the Section 106 agreement to ensure each room could only be occupied by a single tenant. This would be secured under the Co-Living Accommodation (Operational Management Plan Head of Terms).

### *Affordable Housing*

The affordable housing issues are addressed in full in the officer report from paragraph 129. The proposal is policy compliant in this respect, and this element of the application has been reviewed by a third party.

*Loss of office*

The loss of the existing office floorspace is addressed from paragraph 60 of the report and is considered acceptable.

*Embodied carbon in roof*

The overall whole life-cycle carbon emission impact of the development is considered to be acceptable, as discussed from paragraph 154. The roof design is considered to be acceptable as discussed from paragraph 252.

*Design*

Officers have responded to the design points raised by the objector below, and numbered these to correspond with the objector's letter (refer to appendix for full objection):

**No. 5**

The café would add animation to the ground floor corner of the building, and through additional clear glazing, make it feel more welcoming and open, thereby enhancing the character of this section of the tunnel, which is a key pedestrian route.

**No. 11**

Officers have addressed the impact of the development in terms of carbon within paragraphs 182-184 of the report.

The contribution of the roofscape to the building, its local townscape, and its impact on surrounding designated and non-designated heritage assets is set out within paragraphs 220-223 and 252 of the report. Officers conclude that 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.

**No. 14**

The proposed extensions would result in a building of an *equivalent*, or *commensurate*, height and scale to its neighbours, including Bryer Court, Ben Jonson House and Bridgewater House. Overall, as concluded in paragraph 230, the proposal would be compatible with the existing context.

**No.17**

The Historic England criteria for identifying non-designated heritage assets (within Advice Note 7 on Local Heritage Listing) are identified within paragraph 236 of the report. An assessment of the existing building against these criteria is found within paragraphs 237-241 of the report.

**No. 18**

Officers have made a full assessment of the design of the roofscape and its impact on the relationship to the Barbican, against design and heritage Policies CS10.3 and CS12.1, through paragraphs 201 – 269 of the report. A full heritage and townscape and visual impact assessment has been produced, which illustrates the visibility of the proposals, and the relationship of the proposed development to neighbouring buildings. Officers do not consider the proposals to result in any harm to nearby Listed buildings and conclude that the design of the building, and its roofscape is acceptable.

**No.20**

Officers do not consider Bridgewater House to be of sufficient interest to be identified as a Non-designated heritage asset, as discussed in paragraph 268 of the report.

*Noise and disturbance from refuse collection arrangements*

Final details of the refuse and recycling conditions would be secured by Condition 38 and this would include details of moving the bins from the storage to the collection area. Officers would have to assess the details prior to approval, and would consider amenity impacts as part of this. Officers would not expect the bins to be moved from the storage to the collection area during unsociable hours, and details of timings would be expected to be submitted in support of Condition 38.

*Daylight and sunlight*

The submitted daylight and sunlight assessment has been independently reviewed by BRE as noted at paragraph 411. Breton House has not been included in the assessment as, due to its significant distance away from the host property, there would not be any impact to daylight or sunlight to this property.

*Air Quality*

As confirmed from paragraph 433, the air quality officer has been consulted and confirmed the proposal to be acceptable with regard to its impact upon air quality.

**Conditions**

It has been noticed that Rain and Greywater Harvesting Condition has been duplicated at Condition 4 and Condition 17. Condition 17 is deleted. The reason for condition 4 is amended to read:

**REASON:** To assist the environmental sustainability of the development and reduce flood risk by reducing potable water demands and water run-off, and its resilience and adaptation to climate change in accordance with the following policies of the Local Plan: CS18; CS15, DM15.1, DM15.5 and Draft City Plan 2040: DE3.